



Data Protection Policy

Version: 1.0

Policy Owner: Andy Robinson, Director

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1. Purpose

Insight2Excellence Ltd recognises that personal information is entrusted to us by clients and others who interact with the business.

Protecting personal information is an important part of providing a safe, professional and trustworthy coaching service.

This Data Protection Policy explains how Insight2Excellence manages and protects personal data and how the business seeks to comply with applicable UK data-protection legislation.

The policy is intended to:

- protect the privacy and rights of individuals
- ensure personal data is handled lawfully, fairly and transparently
- provide a consistent approach to collecting, using, storing and disposing of personal data
- reduce the risk of loss, misuse, unauthorised access or disclosure
- support appropriate professional, ethical and accountable practice
- explain responsibilities for data protection within Insight2Excellence
- provide a framework for responding to data-protection requests and incidents.

This policy should be read alongside the:

- Confidentiality and Privacy Policy
- Privacy Notice
- Coaching Agreement

- Complaints Procedure
 - Safeguarding Adults Policy
 - Records Retention Schedule
 - Information Security arrangements
 - Professional Boundaries Policy
 - any other relevant Insight2Excellence policies and procedures.
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2. Scope

This policy applies to personal data processed by Insight2Excellence in connection with its business and coaching activities.

This includes personal data relating to:

- current and prospective clients
- former clients
- professional contacts
- suppliers and service providers
- professional supervisors
- other individuals whose personal data Insight2Excellence legitimately processes.

It applies to personal data held in:

- electronic systems
 - email
 - cloud storage
 - coaching and administrative records
 - financial records
 - paper documents
 - communications
 - online platforms
 - other systems or media used for legitimate business purposes.
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3. Data Protection Responsibilities

Insight2Excellence Ltd is responsible for ensuring that personal data is processed appropriately.

As a sole-practitioner business, the Director currently has primary responsibility for data protection.

The Director will:

- maintain appropriate data-protection policies and procedures
- ensure that personal data is processed in accordance with applicable law
- consider privacy and security when introducing new systems or processes
- maintain appropriate records and documentation
- respond appropriately to data-protection requests
- manage personal-data breaches and security incidents
- review data-protection arrangements regularly
- seek professional advice where necessary.

Where third parties process personal data on behalf of Insight2Excellence, appropriate responsibilities and requirements will be established in accordance with applicable law.

4. Applicable Legislation and Standards

Insight2Excellence will comply with applicable UK data-protection legislation and relevant regulatory requirements.

The principal framework includes:

- the UK General Data Protection Regulation (UK GDPR)
- the Data Protection Act 2018
- the Data (Use and Access) Act 2025, insofar as its provisions apply
- the Privacy and Electronic Communications Regulations 2003 (PECR), where applicable
- other applicable legislation and regulatory requirements relating to privacy, confidentiality and information security.

Insight2Excellence will also take account of relevant professional and ethical standards, including those applicable to coaching practice.

The policy is informed by the ethical principles of recognised professional coaching organisations, including the Association for Coaching and Universal Coaching Alliance.

The Data (Use and Access) Act 2025 has now brought its data-protection provisions into force, and the ICO continues to update its guidance accordingly. Insight2Excellence will keep this policy under review as regulatory guidance develops.

5. The Data Protection Principles

Insight2Excellence will process personal data in accordance with the data-protection principles established by applicable UK data-protection legislation.

Personal data will be:

5.1 Lawful, fair and transparent

Personal data will only be processed where there is a lawful basis for doing so.

Information about how personal data is processed will be provided in clear and accessible language.

5.2 Collected for specified purposes

Personal data will be collected for specific, explicit and legitimate purposes and will not be used in ways that are incompatible with those purposes.

5.3 Adequate, relevant and limited

Only personal data that is adequate, relevant and necessary for the relevant purpose will normally be collected or retained.

5.4 Accurate

Reasonable steps will be taken to ensure that personal data is accurate and, where necessary, kept up to date.

Where inaccurate information is identified, appropriate steps will be taken to correct or update it.

5.5 Kept only as long as necessary

Personal data will not be retained for longer than is necessary for the purpose for which it is processed, taking account of applicable legal, professional, insurance, financial and business requirements.

5.6 Secure

Personal data will be protected using appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage.

5.7 Accountable

Insight2Excellence will take responsibility for complying with the data-protection principles and will maintain appropriate records and processes to demonstrate compliance.

