



WRAGBY PRIMARY SCHOOL CONFIDENTIALITY POLICY

Wragby Primary School

Confidentiality Policy

Aim

To protect the child at all times and to give all staff involved clear, unambiguous guidance as to their legal and professional roles and to ensure good practice throughout the school which is understood by pupils, parents/ carers and staff.

Wragby Primary School seeks to put the child at the heart of the learning process and to provide a safe and secure learning environment. It is committed to developing creative and positive ways for the child's voice to be heard whilst recognising the responsibility to use, hold and safeguard information received.

Sharing information unnecessarily is an erosion of trust. The school is mindful that it is placed in a position of trust by all stakeholders and there is a general expectation that a professional approach will be used in all matters of confidentiality.

This policy applies to all staff employed by the school, including temporary, voluntary and agency staff. It also applies to governors, volunteers, visitors on work experience placements and parent helpers.

Objectives

1. To provide consistent messages in school about handling information about children once it has been received.
2. To foster an ethos of trust within the school.
3. To ensure that staff, parents and pupils are aware of the school's confidentiality policy and procedures.
4. To reassure pupils that their best interests will be maintained.
5. To encourage children to talk to their parents and carers.
6. To ensure that pupils and parents/ carers know that the school staff cannot offer unconditional confidentiality.
7. To ensure that there is equality of provision and access for all including rigorous monitoring of cultural, gender and special educational needs and disabilities.
8. To ensure that if there are child protection issues then the correct procedure is followed.
9. To ensure that confidentiality is a whole school issue and that in lessons ground rules are set for the protection of all.
10. To understand that health professionals are bound by different codes of conduct.
11. To ensure that parents have a right of access to any records the school may hold on their child but not to any other child that they do not have parental responsibility for.

Guidelines

- All information about individual children is private and should only be shared with those staff that have a need to know.
- All social services, medical and personal information about a child should be held in a safe and secure place which cannot be accessed by individuals other than school staff.
- The school continues to actively promote a positive ethos and respect for the individual
 - a) The school has appointed a senior lead teacher and two deputies for child protection who receive regular training.
 - b) There is clear guidance for the handling of child protection incidents. All staff have regular training on child protection issues.
 - c) There is clear guidance for procedures if a member of staff is accused of abuse.
 - d) Staff are aware that effective sex and relationship education, which brings an understanding of what is and is not acceptable in a relationship, can lead to a disclosure of a child protection issue.
 - e) Staff are aware of the need to handle all issues about different types of families in a sensitive manner.
 - f) Any intolerance about gender, faith, race, culture or sexuality is unacceptable and should follow the schools discipline policy.
 - g) Information collected for one purpose should not be used for another.
- Parents/ carers and children need to be aware that the school cannot guarantee total confidentiality and the school has a duty to report child protection issues.

- The school prides itself on good communication with parents and carers and staff are always available to talk to children and parents/ carers about issues that are causing concern. The school encourages children to talk to parents/ carers about issues causing them concern and may in some cases support the children to talk to their parents. The school would share with parents any child protection disclosure before going on to inform the correct authorities.
- Parents/ carers and children should feel reassured that in exceptional circumstances, confidentiality will be broken.
- All children have the right to the same level of confidentiality irrespective of gender, race, religion, medical concerns, special educational needs and disabilities. A lot of data is generated in schools by these categories but individual children should not be able to be identified.
- The school has appointed a senior member of staff and two deputies as Child Protection Officers. Child protection procedures are understood by staff and training is undertaken every year for all staff.
- Confidentiality is a whole school issue. Clear ground rules must be set for any classroom work such as circle time and other PHSE session dealing with sensitive issues such as sex and relationship, and drugs. Strategies are in place and all children are aware of them for dealing with sensitive information which might fall outside the boundaries of child protection procedures. School needs to be proactive so children feel supported but information is not unnecessarily revealed in a public arena. Even when sensitive information appears to be widely known, it should not be assumed by those immediately involved that it is appropriate to discuss or share this information further.
- Health professionals have their own code of practice dealing with confidentiality. Staff should be aware of children with medical needs and the class information sheet should be accessible to staff who need that information but not on general view to other parents/ carers and children.
- Photographs of children should not be used without parents/ carers permission especially in the press and internet. At no time should the child's full name be used with a photograph so that they can be identified. The school gives clear guidance to parents about the use of cameras and videos during public school events.
- Information about children will be shared with parents but only about their child. Parents should not have access to any other child's books, marks and progress grades at any time, especially at parent's evening. However parents should be aware that information about their child will be shared with the receiving school when they change school.
- All personal information about children, including social services records, should be regarded as confidential. It should be clearly understood by those who have access to it, and whether those concerned have access to all, or only some of the information.
- Information regarding health reports such as speech therapy, medical reports, SEN reports, SEN minutes of meetings and social services minutes of meetings and reports will be circulated in envelopes and once read should be returned for secure filing.
- Logs of administration of medication to children should be kept secure and each child should have their own individual log.
- In all other notes, briefing sheets, etc, a child should not be able to be identified. Addresses and telephone numbers of parents and children will not be passed on except in exceptional circumstances or to a receiving school.
- Governors need to be mindful that from time to time issues are discussed or brought to their attention about staff and children. All such papers should be marked as confidential and should be copied onto different coloured paper. These confidential papers should be destroyed. Governors must observe complete confidentiality when asked to do so by the governing body, especially in relation to matters concerning individual staff, pupils or parents. Although decisions reached at governors' meetings are normally made public through the minutes or otherwise, the discussions on which decisions are based should be regarded as confidential. Governors should exercise the highest degree of prudence when discussion of potentially contentious issues arises outside the governing body.

