

CLANDON SCHOOL

A caring community where all can THRIVE

CONFIDENTIALITY POLICY

Reviewed	Spring 2019	Next Review	Spring 2022
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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.

Rationale

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 and visitors are expected to work within the guidelines of this policy which conform 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.
- Adhering to General Data Protection Regulations (GDPR), which were introduced on 25th May 2018.

Objectives

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.
- Publishing our Confidentiality Policy.

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).

To show understanding of the requirements to maintain confidentiality the following documents should be signed.

- Volunteers – Volunteer Agreement Form – Appendix 1
 - Governors – Code of Conduct for School Governors Form – Appendix 2
 - Staff – Staff Behaviour Policy
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, SEN 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. Logs of administration of medication to children will be kept secure and each child will have their own individual log.
 7. An appointed Designated Safeguarding Lead receives regular training. Child protection procedures are understood by all staff and training is undertaken regularly. Safeguarding and Child Protection records are kept securely and can only be accessed by DSLs.
 8. Adults are aware of the procedures relating to allegations against a member of staff.
 9. 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.
 10. 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.
 11. Data generated by our school will be anonymised where necessary to ensure confidentiality. Information collected for one purpose will not be used for another.
 12. Staff are not to use memory sticks to remove any personal data from the school. When files with personal information need to be shared, files should be password protected or shared through RM Unify
 13. Clear ground rules will be set for any classroom work such as circle time and other PSHE 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 public arena
 14. 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.
 15. 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.

16. Only those identified on our records as having parental responsibility will be contacted in relation to their child. Should there be any concerns, this will be referred to the DSL before a parent/carer is contacted.
17. 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 and copied onto different coloured paper. 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.
18. Health professionals have their own code of practice dealing with confidentiality.
19. 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.

GDPR

In line with Data protection rules, if any member of staff is aware of a possible data breach (personal data has been copied, transmitted, viewed, stolen or used by an individual unauthorised to do so) they must inform the school's DPO

When a child or adult leaves Clandon, data will only be kept for a finite period of time, in line with guidelines set out in our Data Protection and Retention Policy, before being destroyed securely.

Use of personal information beyond a child's name should be limited around the classroom and in books e.g. staff may have a list of children's names or name labels on children's books but there should not be other information linked to this such as date of birth or home address. Any documents containing a child's name and other personal information should be locked away when not in use.

Appendix 1



CLANDON C of E SCHOOL

A caring community where all can THRIVE

VOLUNTEER AGREEMENT

Thank you for visiting or offering your services as a volunteer at Clandon Church of England Primary School. Your help is greatly appreciated and we hope that you will gain much from your experience here. The class teacher has overall responsibility for the children at all times, but designates responsibility to voluntary helpers who may have charge of a small group.

Any volunteer who does not hold a DBS check must not be left alone with children and must not assist with toileting children or changing for swimming etc.

The Role of a Volunteer Helper

- To be responsible for and look after, in equal measure, all of the children that you are working with.
- To stay with your allocated child/group and ensure their well-being and safety.
- To promote polite, respectful and courteous behaviour at all times.
- To contact your class teacher or the school office if there are issues with first aid, safety or behaviour.
- To encourage children to think about the task and by helping to explain areas of interest.
- To follow guidance from school staff.

Not permitted

- Please do not bring additional siblings.
- Please do not use your mobile phone. If a call or text is urgent please move to the office.
- Volunteers are not allowed to smoke, drink alcohol or engage in any illegal practices.
- Volunteers are not allowed to take photographs of the children unless requested to do so by the teacher in charge.
- Volunteers are not allowed to bring treats for the child/group they are working with. Any treats must be for the whole class and only given in an agreement with the class teacher.

Emergencies

Please inform a member of school staff as soon as possible eg if, while you are on a school trip, you are separated from the rest of the school party.

Please read and sign this Agreement and hand it in to the school office. You will receive a copy of it for your records.

- I have received and read the Volunteer Policy.
- I agree to support the school's Ethos and Aims.
- I agree to treat information I learn from being in the school as confidential.
- I agree to the school's Safeguarding Policy. **If a child displays behaviour or tells you something, however small, that makes you concerned for their welfare please**

report it to the Designated Safeguarding Leads. If the Designated Safeguarding Leads are unavailable please speak to the school office who will be able to advise you.

DBS Check – Circle as appropriate	Yes	No	Applied
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Signed.....

Name.....

Date.....

Appendix 2



Code of Conduct for School Governors

Adapted from the National Governors Association Model Code of Conduct 2016

This code sets out the expectations on and commitment required from school governors in order for the governing board to properly carry out its work within the school and the community.