These principles reflect the seven core UK GDPR principles identified by the Information Commissioner's Office.

6. Lawful Processing

Insight2Excellence will only process personal data where there is an appropriate lawful basis under applicable data-protection legislation.

Depending on the circumstances, this may include:

- performance of a contract
- compliance with a legal obligation
- legitimate interests
- consent
- protection of vital interests
- another lawful basis permitted by applicable legislation.

The lawful basis for particular processing activities will be identified and documented where required.

The Privacy Notice explains the principal purposes for which client personal data is processed and the relevant lawful bases.

Consent will not be used where it is inappropriate or where another lawful basis provides the proper legal foundation for the processing.

Where processing is based on consent, consent will be:

- freely given
- specific
- informed
- unambiguous
- capable of being withdrawn.

Withdrawing consent will not affect the lawfulness of processing that took place before consent was withdrawn.

7. Special Category Data

Coaching may involve information that falls within the special categories of personal data under UK data-protection law.

This may include information relating to:

- health
- disability
- racial or ethnic origin
- religious or philosophical beliefs
- sexual orientation
- other categories protected by applicable legislation.

Insight2Excellence recognises that special-category data requires additional legal protection.

Where special-category data is processed, Insight2Excellence will identify and document an appropriate condition for processing in addition to the ordinary lawful basis where required.

Only information that is appropriate and necessary for the relevant purpose will normally be collected.

Clients will not be required to disclose sensitive information simply because it may be relevant to coaching.

Further information about the processing of special-category data is provided in the Privacy Notice and relevant data-protection records.

8. Data Minimisation

Insight2Excellence will seek to collect only information that is adequate, relevant and necessary for the purpose for which it is being processed.

The fact that information may be interesting, useful or potentially relevant does not by itself mean that it should be collected.

Particular care will be taken with coaching notes and information relating to personal circumstances.

Where information is no longer necessary, it will be deleted, securely destroyed or otherwise dealt with in accordance with the applicable retention arrangements.

9. Coaching Notes and Professional Records

Coaching notes will be created and maintained only where there is a legitimate professional or business reason to do so.

Notes will be:

- relevant to the coaching relationship
- factual and proportionate where possible
- handled confidentially
- stored securely
- accessible only to authorised persons
- retained in accordance with the Records Retention Schedule.

Insight2Excellence will avoid unnecessary recording of highly sensitive personal information.

Professional reflections relating to a client will be treated as confidential information and protected accordingly.

The requirements of this section operate alongside the Confidentiality and Privacy Policy.

10. Data Used for Professional Supervision

As described in the Confidentiality and Privacy Policy, professional supervision is an important part of safe and ethical coaching practice.

Where client-related information is discussed in supervision:

- information will be minimised wherever reasonably practicable
- identifying information will normally be removed or appropriately de-identified
- only information reasonably necessary for effective supervision will be shared
- appropriate confidentiality arrangements will apply.

Clients will be informed that aspects of their coaching may be discussed in professional supervision.

The Association for Coaching specifically recognises that client work may be referred to anonymously in supervision and requires appropriate confidentiality, security and privacy in the handling of client records.

11. Data Accuracy

Insight2Excellence will take reasonable steps to ensure that personal information is accurate and, where necessary, kept up to date.

Clients are encouraged to inform Insight2Excellence if relevant information changes or if they believe information held about them is inaccurate.

Where appropriate, inaccurate information will be corrected without undue delay.

12. Data Security

Insight2Excellence will use appropriate technical and organisational measures to protect personal data.

Depending on the circumstances, these may include:

- strong passwords
- multi-factor authentication where available and appropriate
- encryption
- secure cloud storage
- access controls
- device security
- software and system updates
- secure physical storage

- appropriate backups
- secure disposal
- protection against phishing and other cyber threats
- limiting access to those with a legitimate need to know.

Security measures will be proportionate to the nature and sensitivity of the information and the risks involved.

Hiscox identifies accidental disclosure, theft and cyberattack as significant confidentiality risks and recommends measures including secure passwords, encryption, restricted access and early action when incidents occur.

13. Access to Personal Data

Access to personal data will be restricted to the Director and other authorised persons who have a legitimate need to access the information.

Where a third-party service provider processes personal data on behalf of Insight2Excellence, access will be limited to what is necessary for the relevant service.

Access will not be granted simply because someone works with or provides services to Insight2Excellence.

Where appropriate, contractual, technical or organisational measures will be used to protect personal data accessed by third parties.

