

# Confidentiality and Data Protection Policy

## 1. Purpose and Aim

This policy outlines Coempowered's commitment to protecting the confidentiality of sensitive information and ensuring compliance with data protection regulations. It applies to all staff, volunteers, and participants, particularly in the context of online activities, including communication platforms like Telegram.

Coempowered aims to maintain the privacy and security of all personal data collected, stored, and shared during its operations, fostering trust among participants and stakeholders.

## 2. Scope

This policy applies to:

- All personal and sensitive information related to participants, staff, volunteers, and external partners.
- Digital communications and online platforms, including but not limited to email, Telegram, and other messaging apps.
- All educational activities, meetings, and interactions conducted online.

## 3. Key Principles

1. **Confidentiality:**
  - a. Protect the privacy of individuals by ensuring their personal and sensitive information is handled responsibly.
2. **Transparency:**
  - a. Clearly communicate how data is collected, used, and stored.
3. **Accountability:**
  - a. Ensure that all staff, volunteers, and participants understand their responsibilities in maintaining confidentiality and data protection.
4. **Secure Use of Online Platforms:**

- a. Promote the safe use of online tools, including Telegram, to safeguard participants' privacy.

## **4. Procedures**

### **4.1 Data Collection and Storage**

1. Collect only the minimum personal information required for program delivery (e.g., names, contact details, and learning progress).
2. Store all data securely, using encrypted digital storage solutions and access control measures.
3. Ensure that paper records (if any) are scanned and destroyed after digitization to maintain security.

### **4.2 Data Sharing**

1. Personal data should only be shared:
  - a. With authorized personnel who require it for program delivery.
  - b. When required by law or with explicit consent from the individual.
2. Sharing via online platforms such as Telegram must be done carefully to avoid exposing sensitive data.
  - a. Use group privacy settings to prevent unauthorized access.
  - b. Avoid sharing personal details (e.g., phone numbers, addresses) in group chats.

### **4.3 Handling Online Communication (e.g., Telegram Group)**

1. The group admin (teacher or staff member) is responsible for moderating content and ensuring the group remains a safe space.
2. Participants should be reminded:
  - a. Not to share personal or sensitive information publicly within the group.
  - b. To report inappropriate or suspicious behavior to the group admin immediately.
3. Telegram group settings must be configured to restrict new participants from adding others or modifying group settings.

#### **4.4 Confidentiality in Educational Activities**

1. Ensure that all online sessions are conducted using secure platforms.
2. Do not record sessions unless absolutely necessary and with prior consent from all participants.
3. Maintain confidentiality when discussing participants' progress or personal circumstances.

#### **5. Responsibilities**

1. **Staff and Volunteers:**
  - a. Familiarize themselves with data protection principles and ensure compliance.
  - b. Report any breaches or concerns to the designated responsible officer.
2. **Responsible Officer :**
  - a. Monitor compliance with this policy.
  - b. Investigate and respond to data breaches or incidents.
3. **Participants:**
  - a. Respect the confidentiality of others and use online platforms responsibly.

#### **6. Breach Management**

1. **Identifying a Breach:**
  - a. A data breach may include unauthorized access, sharing of personal information, or loss of data.
2. **Reporting a Breach:**
  - a. All breaches must be reported immediately to the responsible officer.
3. **Response to Breaches:**
  - a. The responsible officer will investigate the breach and take appropriate corrective actions, including notifying affected individuals if necessary.
  - b. Severe breaches may be reported to relevant regulatory authorities.

#### **7. Compliance and Legal Framework**

Coempowered adheres to the following data protection principles and regulations:

1. GDPR (General Data Protection Regulation)
2. Ensure all activities, including those on Telegram, comply with these regulations to protect the privacy and rights of participants.

## **8. Contact Details**

### **Responsible Officer :**

Name: [Insert Name]

Contact: [Insert Email/Phone]

Participants, staff, and volunteers are encouraged to contact the responsible officer for any questions or concerns about data protection or confidentiality.

## **9. Review and Updates**

This policy will be reviewed annually or sooner if necessary to ensure continued compliance with evolving data protection regulations and online safety best practices.