



Confidentiality and Privacy Policy

Version: 1.1

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Approved: September 2026

Review Date: September 2027

1. Purpose

Confidentiality is fundamental to the coaching relationship.

Insight2Excellence Ltd is committed to creating an environment in which clients can speak openly, honestly and safely, knowing that information shared within coaching will be treated with respect, sensitivity and care.

This policy explains:

- what confidentiality means within the coaching relationship
- how Insight2Excellence protects clients' privacy
- the circumstances in which confidential information may need to be disclosed
- how information may be used, stored and protected
- how confidentiality operates in professional supervision
- how confidentiality applies to online coaching, electronic communication and technology
- clients' rights and where they can obtain further information.

This policy should be read alongside the:

- Coaching Agreement
- Data Protection Policy
- Privacy Notice
- Safeguarding Adults Policy

- Complaints Procedure
- any other relevant Insight2Excellence policies and procedures.

This policy describes the professional and ethical approach Insight2Excellence takes to confidentiality and privacy. Detailed information about how personal data is processed under UK data-protection legislation is provided in the Insight2Excellence Privacy Notice and Data Protection Policy.

2. Our Commitment

Insight2Excellence believes that trust is built through honesty, transparency, respect and clear professional boundaries.

Information shared during coaching will normally be treated as confidential and will not be shared with another person without the client's knowledge or permission, except where there is a lawful or professionally necessary reason to do so.

Insight2Excellence will:

- respect the confidentiality and privacy of clients
 - explain the limits of confidentiality before coaching begins
 - handle client information sensitively and responsibly
 - collect and retain only information that is appropriate and necessary for legitimate purposes
 - take appropriate measures to protect information against unauthorised access, loss, misuse or disclosure
 - maintain appropriate professional records
 - ensure that confidentiality continues to be respected after the coaching relationship ends
 - comply with applicable professional standards and UK law.
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3. What Confidentiality Means

Confidentiality means that information shared by a client within the coaching relationship will not normally be disclosed to other people without the client's knowledge or permission.

This may include:

- conversations during coaching sessions
- coaching notes
- goals and objectives

- action plans
- personal reflections
- personal circumstances discussed during coaching
- correspondence
- information provided in connection with appointments
- other information that could reasonably be understood to be confidential.

Confidentiality applies whether information is communicated verbally, in writing, electronically or through another form of communication.

Confidentiality is an important part of creating a safe and trusting coaching relationship. It does not, however, mean that confidentiality is absolute.

4. Limits of Confidentiality

Clients will be informed before coaching begins about the circumstances in which confidentiality may not be maintained.

Insight2Excellence may disclose confidential information where:

- the client gives informed consent for the information to be shared
- disclosure is required by law or by a lawful authority
- disclosure is necessary to comply with a legal or regulatory obligation
- there is a safeguarding concern involving a child or adult at risk
- there is a significant and credible risk of serious harm to the client or another person
- disclosure is otherwise permitted or required by law.

The existence of a safeguarding concern or risk of serious harm does not automatically mean that all information held about a client will be disclosed. Any disclosure will be limited, where reasonably practicable, to information that is relevant and necessary for the purpose for which it is being shared.

Where appropriate and safe to do so, Insight2Excellence will discuss a proposed disclosure with the client beforehand.

This may not be possible where doing so could increase risk, prejudice a safeguarding response, obstruct an investigation, or where disclosure is required by law without prior notification.

Insight2Excellence does not assume that information about a past offence must automatically be disclosed simply because a crime has been mentioned. Any disclosure will be considered in light of the circumstances, applicable law, professional responsibilities and safeguarding considerations.

5. Safeguarding and Confidentiality

Safeguarding responsibilities may require confidentiality to be limited.

Where there is a concern that a child or adult may be experiencing abuse, neglect, exploitation or another safeguarding risk, the matter will be managed in accordance with the Insight2Excellence Safeguarding Adults Policy and applicable safeguarding requirements.

Where there is an immediate risk of serious harm, appropriate emergency or safeguarding services may need to be contacted.

Information will be shared only to the extent reasonably necessary to address the safeguarding concern, taking account of applicable law and professional guidance.

Clients are encouraged to ask questions about how safeguarding and confidentiality interact at any stage of the coaching relationship.

6. Professional Supervision

Professional coaching supervision is an important part of safe, ethical and effective coaching practice.

From time to time, aspects of coaching work may be discussed within professional supervision for purposes including:

- maintaining safe and ethical practice
- reflecting on coaching practice
- considering ethical dilemmas
- supporting professional development
- ensuring that the coach remains within appropriate professional boundaries and competence.

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

Where a client's situation is discussed:

- identifying information will normally be removed or minimised wherever reasonably practicable
- discussions will focus on professional practice rather than unnecessary personal details
- information will be shared only to the extent reasonably necessary for effective supervision
- the confidentiality of the supervision relationship will be respected.