14. Third-Party Service Providers and Data Processors

Insight2Excellence may use third-party providers to support the delivery and administration of its services.

These may include providers of:

- email services
- online meeting platforms
- scheduling systems
- payment processing
- accounting services
- secure cloud storage
- website hosting
- IT support
- other essential business services.

Where a third party processes personal data on behalf of Insight2Excellence, appropriate due diligence and contractual arrangements will be considered and implemented where required.

Insight2Excellence will take reasonable steps to ensure that third-party providers provide appropriate safeguards for personal data.

The Privacy Notice will provide appropriate information about relevant categories of third-party recipients.

15. International Transfers

Some third-party technology or service providers may process or store information outside the United Kingdom.

Where personal data is transferred outside the UK, Insight2Excellence will comply with the applicable requirements governing international transfers.

This may include considering:

- whether the destination has an appropriate adequacy decision
- whether appropriate safeguards are in place
- whether additional measures are required
- whether the transfer is permitted under applicable law.

International transfer arrangements will be reviewed where relevant when selecting or changing service providers.

16. Direct Marketing and Communications

Insight2Excellence will only use personal data for direct marketing in accordance with applicable data-protection and electronic-communications law.

Marketing communications will be handled transparently and appropriately.

Where consent is required, it will be obtained in an appropriate manner and individuals will be able to withdraw it.

Clients' confidential coaching information will not be used for marketing purposes.

Testimonials, photographs, case studies or other promotional material involving identifiable clients will only be used where there is an appropriate lawful basis and any required consent or agreement has been obtained.

MOE Foundation's published privacy and course terms similarly distinguish voluntary feedback/testimonials from ordinary service delivery and provide for consent and withdrawal in relation to promotional use.

17. Data Subject Rights

Insight2Excellence respects the rights individuals have under applicable data-protection legislation.

Depending on the circumstances, these may include the right to:

- receive privacy information
- request access to personal data
- request correction of inaccurate data
- request deletion of data where applicable
- request restriction of processing where applicable
- object to certain processing
- request data portability where applicable
- withdraw consent where processing is based on consent
- object to direct marketing
- exercise rights relating to automated decision-making and profiling where applicable.

Not every right applies in every circumstance.

Requests will be handled in accordance with applicable law and the Insight2Excellence Data Protection Procedure.

18. Subject Access Requests

An individual may request access to personal information held about them.

Requests will be handled in accordance with applicable legal requirements.

Insight2Excellence will:

- verify the identity of the requester where reasonably necessary
- identify the information falling within the request
- consider whether any lawful exemptions apply
- provide the information in an appropriate form
- respond within the applicable statutory timescale.

Individuals will not normally be charged for making a valid access request, although applicable law may permit a reasonable fee in limited circumstances.

19. Requests for Correction, Deletion or Restriction

Individuals may ask Insight2Excellence to:

- correct inaccurate personal data

- delete personal data where applicable
- restrict processing where applicable
- object to certain processing.

Requests will be considered against the requirements and exemptions contained in applicable data-protection legislation.

Insight2Excellence will not promise deletion where there is a lawful reason to retain information, such as a legal, regulatory, safeguarding, professional, insurance or accounting requirement.

20. Data Retention

Insight2Excellence will not keep personal data indefinitely.

Different categories of information may have different retention periods because of:

- legal requirements
- professional responsibilities
- insurance requirements
- accounting and financial requirements
- safeguarding considerations
- complaints and potential claims
- legitimate business requirements.

Specific retention periods will be set out in the Insight2Excellence Records Retention Schedule.

When information is no longer required, it will be securely deleted, destroyed or otherwise disposed of.

The Association for Coaching recognises the need for appropriate retention of client records, while UK data-protection law requires retention to be justified by the purposes for which information is held.

21. Data Protection by Design and Default

Privacy and data protection will be considered when introducing or changing systems, processes or services that involve personal data.

Where appropriate, Insight2Excellence will consider:

- what personal data is genuinely required
- whether a less intrusive approach is possible
- who needs access

- how information will be secured
- how long it will need to be retained
- whether third-party processing is involved
- whether an international transfer is involved
- whether additional privacy safeguards are required.

Where processing is likely to result in a high risk to individuals' rights and freedoms, a Data Protection Impact Assessment will be considered and undertaken where required.