Types of confidential information

Information that is regarded as confidential can relate to:

1. A variety of people e.g.
 - pupils;
 - parents;
 - staff/colleagues;
 - governors;
 - job applicants.
2. A variety of matters, e.g.
 - home addresses & telephone numbers;
 - conduct and performance;
 - performance & development review/performance management;
 - health/medical;
 - pay and contracts;
 - references;
 - internal minutes, memos etc.;
 - confidential budgetary or policy information;
 - other personal information.

These lists are not exhaustive but will extend to cover any other information of a sensitive nature relating to employees, pupils and others connected with the school and to the work of the school itself.

Potential recipients of information

Within the course of daily operation, information related to the school, or those connected to the school, may be requested by, or supplied by, or passed to a range of people. This might include:

- internal colleagues (teachers, support staff, governors);
- colleagues in other schools;
- management teams;
- pupils;
- governors;
- trade unions/professional associations;
- parents;
- partner organisations (LA, DfE, Teachers' Pensions);
- other external organisations;
- the public;
- the press;
- contractors/potential contractors.

Great care must be taken by both the recipient and the supplier of information to ensure that it is dealt with in a sensitive manner.

Particular responsibilities

- If someone requesting information is not known to staff, particularly in the case of telephone calls, his/her identity and the legitimacy of his/her request should be verified by calling them back. A person with genuine reasons for seeking information will never mind this safety measure.
- Wherever possible, a response to requests for information should only be given when the request has been made in writing e.g. employee references.
- The same principle applies when sending emails. Staff should always check that the information is going to the correct person and is marked confidential where appropriate.
- **Being known as an employee of the school may mean being asked for information, for instance, by parents about a member of staff who is off sick. Although this can be awkward, parents must be informed that employees are unable to discuss confidential school matters. Persistent enquiries should be referred to the Headteacher.**
- The Data Protection Act refers to the principle of third party confidentiality. Information relating to, or provided by, a third party should not be released without the written consent of the third party or unless an order for disclosure is made by a court of competent jurisdiction.

Where they are unsure what to do, staff should refer the matter to the Headteacher or, in her absence the deputy headteacher, for guidance.

The form confidential information can take

Confidential information can take various forms and be held and transmitted in a variety of ways, e.g.

- manual records (files);
- computerised records, disks and memory sticks;
- written reports/minutes/agendas/file notes etc.;
- letters, memos, messages;
- telephone calls;
- face-to-face;
- email;
- Intranet/internet.

The methods of acquiring information can also vary.

Individuals and groups may become aware of confidential information in the following ways:

- access is gained as part of the employee's day to day work;
- information is supplied openly by an external third party;
- employees may inadvertently become aware of information;
- information may be disclosed.

Particular responsibilities

- Employees should be aware that they may have disclosed to them sensitive information in the course of their work or outside. In some circumstances the individual may request that the information remains confidential.
- Staff will also need to be aware that they may be obliged to disclose certain information e.g. relating to child protection issues and should make it clear to the individual either that confidentiality cannot be guaranteed and/or direct them to a more appropriate officer or decline to receive the information. Employees should use their discretion regarding these matters, should refer to appropriate procedures and, if in doubt, should seek advice from the Headteacher.

