

GDPR Policy: Confidentiality Policy 23/24



Document Control

A. Confidentiality Notice	This policy document has been approved by the Governing Body of St Modwen's Catholic Primary School and is intended for internal and/or external publication. Where the document is identified for internal use the policy information may not be shared with external agencies or parents without the prior agreement of the Headteacher or authorizing committee.				
B. Document Details	Classification:		Premises, Health and Safety Committee		
	Policy Source:		John Walker (Data Protection Officer) May 2023 Version		
	Organisation:		St Modwen's Catholic Primary School		
	Documents reference:		Policy number: STM48		
	Current Version Number:		V1(4 pages)		
	Current Document Approved by: (Committee)		PH & S		
	Date Approved:		Autumn 2 Term 2023		
	Statutory Policy		Yes		
	Internal/External Policy (published on website)		External – Publish on website		
	Schedule Review:		Next Review date:	Review cycle	
			Autumn Term 2 2024	Annually	
C. Version Control Document revision and Approval History	Version	Date	Version created by:	Version approved by:	Comments
	V1	7.11.2023	School	PH & S	Revised August 2023 – John Walker Policy 13.5.2023 refresh Amends: 9. GDPR Linked policies p4

D. Contents	Section	Page No
	1. Aim	2
	2. Rationale	2
	3. Objectives	2-3
	4. Guidelines	3
	5. Day to day practice	3
	6. Governors/Trustees	3-4
	7. Monitoring and Evaluation	4
	8. Conclusion	4
	9. GDPR related policies	4

Confidentiality Policy

1. Aim

To ensure that confidentiality and Data Protection Compliance are a natural part of good practice. To provide all staff, governors and others in school clear, unambiguous guidance as to their legal and professional roles. To make certain that the procedures throughout the school can be easily understood by pupils, parents/carers and staff.

2. Rationale

Schools hold a lot of confidential information about children, staff and sometimes parents and carers. Whilst it is important that we continue to develop positive ways to use that information, we all recognise that it is our responsibility to use, hold and safeguard information received.

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. Our obligation to comply with the Data Protection Act 2018, the UK GDPR and other legislation and statutory guidance underpins our management of data.

3. Objectives:

- To provide consistent messages in school about handling information about children and adults once it has been received.
- To foster an ethos of trust within the school.
- To ensure that staff, governors, volunteers, students, parents, and pupils are aware of the school's confidentiality policy and procedures.
- To reassure pupils that their best interests will be maintained.
- To encourage pupils to talk to their parents and carers.
- To ensure that pupils and parents/carers know that school staff cannot offer unconditional confidentiality.
- To ensure that if there are child protection issues then the correct procedure is followed.

- To ensure that confidentiality is a whole school issue and that everyone understands their personal responsibilities.

4. Guidelines

- All information about individuals 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.
- The Safeguarding Policy will be applied, and monitored by appropriate school personnel.
- All children and adults have a right to the same level of confidentiality irrespective of gender, race, religion, medical concerns, and special educational needs.

5. Day to Day Practice

Confidentiality is a whole school issue. 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.

Information about children will be shared with parents and carers 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 parents evening.**

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 / files and once read should be returned for secure filing.

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.

Staff should exercise prudence and consider the dignity of individuals during conversations on the school site, for example in the staff room, particularly if non -members of staff are present and in the presence of children.

Non-members of staff, for example, students and voluntary helpers, will be asked to follow the principles of the confidentiality policy and sign a confidentiality agreement.

6. Governors/Trustees

Governors/Trustees 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 after use.

Governors/Trustees must observe complete confidentiality when asked to do so by the governing body, especially in relation to matters concerning individual staff, pupils or parents.

Governors/Trustees will sign a confidentiality agreement annually.

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/Trustees should exercise the highest degree of prudence when discussion of potentially contentious issues arises outside the governing body.

7. Monitoring and Evaluation

The policy will be reviewed as part of the schools monitoring cycle.

8. Conclusion

St Modwen's Catholic 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.

Policy agreed by governors and shared with staff, volunteers and the school community.

9. GDPR Related Policies and Procedures

	Review Date
01 Data Protection Policy	September 2024
02 Breach and Non-Compliance Policy	September 2024
03 Confidentiality Policy and Confidential Agreements	September 2024
04 CCTV Policy	September 2024
05 Workforce Acceptable use Policy	September 2024
06 Freedom of Information Policy	September 2024
07 Document and Data Retention Policy	September 2024
08 Privacy Notices: <ul style="list-style-type: none"> • Pupils Data • School Trips • Staff Workforce • Governors • Job Applicants • PTA • External School Photographer 	September 2024
09 GDPR Workforce and Governor Training/CPD <ul style="list-style-type: none"> • GDPR Guidelines for staff 	September 2024
10 GDPR Checks, Compliance and Audit Toolkit (GoGDPR)	September 2024
11 GDPR Subject Access Request Management and Procedures	September 2024
12 GDPR My rights a guide for data subjects	September 2024
13 GDPR Home School Communication Charter	September 2024
14 GDPR Information Security Protocol	September 2024
15 Cyber Response Plan	September 2024