22. Data Breaches and Security Incidents

A personal-data breach may include:

- loss or theft of personal data
- accidental disclosure
- sending information to the wrong person
- unauthorised access
- hacking or cyberattack
- loss of a device containing personal information
- accidental deletion or destruction of information
- other incidents compromising the confidentiality, integrity or availability of personal data.

Any suspected or actual breach should be reported to the Director as soon as reasonably possible.

Insight2Excellence will:

1. take immediate steps to contain the incident where possible
2. assess what information is involved
3. assess the potential risk to affected individuals
4. document the incident
5. take steps to reduce potential harm
6. determine whether notification to the ICO is legally required
7. determine whether affected individuals should be informed
8. notify insurers or professional advisers where appropriate
9. review the circumstances and take steps to reduce the risk of recurrence.

Where a personal-data breach is reportable to the ICO, it will be reported without undue delay and, where feasible, within the applicable statutory timescale.

23. Confidentiality and Data Protection

Data protection and professional confidentiality are related but distinct responsibilities.

Data-protection law regulates the processing of personal data.

Professional confidentiality concerns the ethical and professional obligation to protect information entrusted to the coach.

Insight2Excellence will respect both.

The Confidentiality and Privacy Policy explains the professional boundaries and limits of confidentiality within the coaching relationship.

This Data Protection Policy outlines the governance arrangements for the processing of personal data.

Where the two areas overlap, Insight2Excellence will seek to apply the stronger appropriate protection while complying with applicable law.

24. Online Coaching and Electronic Communication

Insight2Excellence recognises that online coaching and electronic communication create additional privacy and security considerations.

Reasonable measures will be taken to protect:

- online coaching sessions
- emails
- electronic documents
- messaging
- appointment information
- digital coaching records

Clients will be encouraged to:

- use private devices and accounts where possible
- protect their devices and accounts
- participate in online coaching from a private location
- consider who may be able to hear or see a coaching session
- avoid sending highly sensitive information through unnecessarily insecure channels.

Further requirements are set out in the Confidentiality and Privacy Policy.

25. Recordings

Coaching sessions will not normally be recorded by Insight2Excellence.

Where a recording is proposed:

- the purpose will be explained in advance
- the recording will be discussed with the client
- any required consent or other lawful basis will be addressed
- access will be restricted
- the recording will be stored securely
- the retention period will be established
- the recording will be securely deleted when it is no longer required.

Recordings will be treated as personal and confidential information.

26. Artificial Intelligence and Data Technologies

Insight2Excellence recognises that artificial intelligence and other data technologies raise particular data protection, confidentiality, and ethical considerations.

Personal data will not knowingly be entered into publicly available or third-party AI systems unless Insight2Excellence has first considered:

- the purpose of the processing
- the applicable lawful basis
- whether the information is necessary
- the security and privacy arrangements of the system
- whether confidential information is being disclosed
- whether special-category data is involved
- whether the client needs to be informed
- whether any additional safeguards are required.

Identifiable client information will not be used with an AI system merely for convenience.

Where technology is used in connection with coaching, Insight2Excellence will remain responsible for ensuring that its use is consistent with applicable legal, professional and ethical requirements.

The current UCA Code specifically recognises the ethical responsibilities associated with data technologies and AI, while the Association for Coaching likewise requires technology to be used in alignment with professional and legal standards.

27. Data Protection and Professional Supervision

Professional supervision may involve discussion of situations arising within coaching practice.

Insight2Excellence will take reasonable steps to ensure that personal data is appropriately minimised or de-identified before being discussed.

Where identifiable information is genuinely necessary for ethical or professional reasons, the information shared will be limited to what is required.

Supervision arrangements will be consistent with the Confidentiality and Privacy Policy and with applicable data protection requirements.

28. Complaints Concerning Personal Data

Clients who have concerns about how their personal data has been handled are encouraged to raise them with Insight2Excellence.

Complaints will be managed in accordance with the Insight2Excellence Complaints Procedure.

Where appropriate, a data-protection complaint will also be managed in accordance with this Data Protection Policy and the relevant data-protection procedures.

Individuals also have the right to complain to the Information Commissioner's Office if they believe their personal data has not been handled in accordance with applicable data protection law.

29. Data Protection and Safeguarding

Data protection does not prevent appropriate action being taken to protect people from serious harm.

Where safeguarding concerns arise, personal information may need to be shared with appropriate persons or authorities.

Any such disclosure will be handled in accordance with:

- applicable law
- safeguarding responsibilities
- the Insight2Excellence Safeguarding Adults Policy
- the Confidentiality and Privacy Policy.