Insight2Excellence will take reasonable steps to ensure that professional supervision is undertaken with an appropriately qualified or experienced professional who observes suitable confidentiality and ethical standards.

7. Information We May Hold

Depending on the nature of the coaching service, Insight2Excellence may hold information including:

- name
- contact details
- emergency contact information where provided
- coaching goals and objectives
- information relevant to the coaching relationship
- coaching notes
- appointment records
- correspondence
- invoices and payment records
- information relating to complaints or concerns
- information required for safeguarding
- other information necessary for the provision and administration of coaching services.

Insight2Excellence aims to collect only information that is adequate, relevant and necessary for the purposes for which it is being processed.

Clients are not expected to disclose information simply because it is potentially relevant to coaching. Clients remain in control of what they choose to share, subject to the limits of confidentiality described in this policy.

8. Sensitive and Special-Category Information

Coaching may involve clients choosing to discuss sensitive personal circumstances.

This may include information concerning:

- physical or mental health
- disability
- neurodivergence
- sexual orientation
- religious or philosophical beliefs
- racial or ethnic origin
- other information that may receive additional protection under data-protection law.

Insight2Excellence recognises that such information requires particular care.

Clients are encouraged to share only information that they consider relevant to their coaching needs.

Where special-category personal data is processed, Insight2Excellence will comply with the additional requirements applicable under UK data-protection legislation. Further information about this is provided in the Insight2Excellence Data Protection Policy and Privacy Notice.

9. How Information Is Used

Information relating to clients may be used for legitimate purposes connected with the provision and administration of coaching, including:

- providing coaching services
- communicating with clients
- arranging and managing appointments
- maintaining appropriate professional records
- managing payments and financial records
- responding to concerns and complaints
- meeting safeguarding responsibilities
- complying with legal or regulatory obligations
- maintaining appropriate professional, insurance and business records
- improving professional practice where information can be used appropriately and lawfully.

Personal information will not be sold to third parties.

Insight2Excellence will not use confidential client information for marketing or promotional purposes without an appropriate lawful basis and, where required, the client's consent.

The lawful bases relied upon for different types of personal-data processing are explained in the Insight2Excellence Data Protection Policy and Privacy Notice.

10. Storage and Security

Insight2Excellence will take appropriate technical and organisational measures to protect personal and confidential information.

Depending on the nature of the information and the circumstances, this may include:

- secure password protection

- appropriate encryption
- access controls
- secure cloud or electronic storage
- secure physical storage
- keeping devices and software appropriately protected
- limiting access to authorised persons
- secure disposal of information when it is no longer required.

Access to client information will be limited to the Director or other authorised persons who have a legitimate need to access the information for professional, administrative, legal, regulatory or business purposes.

Insight2Excellence will take a proportionate, risk-based approach to information security, recognising that particularly sensitive information may require additional protection.

11. Privacy and Third-Party Services

Insight2Excellence may use trusted third-party service providers to support the delivery and administration of coaching, such as providers of:

- online meeting services
- email
- scheduling
- accounting or payment services
- secure storage
- website or technical services
- other essential business systems.

Where third parties process personal data on behalf of Insight2Excellence, appropriate checks and contractual arrangements will be used where required by law.

Clients will be provided with further information about relevant categories of third parties and data processing in the Insight2Excellence Privacy Notice and Data Protection Policy.

Where personal data is transferred outside the United Kingdom, Insight2Excellence will comply with the requirements applicable to international transfers under UK data-protection legislation.

12. Electronic Communication

Insight2Excellence recognises that electronic communication carries some security risks.

Reasonable steps will be taken to protect electronic communications, but no method of electronic communication can be guaranteed to be completely secure.

Clients are encouraged to:

- use a private email address where possible
- protect their email account and devices with appropriate passwords or security measures
- consider confidentiality when using shared devices
- avoid sending highly sensitive information by ordinary email where a more appropriate secure method is available
- choose a private environment for online coaching sessions.

Insight2Excellence will not deliberately require clients to use an unnecessarily insecure method of communicating sensitive personal information where a reasonably practicable alternative is available.

13. Online Coaching

Where coaching takes place online:

- appropriate secure meeting platforms will be used wherever reasonably possible
- clients will be encouraged to participate from a private location
- clients will be encouraged to consider who may be able to hear or see the session
- Insight2Excellence will take reasonable steps to protect the privacy of online sessions
- coaching sessions will not normally be recorded by Insight2Excellence
- any proposed recording will be discussed and agreed in advance by both parties.

Where a recording is agreed, the purpose, storage arrangements, access arrangements and intended deletion arrangements will be explained in advance.

Recordings will be treated as confidential personal information and protected accordingly.

14. Artificial Intelligence and Other Technologies

Insight2Excellence recognises that digital technologies and artificial intelligence may form part of modern professional practice and that their use creates particular confidentiality, privacy and ethical considerations.

