

Our Code of Conduct: Confidentiality

PraxisGRC has a Code of Conduct that is a living document. It lays out the elements of the approach to our coach's relationship with clients: the "relationship is built on trust, confidence and mutual confidentiality to create a safe space where individuals and groups can explore the skills and behaviours that support best practice in conducting governance, risk and compliance activities". The Code consists of 9 criteria; criteria 4 states that **We will maintain confidentiality**.

This is not just a matter of maintaining our well-established policies and procedures that support confidentiality. This is an important factor found in our contractual arrangements, in our compliance with Data Protection legislation and regulation, and in the descriptions and agreements we have created (including our Privacy Policy and Non-Disclosure Agreement), which helps us to maintain the confidence of clients that we work with.

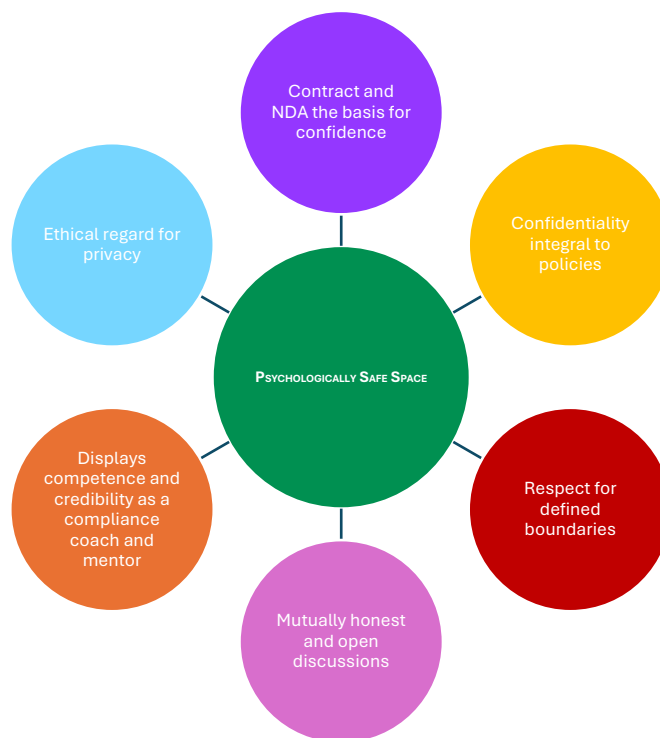
More importantly, the ethical direction of PraxisGRC means confidentiality is a core factor in what we do and how we approach client and individual relationships. This approach supports the ecosystem for the people we work with to feel confident in revealing the issues and challenges faced within their roles. Confidentiality between the coach/mentor and the individuals they support is essential to build:

- a safe space where the coach and coachee can explore, with the certainty that no private or personal information will be disclosed to third parties, unless:
 - there is a clear risk to the life and wellbeing of the coachee (in terms of the coach's Duty of Care)
 - there is a legal requirement to disclose information (such as reporting criminal activity or if disclosure is required by law enforcement)
- facilitate a transformational relationship uninhibited by the limits to conditions that enable coaching to take place, which creates a place of psychological safety where risks, opportunities and issues can be freely discussed
- encourage mutual understanding and respect, acknowledging the ethical basis for mutual discovery, self-disclosure and learning that supports and enhances the coachees experience and helps them with their journey
- acknowledge that there will be difficult discussions that challenge expectations and self-perceptions, but that intentions must be based on an openness to transformation and willingness to change.

Commitment to coaching can be a life-changing, life-enhancing, first step out of career doldrums. Confidentiality between coach and client extends to external parties as well as internally with colleagues in PraxisGRC. We do not share personal and confidential data within PraxisGRC. Wherever it is possible, internal clinics, meetings or mentoring activities between colleagues avoids potential risks to the privacy of clients by being respectful of their rights to confidentiality and privacy. We ask coaches not to engage in discussions about individual clients. We will discuss issues or challenges faced in coaching and mentoring and may refer to clients generally without mentioning specific details, except in the broadest possible terms (for example, where PraxisGRC templates have been supplied to individuals or groups to support them in areas for focus or to achieve a goal.

Confidentiality is supported by PraxisGRC's Privacy Policy and its Data Protection Policy, contractual arrangements, and through the application of a Non-Disclosure Agreement. This provides a context for coaching and mentoring activities that foster trust, building a psychological space where individuals are free to be open and vulnerable, offering encouragement for shared disclosures between coach and

coachee in a professional context. Our coaches are, or have been, GRC practitioners with a wealth of experience in a variety of different industries and sectors, which helps to enrich and liven discussions, helping to build confidence and trust.



As the coaching and mentoring organisation for GRC practitioners, we need to be aware of potential issues that could affect our service delivery both in terms of the variety of coaching organisations and more broadly in roles related to coaching and mentoring. As such, we keep up to date with incident reports about therapists, coaches and other practitioners, who may work with knowledge of individuals' private lives.

These incidents include issues of negligence resulting in a breach of confidentiality, such as the case of an occupational therapist who left a notepad containing confidential information at the address of a service user in 2019. While such reports may not directly reflect on GRC coaches' activities, it is important to recognise that the basics of confidentiality (i.e. the collection, use and retention of notes) as well as the challenge from cybersecurity, must be addressed appropriately to allow all our clients to feel comfortable, confident, safe and secure in their dealings with PraxisGRC's practitioners.