Only information that is reasonably necessary for the safeguarding purpose will normally be shared.

30. Data Protection and Insurance

Insight2Excellence recognises that appropriate information-security and data-protection arrangements form part of responsible professional and business risk management.

Relevant insurance requirements will be considered when reviewing data protection and information security arrangements.

Hiscox identifies confidentiality breaches and cyber incidents as risks that can result in legal, financial, and reputational consequences, and recommends appropriate security controls and early action following such incidents.

This policy does not replace or alter the terms of any insurance policy held by Insight2Excellence. The actual policy wording and requirements of the relevant insurer will take precedence where applicable.

31. Training, Awareness and Professional Development

The Director will maintain an appropriate level of knowledge and awareness of data-protection responsibilities.

This may include:

- keeping up to date with ICO guidance
- reviewing changes in legislation
- undertaking relevant professional development
- considering data-protection issues in professional supervision
- reviewing security practices
- learning from incidents or complaints.

Where Insight2Excellence engages other people who have access to personal data, appropriate information, guidance or training will be provided according to their role.

32. Data Protection Records and Accountability

Insight2Excellence will maintain appropriate records to support accountability and demonstrate compliance.

Depending on the nature and scale of processing, these may include:

- records of processing activities where required
- privacy information
- lawful-basis assessments
- records of consent where applicable
- data-processing agreements
- data-breach records

- data-protection requests
- retention arrangements
- relevant risk assessments
- records of data-protection decisions.

Documentation will be proportionate to the size and nature of the business.

33. Data Protection by Third Parties

Where Insight2Excellence shares personal data with another organisation, consideration will be given to:

- why the information is being shared
- whether the sharing is lawful
- what information is necessary
- who will receive it
- how it will be protected
- whether the recipient is acting as a data processor or independently determining its processing
- whether contractual arrangements are required
- whether an international transfer is involved.

Personal data will not be shared simply because doing so is convenient.

34. Children and Young People

Insight2Excellence primarily provides coaching to adults unless otherwise agreed.

Where services involve individuals under 18, additional consideration will be given to:

- safeguarding
- consent and parental/guardian involvement where appropriate
- confidentiality boundaries
- the child's or young person's understanding
- applicable legal requirements
- professional competence and insurance requirements.

Any coaching involving children or young people will be subject to appropriate safeguarding arrangements.

35. Data Protection Incidents, Complaints and Learning

Insight2Excellence will use incidents, complaints, near misses, and professional reflection as opportunities to improve data protection practice.

Where appropriate, this may result in:

- changes to procedures
- improved security
- additional training
- changes to technology
- revised retention arrangements
- changes to third-party providers
- updates to privacy information
- additional professional supervision

The aim is continual improvement rather than simply responding to problems after they occur.

36. Policy Review

This policy will be reviewed at least annually and sooner where necessary.

An earlier review may be undertaken where:

- legislation changes
- ICO guidance changes
- professional coaching guidance changes
- new technology or AI is introduced
- a significant data breach occurs
- a significant change is made to business operations
- insurance requirements change
- complaints or professional learning indicate that changes are needed.

The policy will be updated where necessary to remain appropriate, proportionate and legally compliant.

Appendix A – Data Protection Principles in Practice

Insight2Excellence will ask the following questions when handling personal information:

1. Do I need this information?

If not, I will avoid collecting it.

2. Why do I need it?

There should be a clear and legitimate purpose.

3. Am I allowed to use it?

There must be an appropriate lawful basis.

4. Is the person aware of what I am doing?

Privacy information should be clear and accessible.

5. Who needs to see it?

Access should be limited to what is necessary.

6. Is it accurate?

Inaccurate information should be corrected where appropriate.

7. How long do I need it?

Information should not be retained unnecessarily.

8. How am I protecting it?

Appropriate technical and organisational safeguards should be used.

9. Am I sharing it appropriately?

Information should only be shared where there is a legitimate and lawful reason.

10. Would I be comfortable explaining my decision?

Insight2Excellence will seek to maintain a culture of accountability and transparency around personal data.

Appendix B – Related Documents

This policy should be read alongside:

- Confidentiality and Privacy Policy
- Privacy Notice
- Coaching Agreement
- Complaints Procedure
- Safeguarding Adults Policy
- Records Retention Schedule
- Information Security arrangements
- Professional Boundaries Policy
- any other relevant Insight2Excellence policies and procedures.