Insight2Excellence will not knowingly enter identifiable client information into publicly available or third-party artificial intelligence tools unless there is an appropriate lawful basis, suitable data-protection and confidentiality safeguards, and any required client information or consent has been addressed.

Where technology or artificial intelligence is used in connection with coaching or the administration of coaching:

- confidentiality will be considered before information is entered or shared
- personal information will be minimised wherever reasonably practicable
- appropriate security and privacy safeguards will be considered
- applicable data-protection law and professional ethical standards will be followed
- clients will be informed where the use of technology materially affects how their personal information is processed.

Insight2Excellence will remain professionally accountable for the way technology is used and will not treat the use of an automated or AI system as removing professional responsibility.

15. Confidentiality After Coaching Ends

Confidentiality does not automatically end when the coaching relationship ends.

Insight2Excellence will continue to treat former clients' confidential information with appropriate care and will not use or disclose such information inappropriately.

Any ongoing retention of personal information will be managed in accordance with applicable data-protection requirements and the Insight2Excellence Data Protection Policy and retention arrangements.

16. Record Retention

Insight2Excellence will retain records only for as long as there is a legitimate and justifiable reason to do so.

Different types of records may need to be retained for different periods because of:

- legal requirements
- professional responsibilities
- insurance considerations
- financial and accounting requirements
- safeguarding responsibilities
- the need to respond to complaints or potential claims
- legitimate business needs.

The specific retention periods and arrangements are set out in the Insight2Excellence Data Protection Policy and Records Retention Schedule.

Personal information will be securely deleted or otherwise disposed of when it is no longer required, subject to any lawful requirement to retain it.

17. Clients' Privacy and Data Protection Rights

Clients have the data-protection rights that apply to them under UK data-protection legislation.

Depending on the circumstances, these may include rights to:

- access personal information held about them
- have inaccurate information corrected
- request deletion of personal information 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.

Not every right applies in every circumstance.

Requests concerning personal data will be handled in accordance with the Insight2Excellence Data Protection Policy and applicable law.

The Insight2Excellence Privacy Notice provides further information about how personal data is processed and how clients can exercise their rights.

18. Complaints About Confidentiality or Privacy

Clients who have concerns about confidentiality, privacy or the handling of their information are encouraged to raise them with Insight2Excellence as soon as reasonably possible.

Concerns and complaints will be managed in accordance with the Insight2Excellence Complaints Procedure.

Where a complaint concerns the processing of personal data, it will also be managed in accordance with the Insight2Excellence Data Protection Policy.

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

Nothing in this policy limits any legal, regulatory or statutory rights available to clients.

19. Confidentiality Breaches and Data Security Incidents

Insight2Excellence will take appropriate action if it becomes aware of an actual or suspected breach involving confidential or personal information.

Depending on the circumstances, this may include:

- containing the incident
- investigating what happened
- assessing the potential impact
- taking steps to reduce or prevent further harm
- documenting the incident
- notifying affected individuals where appropriate
- notifying the Information Commissioner's Office where legally required
- notifying insurers or other relevant professional advisers where appropriate
- reviewing and improving procedures to reduce the likelihood of recurrence.

Any personal data breach will be managed in accordance with the Insight2Excellence Data Protection Policy and applicable legal requirements.

20. Professional and Ethical Standards

Insight2Excellence is committed to maintaining confidentiality and privacy in accordance with:

- applicable UK legislation
- relevant data-protection requirements
- recognised professional coaching standards
- the ethical requirements of relevant professional bodies of which the coach is a member
- appropriate insurance and professional risk management requirements.

The policy is informed by recognised coaching ethics and professional practice, including the Association for Coaching Global Code of Ethics and the Universal Coaching Alliance Code of Professional Conduct and Ethics.

Where relevant, professional supervision will be used to support ethical decision-making and safe professional practice.

21. Questions About Confidentiality

Clients are encouraged to ask questions about confidentiality and privacy at any stage of the coaching relationship.

Insight2Excellence recognises that clients may reasonably want to understand:

- what information is recorded
- who may see it

- when information might need to be shared
- how supervision works
- how online coaching is protected
- how personal data is stored
- how long information is retained
- what rights they have

Questions will be answered as openly and clearly as possible.

If a client is uncertain whether something they wish to discuss can remain confidential, they are encouraged to ask before sharing it.

22. Review

This policy will be reviewed annually, or sooner if:

- legislation changes
 - data-protection requirements change
 - professional coaching guidance changes
 - insurance requirements change
 - relevant technology or AI practices change
 - learning from complaints, incidents or professional supervision indicates that changes are required
 - there is a significant change to the structure or operation of Insight2Excellence.
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Related Insight2Excellence Documents

This policy should be read alongside:

- Coaching Agreement
- Privacy Notice
- Data Protection Policy
- Safeguarding Adults Policy
- Complaints Procedure
- Records Retention Schedule
- Professional Boundaries Policy
- any other relevant Insight2Excellence policies and procedures.