# Mind Bearer Ltd.

# Confidentiality Policy

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**Scope:** Mind Bearer Ltd.

**Issued by:** Practice Manager

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## Table of Contents

# 1. Document Control

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# 2. Glossary

| Term | Description |
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# 3. Introduction

This Confidentiality Policy establishes guidelines for protecting sensitive, confidential, and proprietary information belonging to Mind Bearer Ltd ("the Company"). The objective is to ensure that all employees, contractors, and third parties understand their responsibilities in safeguarding information and preventing unauthorized disclosure.

# 4. Scope

This policy applies to:

- All employees (permanent, temporary, and part-time)
- Contractors, consultants, and third-party partners
- Any individual or entity granted access to Company information

# 5. Definition of Confidential Information

Confidential Information includes, but is not limited to:

- Business plans, strategies, and financial data
- Client and customer information
- Intellectual property, trade secrets, and proprietary processes
- Employee records and personal data
- Technical data, software, and systems
- Any information marked or reasonably understood to be confidential

# 6. Ethical Framework

All counsellors and staff must adhere to relevant professional ethical standards (e.g., BACP Ethical Framework or equivalent), which prioritise:

- Client confidentiality and privacy
- Respect for client autonomy
- Safe and ethical handling of sensitive disclosures

# 7. Responsibilities

All individuals covered by this policy must:

- Maintain strict confidentiality of client information
- Use client information solely for therapeutic or legitimate business purposes
- Store and handle information securely

- Report any breaches or concerns immediately

Counsellors are additionally responsible for:

- Clearly explaining confidentiality and its limits to clients at the outset
- Maintaining accurate and secure records

Managers are responsible for:

- Ensuring staff understand and follow this policy
- Restricting access to confidential information on a need-to-know basis

# 8. Handling of Confidential Information

## 8.1 Access Control

Access to client records is limited to authorised personnel only

Systems must be password-protected with appropriate safeguards

## 8.2 Storage and Record Keeping

Client records must be stored securely (locked cabinets or encrypted digital systems)

Notes should be factual, respectful, and relevant

## 8.3 Transmission

Confidential information must only be shared via secure methods

Email or digital communication must comply with data protection standards

## 8.4 Anonymisation

Client identity must be protected when discussing cases for supervision or training

## 8.5 Retention and Disposal

Records must be retained in accordance with legal and professional guidelines

Secure destruction methods must be used when disposing of records

# 9. Limits of Confidentiality

Confidentiality may be breached only under specific circumstances, including:

- Risk of serious harm to the client or others
- Safeguarding concerns involving children or vulnerable adults
- Legal obligations (e.g., court orders)

Where possible, clients will be informed before disclosure is made.

## 10. Data Protection and Privacy

The Company complies with the UK GDPR and Data Protection Act 2018. In particular:

- Client data is classified as special category data and requires enhanced protection
- Data must be processed lawfully, fairly, and transparently
- Clients have rights regarding access, correction, and deletion of their data

## 11. Breach of Confidentiality

Any breach of confidentiality may result in:

- Disciplinary action
- Professional reporting where required
- Legal consequences

All breaches must be reported immediately to management or the designated Data Protection Officer.

## 12. Training and Supervision

Staff will receive training on confidentiality, safeguarding, and data protection

Counsellors will engage in regular supervision, maintaining client anonymity where appropriate

## 13. Policy Review

This policy will be reviewed annually or when significant changes occur in legal, regulatory, or business requirements.

## 14. Acknowledgment

All employees and relevant parties must acknowledge that they have read, understood, and agree to comply with this Confidentiality Policy.