The governing board has the following core strategic functions:

Establishing the strategic direction, by:

- Setting the vision, values, and objectives for the school(s)/trust
- Agreeing the school improvement strategy with priorities and targets
- Meeting statutory duties

Ensuring accountability, by:

- Appointing the Headteacher
- Monitoring progress towards targets
- Performance managing the Headteacher
- Engaging with stakeholders
- Contributing to school self-evaluation

Ensuring financial probity, by:

- Setting the budget
- Monitoring spending against the budget
- Ensuring value for money is obtained
- Ensuring risks to the organisation are managed

As individuals on the board we agree to the following:

Role & Responsibilities

- We understand the purpose of the board and the role of the Headteacher.
- We accept that we have no legal authority to act individually, except when the board has given us delegated authority to do so, and therefore we will only speak on behalf of the governing board when we have been specifically authorised to do so.
- We accept collective responsibility for all decisions made by the board or its delegated agents. This means that we will not speak against majority decisions outside the governing board meeting.
- We have a duty to act fairly and without prejudice, and in so far as we have responsibility for staff, we will fulfil all that is expected of a good employer.
- We will encourage open government and will act appropriately.
- We will consider carefully how our decisions may affect the community and other schools.
- We will always be mindful of our responsibility to maintain and develop the ethos and reputation of our school. Our actions within the school and the local community will reflect this.
- In making or responding to criticism or complaints we will follow the procedures established by the governing board.
- We will actively support and challenge the Headteacher.

Commitment

- We acknowledge that accepting office as a governor involves the commitment of significant amounts of time and energy.

- We will each involve ourselves actively in the work of the governing board, and accept our fair share of responsibilities, including service on committees or working groups.
- We will make full efforts to attend all meetings and where we cannot attend explain in advance why we are unable to.
- We will get to know the school well and respond to opportunities to involve ourselves in school activities.
- We will visit the school, with all visits arranged in advance with the Headteacher and undertaken within the framework established by the governing board.
- We will consider seriously our individual and collective needs for induction, training and development, and will undertake relevant training.
- We accept that in the interests of open government, our full names, date of appointment, terms of office, roles on the governing board, attendance records, relevant business and pecuniary interests, category of governor and the body responsible for appointing us will be published on the school's website.
- In the interests of transparency we accept that information relating to governors will be collected and logged on the DfE's national database of governors (Edubase).

Relationships

- We will strive to work as a team in which constructive working relationships are actively promoted.
- We will express views openly, courteously and respectfully in all our communications with other governors.
- We will support the chair in their role of ensuring appropriate conduct both at meetings and at all times.
- We are prepared to answer queries from other board members in relation to delegated functions and take into account any concerns expressed, and we will acknowledge the time, effort and skills that have been committed to the delegated function by those involved.
- We will seek to develop effective working relationships with the Headteacher, staff and parents, the local authority and other relevant agencies and the community.

Confidentiality

- We will observe complete confidentiality when matters are deemed confidential or where they concern specific members of staff or pupils, both inside or outside school.
- We will exercise the greatest prudence at all times when discussions regarding school business arise outside a governing board meeting.
- We will not reveal the details of any governing board vote.

Conflicts of interest

- We will record any pecuniary or other business interest (including those related to people we are connected with) that we have in connection with the governing board's business in the Register of Business Interests, and if any such conflicted matter arises in a meeting we will offer to leave the meeting for the appropriate length of time. We accept that the Register of Business Interests will be published on the school's website.
- We will also declare any conflict of loyalty at the start of any meeting should the situation arise.
- We will act in the best interests of the school as a whole and not as a representative of any group, even if elected to the governing board.

Breach of this code of conduct

- If we believe this code has been breached, we will raise this issue with the chair and the chair will investigate; the governing board will only use suspension/removal as a last resort after seeking to resolve any difficulties or disputes in more constructive ways.

- Should it be the chair that we believe has breached this code, another governing board member, such as the vice chair will investigate.

The Seven Principles of Public Life

(Originally published by the Nolan Committee: The Committee on Standards in Public Life was established by the then Prime Minister in October 1994, under the Chairmanship of Lord Nolan, to consider standards of conduct in various areas of public life, and to make recommendations).

Selflessness – Holders of public office should act solely in terms of the public interest. They should not do so in order to gain financial or other material benefits for themselves, their family, or their friends.

Integrity - Holders of public office should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.

Objectivity - In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, holders of public office should make choices on merit.

Accountability - Holders of public office are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.

Openness - Holders of public office should be as open as possible about all the decisions and actions that they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.

Honesty – Holders of public office have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.

Leadership - Holders of public office should promote and support these principles by leadership and example.

Confirmation of compliance

I hereby confirm that I have read, understood and agree to comply with Clandon Church of England Primary School's Code of Conduct.

Name

Signed

Date

Once completed, signed and dated, please return this form to the Chair of Governors