



SEA MILLS PRIMARY SCHOOL

Aspire • Believe • Succeed

Confidentiality Policy

Reviewed and approved by:	Resources Committee
Date approved:	30 June 2021
Date of next review:	June 2023

Equality Impact Assessment (EIA) Part 1: EIA Screening

Policies, Procedures or Practices	Confidentiality Policy	Date	June 2021
EIA CARRIED OUT BY:	Andrew Kinnear	EIA APPROVED BY:	

Groups that may be affected:

Are there any concerns that the policy could have a different impact on any of the following groups? (please tick the relevant boxes)	Existing or potential adverse impact	Existing or potential for positive impact
Age (young people, the elderly: issues surrounding protection and welfare, recruitment, training, pay, promotion)		X
Disability (physical and mental disability, learning difficulties; issues surrounding access to buildings, curriculum and communication).		X
Gender Reassignment (transsexual)		X
Marriage and civil partnership		X
Pregnancy and maternity		X
Racial Groups (consider: language, culture, ethnicity including gypsy/traveller groups and asylum seekers)		X
Religion or belief (practices of worship, religious or cultural observance, including non-belief)		X
Gender (male, female)		X
Sexual orientation (gay, lesbian, bisexual; actual or perceived)		x

Any adverse impacts are explored in a Full Impact Assessment.

Purpose

We are committed to the provision of a safe and secure learning environment for every child and respect every individual's and family's right to privacy whilst ensuring that we offer high quality care and education. All of our staff, volunteers and visitors are expected to work within the guidelines of this policy that conforms to recent legislation and government guidelines.

We recognise our responsibilities relating to holding, using and safeguarding information received. In practice this means:

- Making it clear that information is shared on a 'need to know' basis.
- Not discussing personal information relating to any of our stakeholders (i.e. those who are connected with our school) in a general way or where it may be overheard.
- Keeping all personal records confidential.
- Using teaching methods which protect confidentiality.

Aims

Through the implementation of our Confidentiality Policy we will ensure that:

- Stakeholders are protected at all times.
- All staff and visitors have clear, unambiguous guidance as to their legal and professional roles.
- Good practice is shared and understood by all stakeholders.

We will achieve our objectives through:

- Issuing clearly defined procedures.
- Providing consistent messages in our school relating to handling information, once it has been received, providing training where necessary.
- Fostering an ethos of trust within our school.

Procedures

1. All information about individual stakeholders, however obtained (e.g. from personal records/through observation/through meetings/through situations that arise during class, playtime or outside our premises), is private and will only be shared with those who have a need to know (i.e. those who need the information in their professional capacity). Information which relates to any individual stakeholder or brings our school into disrepute will never be posted or shared online, through any means including all areas of social media (e.g. Facebook, Twitter, etc.). Staff, regular visitors and volunteers understand that this is a requirement during and after their time at our school and confirm this through signing a statement of confidentiality (Appendix 1).
2. Even when information appears to be widely known, it will not be assumed by those immediately involved that it is appropriate to discuss or share this information further.
3. All social services, medical and personal information will be held in a safe and secure place which cannot be accessed by individuals other than nominated school staff. It will be considered whether the staff concerned have access to all, or only some, of the information.

4. Personal information such as social services reports, speech therapy, medical reports, SEND reports, minutes of meetings etc. will be circulated, where necessary, in sealed envelopes and once read will be returned to the appropriate person for secure filing.
5. Correspondence to parents/carers relating to social services, medical and personal information will be handed directly to the parent/carer, not via book bags.
6. Confidentiality will be maintained when distributing class information. Only school email will be used when sharing information about children.
7. Logs of administration of medication to children will be kept secure and each child will have their own individual log.
8. An appointed Designated Senior Person (DSP) receives regular training (business manager). Child protection procedures are understood by all staff and training is undertaken regularly.
9. Adults are aware of the procedures relating to allegations against a member of staff.
10. Staff are always available to talk to both children and parents/carers about issues that are causing concern. We encourage children to talk to parents/carers about issues and may, in some cases, support children to talk to their parents/carers.
11. Parents/carers and children will be made aware that our school cannot guarantee total confidentiality and we have a duty to report child protection issues. Any child protection disclosure will be shared with parents/carers before we inform the correct authorities unless we believe that this puts the child at greater risk.
12. Data generated by our school will be anonymised where necessary to ensure confidentiality. Information collected for one purpose will not be used for another.
13. Where staff need to take personal data off-site, this will be stored on encrypted USB devices.
14. Where staff need to work on personal data off-site, only school laptops will be used. These are password protected.
15. Clear ground rules will be set for any classroom work such as circle time and other PHSE sessions dealing with sensitive issues such as sex and relationship and drugs. Staff are aware that effective sex and relationships education which brings an understanding of what is and is not acceptable in a relationship, can lead to disclosure of a child protection issue. Strategies are in place for dealing with sensitive information which may fall outside the boundaries of child protection procedures. Staff will be proactive so children feel supported but information is not unnecessarily revealed in a public arena.
16. Photographs or video of children will not be used without parents/carers permission and our policy on the use of images of children will be adhered to at all times.

