



## **Confidentiality Policy**

### **Introduction**

Creating Space For You CIC's work includes the handling of confidential information. Our Confidentiality Policy reflects every individual's right to privacy and confidentiality, whilst at the same time reflecting the necessity of accessing and sharing essential information to keep people safe.

We must also balance the desire for confidentiality against the responsibility of care that we have for clients and coaches, and our need to ensure their ultimate health and wellbeing. To ensure that all those using and working with information in the organisation can do so with confidence, we respect confidentiality in line with the requirements of the General Data Protection Regulation 2018 (GDPR) and our Safeguarding Policy.

Examples of confidential information includes and is not limited to: learner registration details, disclosures during training sessions, submissions of work, information shared in coaching and supervision sessions, information shared through social media and other communication channels.

The scope of this policy includes any individuals who come into contact with Creating Space For You CIC as an employee, client, learner, coach, coachee, or contractor.

Please also see Data Protection Policy and Data Retention Policy.

### **Policy Principles**

Wherever the work of Creating Space For You CIC is being undertaken, all individuals' right to privacy and confidentiality are explained, respected and upheld, wherever this does not conflict with the health and wellbeing of clients and coaches.

### **Aims**

- To allow clients and coaches to be in an environment where their right to privacy and confidentiality are clear and respected, wherever this does not impinge on the health and wellbeing of the clients and coaches.
- To deal with information about clients and coaches in a sensitive and appropriate way, ensuring confidentiality maintained and that information is shared on a strictly



'need to know' basis, ideally with the knowledge and consent of the individuals involved if this is safe to do so.

- To maintain records in an agreed and secure way, destroy them appropriately, after an agreed time in line with the Data Retention Policy.
- To ensure that any outside agencies or others who have contact with the organisation are made aware, where appropriate, of the policy regarding confidentiality and agree to conform to it.
- To challenge and respond to situations in which any coaches, clients or visitors feel that their right to privacy and confidentiality has not been met

### **Disclosure of Information**

Creating Space For You CIC is committed to making the organisation as open, accountable and transparent as practicable, subject to statutory provisions covering the investigation of complaints and the handling of personal data.

Individual coaches with Creating Space For You CIC must not, without proper authorisation, disclose confidential information which they acquire in the course of their interactions with Creating Space For You CIC, or which has been received in confidence from others.

It is important that all individuals:

- only access information related to activity they are carrying out
- remember, that even if confidential or personal information appears trivial or widely known, it should not be disclosed to anyone outside the organisation except in the terms of this policy or with specific authorisation,
- ensure that all papers and electronic files coaches with the work of the organisation are kept securely.

Individuals must not disclose knowledge gained in the course of their activity in social settings or on social media and should avoid discussions of a confidential nature in any setting where they may be overheard.



When photocopying or working on confidential documents, individuals must ensure that these are not seen by people in passing. This also applies to information on computer screens. Individuals should ensure when they are working with confidential information, be that in hard copy or electronically, that others who are not party to the information do not inadvertently see it. Laptops, computers and other digital devices used to view Creating Space For You CIC information should all have password protected log in screens and/or screensavers so that their contents cannot be viewed without the proper authorisation if they are left unattended for any time. The duty of confidentiality continues to apply after an individual leaves the Creating Space For You CIC activity.

If any individual has any concerns about the safety of an individual or group of individuals as a result of their interactions with Creating Space For You CIC, they must inform the leader of their activity or Charlie Mitchell, Director as soon as possible, or follow the procedure outlined in the Safeguarding Policy.

### **Data Protection**

The following measures are in place to ensure that confidential information is stored and dealt with appropriately and all coaches of Creating Space For You CIC should ensure that they familiarise themselves with them and follow them carefully:

- Clients' and coaches' records are kept in password protected files on computers that are also password protected
- Access to computerised files is strictly limited to administrators and those who need to access them
- Records on quality assurance and performance management discussions are kept in restricted access areas of the computer system.
- Coach and client files are retained for seven years and then destroyed.
- Care is taken not to display information of a personal nature publicly, without gaining prior permission.
- Discussing clients, visitors or coaches' personal matters in a general and or public way is discouraged.

The Creating Space For You CIC Director, Charlie Mitchell responsible for compliance with the regulations.



Appropriate information is given to clients, coaches and visitors to explain the requirements for holding data and making disclosures to other organisations.

The organisation will make sure appropriate procedures are in place to ensure that the passing of sensitive personal data will be done in a secure manner.

Training opportunities will be made available to ensure that coaches are aware of the principles of confidentiality as they affect their working practice.

The organisation will respect personal requests for confidentiality with regard to sensitive data and aim to provide a quality service within the scope allowed.

In the event of a request for information to stay confidential with regard to sensitive personal data, any genuine concern regarding health and safety and/or duty of care to the client or coach may override the request, in line with the Safeguarding Policy.

Responsibility for Policy:  
Charlie Mitchell

Date of last review: 15/10/2024

Date of next review: 15/10/2025