



Clovelly House School
Stay safe, respect, achieve

Confidentiality Policy

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Policy on confidentiality

1. Introduction

The safety, wellbeing and protection of our children is the paramount consideration in all decisions staff at this school make about confidentiality. The appropriate sharing of information between school staff is an essential element in ensuring our children's wellbeing and safety. The school has a trained GDPR officer and they must be informed of any breaches of confidentiality.

2. Purpose

The purpose of this policy is to ensure that the information about the pupils and individual staff members is secure. This information is stored to facilitate the provision of education for pupils at Clovelly House School and complies with data protection regulations.

3. Information

All information about individual children is private and should only be shared with those staff who need to know. All social services, medical and personal information about a child will be held in a safe and secure place which cannot be accessed by individuals other than school staff. 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 will follow the 7 golden rules of information sharing:

1. *The data protection act* is not a barrier to sharing information – it provides a framework to ensure that information about living persons is shared appropriately;
2. *Be open and honest* with person at the outset about sharing information – seek their agreement unless it is unsafe or inappropriate to do so;
3. *Seek advice* if you are in any doubt – without disclosing the identity of the person where possible;
4. *Share with consent* where appropriate – where possible respect the wishes of those who do not consent to share their information, share information without consent if, in your judgement, the lack of consent can be overridden in the public interest, base your judgement on the facts of the case;
5. *Consider safety and wellbeing* – base your information sharing decision on considerations of the safety and wellbeing of the person and others who may be affected by their actions;
6. *Necessary, proportionate, relevant, accurate, timely and secure* – ensure that the shared information is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely fashion and is shared securely;
7. *Keep a record* – of your decision and the reasons whether or not to share information. If you decide to share, record what you have shared, with whom, and for what purpose.

4. Types of Confidential Information

4.1 Telephone calls

No information, such as personal, care or school addresses or telephone numbers are provided until clear identity of the caller is established. If there is any doubt as to who the caller is, they will either be asked to provide a phone number or to message/write it on headed paper so that they can be checked out.

No staff members' telephone numbers should be divulged under any circumstances. The caller wishing to contact a staff member, should give their details and these can be passed on the member of staff to return the call.

4.2 Computers

All computers have a security password limiting access. They are also protected from viruses by a firewall and antivirus software. (See also Staff Code of Conduct, E-Safety Policy and ICT Policy.)

All records are covered by the Data Protection Act.

4.3 Personal

There is a confidentiality clause in all staff contracts. In addition, all staff members are expected to sign a confidentiality statement. Whilst certain information about pupils needs to be appropriately handed over to staff working in Clovelly House School, this information is shared to facilitate communication and support



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for the children. Understanding of the behaviour of children and safe working practices between staff and should not be the subject of gossip.

Staff members who leave the organisation are not entitled to information about the school staff or children after they left apart from general information which is shared with members of the public. Remaining staff members who continue to be friends with those who have left should be vigilant about what information they share with ex-staff members.

Whilst it is accepted that staff will talk to their partners and colleagues generally about their work, it is also expected that there is no breach of confidentiality and no sharing of personal information about any pupils or staff members at Clovelly House.

Staff members are entitled to confidentiality about their private lives. Staff members are not permitted to share information about their personal lives with children. Colleagues are not permitted to gossip about staff members private lives. Additionally, if pupils gain access to staff members private information this must be dealt with by the management team.

4.4 Safeguarding Disclosures

If a child or young person makes a disclosure to a staff member, or if a staff member hears about a disclosure that a young person has made – this information is to remain strictly confidential. This information must be passed on the DSL, but must not be discussed among staff. Information regarding concerns about the conduct of a staff member **MUST** be reported directly to the Principal and not shared with others. Other staff members need to know that there has been a disclosure as this may affect the behaviour and well-being of the pupil, but details should not be divulged. Any discussion or speculation may impact on an official investigation. It is also poor practice as the child has a right to privacy, especially about significant events in his/her life.

4.5 Information about grievances, complaints and concerns

Staff members who raise a grievance, complaint or concern at work will have their information kept securely. The Principal and Line manager are responsible for ensuring that all details that are written down are stored securely and only shared with relevant parties. Staff members should not feel that they are unable to raise issues with their line manager and will not suffer any reparation if they should choose to raise a grievance, complaint or concern with a senior leader. The Whistleblowing Policy must be followed at all times.

5. Storage of sensitive Information

5.1 Verbal information

Meetings where sensitive or confidential information is being discussed should be held in a secure environment. Staff members should ensure that confidential phone calls and online video conference calls are not overheard by others.

5.2 Paperwork

All pupil files are kept in a locked cabinet in the office. Access can only be obtained by requesting the key from the staff. NO files or parts of files should be removed from the building without express permission from the Principal.

There are necessary records kept in the Home files of pupils which are kept in the relevant home. These files should record all basic information relevant to the young people, such as medical records, consent forms, details of belongings, etc.

Personnel files are kept in a locked cupboard in the office, Only the senior staff members can have access to this cupboard. Any supervision notes should be given to the Administrator for filing. Any confidential paperwork which is no longer required is shredded.

The following procedures must apply at all times:

- * Filing cabinets must be kept locked at all times;
- * Child protection information is kept in a separate, secure filing cabinet;
- * Sensitive information should not be left on desks or near the photocopier;

5.3 Online information



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The school uses Microsoft 'sharepoint' for storing and sharing information online. This is managed by the Bursar and Administration Team. There are areas on the 'sharepoint' for sharing information that all staff members should have access to, but there are areas which are restricted to those staff members only who need access to this sensitive information. This includes confidential staff and pupil information, safeguarding and well-being information and information about investigations, complaints, etc. Where information needs to be shared with professionals such as social services, this must be shared securely via secure sites such as 'egress'.

6. Consequences of revealing confidential information without authority

If a staff member becomes aware of a breach of confidentiality, they must inform the Bursar and/or the principal immediately. If a staff member is reporting a breach of confidentiality about another person, the Whistleblowing procedures will apply. Breaches of confidentiality will be investigated by the Principal and/or the Bursar. Depending on the circumstances of the case this may result in:

- * Further training for the staff member,
- * Disciplinary action,
- * A written warning,
- * Suspension while an investigation takes place,
- * Potential or gross misconduct resulting in Summary dismissal, and/or,
- * involvement with external authorities as required by the Data protection Act.

See also: Clovelly House School Policies and Procedures
Data Protection Act
Whistleblowing Policy