17. We ensure that parents/carers have a right of access to any records the school may hold on their child, within legislative requirements. Parents/carers will not have access to any other child's books, marks and progress grades at any time. Parents/carers will be made aware that information about their child will be shared with the receiving school/setting when they change school/setting.
18. Only those identified on our school data system as having parental responsibility will be contacted in relation to their child. Should there be any concerns, this will be referred to the DSP before a parent/carer is contacted.
19. Governors will be mindful that from time to time issues are discussed, or will be brought to their attention, about staff and children. All papers will be marked as Confidential. These confidential papers will be destroyed after meetings. Governors will observe complete confidentiality when asked to do so by the Governing Body, especially in relation to matters concerning individual staff, children or parents/carers. Although decisions reached at governors' meetings are normally made public through the minutes or otherwise, the discussions on which decisions are based will be regarded as confidential. Governors should exercise the highest degree of prudence when discussion of potentially contentious issues arises outside Governing Body meetings.
20. Health professionals have their own code of practice dealing with confidentiality.
21. All requests for information (about our school or stakeholders) by an outside agency or the media will not be commented on by the person to whom the request was made, but will be referred immediately to the Headteacher.
22. All transferring files will be sent recorded delivery. Any sensitive files, including safeguarding files will be sent with a safeguarding cover sheet (this can be found in the Child Protection and Safeguarding file).
23. Staff with children in the school may become aware of information about their child that may not ordinarily have been shared with them. In your professional role you must be sensitive to conflict of interest and deal with this information as you would any other child in the school. Your position in the school cannot be used to gain information for your own purposes. The school's procedures must be followed at all times.

Monitoring and Evaluation

Confidential files to be monitored by the Safeguarding Governor annually. This includes:

- Child protection files
- Staff and stakeholder contact information
- Children's files
- Signed statements

This will be included in a Safeguarding Governor report to the Resources Committee.

Related policies and documents:

Behaviour for Learning

Data Protection

Equality

Privacy notices

Relationships and Sex Education

Safeguarding and Child Protection

Whistle-blowing

Related Legislation:

Human Rights Act 1998: Gives everyone the right to “respect for his private and family life, his home and his correspondence”, unless this is overridden by the ‘public interest’, e.g. for reasons of Child Protection, for the protection of public safety, public order, health or morals or for the rights and freedoms of others.

UK GDPR and Data Protection Act 2018: Applies to: personal data of living, identifiable individuals (not anonymised data); manual and electronic records. Schools need to be clear, when collecting personal data, of the purposes for which it will be used and should have policies to clarify this to staff, pupils and parents/carers.

Freedom of Information Act 2000: Amends the Data Protection Act. Gives everyone the right to request any records a public body, including schools, holds about them. A school may withhold information it has, if it is considered the information may damage the recipient if disclosed. Schools’ Data Protection policy should also cover the requirements of this Act.

Appendix 1

Sea Mills Primary School Statement of Confidentiality

All members of staff, regular visitors and volunteers are required to sign the annual Declaration Form to confirm agreement to the following statement relating to confidentiality.

I have read and understood the Confidentiality Policy and agree to adhere to this in my role at Sea Mills Primary School, during my time at the school and after I have left. I recognise that I am in a position whereby, at certain times, I may have access to information concerning individual stakeholders.

I agree to only discuss information relating to Sea Mills Primary School and respective stakeholders on a 'need to know' basis, as defined in the policy.

I agree not to post or share information online through any means, including all areas of social media (e.g. Facebook, Twitter, etc.), which relates to any individual stakeholder or brings Sea Mills Primary School in disrepute.

I agree to refer all requests for information by an outside agency or the media to the Headteacher.