Responsibility of individuals in possession of sensitive information

All information received in the course of employment, no matter how it is received, should be regarded as sensitive and confidential. While it is often necessary to share such information, in doing so, employees should consider the following key points.

1. The nature of the information:
 - how sensitive is it?
 - how did it come to your attention?
2. The appropriate audience:
 - who does the information need to be shared with?
 - for what purpose?
 - who is the information being copied to? Why?
 - does restriction of access need to be passed on to your audience?
3. The most appropriate method of communication:
 - verbal;
 - written;
 - email;
 - in person.
4. The potential consequences of inappropriate communication.

It is also an individual employee's responsibility to safeguard sensitive information in their possession.

Particular responsibilities

Sensitive information should be kept secure.

- Filing cabinets should be kept locked when unattended.
- Child protection information is kept in a separate, secure filing cabinet.
- Sensitive information should not be left on desks or the photocopier/printer.
- Papers should not be left lying around at home or in the car. If confidential materials or paperwork are taken out of the office, precautions must be taken to ensure that they are not accessible to third parties.
- Appropriate steps should be taken to keep track of files which are on loan or being worked on i.e. a record of the date sent and the recipients name and position.
- If it is necessary to supply personal files through the external mail, this must be sent by recorded delivery.
- Copies of emails should be stored securely.
- Steps should be taken to ensure that private/confidential telephone calls/conversations are not overheard.
- Meetings where sensitive or confidential information is being discussed should be held in a secure environment.
- Confidential paperwork should be disposed of correctly either by shredding and recorded appropriately inline with the GDPR Policy.
- Personal data should not be used for training or demonstration purposes where fictitious data can be used.

Computer data should not be left exposed to others' view when unattended.

- Screen savers should be used when computers are unattended.
- Machines should be switched off over night.

Computer files should be kept securely.

- Passwords should be used and these should not be disclosed to colleagues unless absolutely necessary.
- Passwords should be changed periodically (at least every 6 months).
- Sensitive data should not be stored on public folders.
- Staff should be familiar with the security of email/internet systems.
- Staff should use the school email service for all school related emails
- Access to individual's computers should be restricted.
- Any user Id's and passwords used for the internet should remain confidential.
- All work carried out on a computer should be stored safely either in a personal directory within the G:drive, or onto an encrypted memory stick, which should be kept securely.
- Computer files should be backed up regularly.

A variety of phrases may be used on correspondence to denote confidentiality. As a general rule:

- Post marked 'personal' or 'for the attention of the addressee only' should only be opened by the addressee personally;
- Post marked 'private' and/or 'confidential' may be opened by those responsible for distributing the post within the school.

Confidential mail, which is then forwarded internally, should continue to carry a confidential tag.

Other responsibilities

- Employees should have regard to potential difficulties which may arise as a result of discussions outside work. While it is natural (and indeed can be therapeutic) to talk about work at home or socially, staff should be cautious about discussing specific and sensitive matters and should take steps to ensure that information is not passed on. Staff should be particularly aware that many people have a direct interest in education and schools and even close friends may inadvertently use information gleaned through casual discussion.
- Personal (e.g. home addresses and telephone numbers) and work-related information (e.g. salary details, medical details) relating to individuals, should not be disclosed to third parties except where the individual has given their express permission (e.g. where they are key holders) or where this is necessary to the particular work being undertaken, e.g. it is necessary for an individual to be written to.
- The Headteacher should comply with the procedures for the storage and sharing of information relating to individuals' Performance Management Appraisal Reviews.
- Personal and case files should not normally be shared with third parties other than the Deputy Head teacher and those responsible for writing references. Exceptions may apply in the case of legal proceedings.

Employees should use their discretion in these matters and if in doubt, should seek advice from the Headteacher.

The consequences of revealing confidential information without authority

Staff should ensure that they are familiar with this Confidentiality Policy and related Policies, for example GDPR Policy. While there is an expectation that staff will use their professional discretion in applying the Policy, they should always seek advice from the Headteacher where they are unsure.

Staff should be aware that serious breaches of the Policy may result in disciplinary action being taken. The severity of the sanction will be assessed with regard to the potential harm the disclosure will have caused to the individual concerned. Some breaches of confidentiality could be regarded as potential serious or gross misconduct that could result in dismissal.

Conclusion

Wragby Primary School has a duty of care and responsibility towards pupils, parents/ carers and staff. It also needs to work with a range of outside agencies and share information on a professional basis. The care and safety of the individual is the key issue behind this document.

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