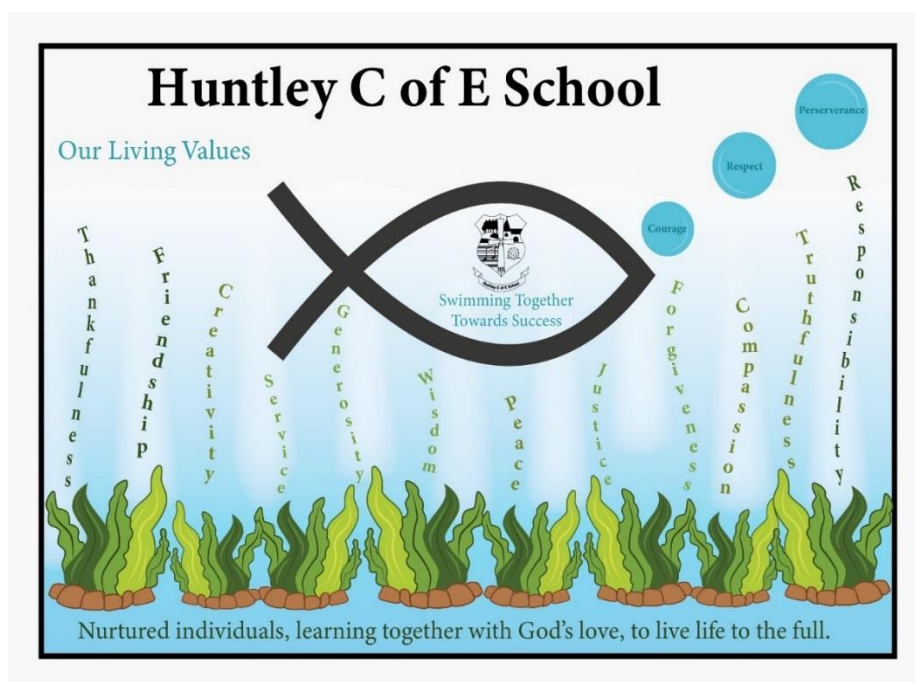




Huntley C of E Primary School

Confidentiality Policy

April 2026



Please read in conjunction with
Safeguarding and Child protection Policy
Data Protection Policy
Behaviour Policy
Anti-Bullying Policy
E-Safety and Acceptable Use Policy

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Document Reviews and Amendments

Amendment Date	Change to Document	Date of Approval
March 2018	Scheduled review	April 2018
April 2020	Updated in line with Covid 19 changes	
March 2023	Scheduled review	06/07/23 FGB meeting
April 2026	Scheduled review – policy rewritten with more comprehensive guidance	23/04/26

At Huntley CE Primary, our Christian ethos underpins all that we do. We are committed to fostering a nurturing, inclusive, and respectful environment where every member of our community is valued and treated with dignity. Our approach to confidentiality reflects our core value of respect. We recognise the importance of building trusting relationships with pupils, families, and staff, and we are guided by the teachings and values of the Church of England in all aspects of our practice.

This policy supports our vision of a school community where everyone feels safe, supported, and able to flourish. We are committed to upholding the highest standards of confidentiality, while ensuring that the safety and wellbeing of our pupils remains our foremost priority.

Rationale

The purpose of this Confidentiality Policy is to provide a clear, robust framework for the management of confidential information within Huntley School. The policy ensures that all pupils, staff, parents, governors, volunteers, and visitors understand their responsibilities regarding confidentiality, information sharing, and the protection of personal data. It is designed to safeguard the privacy and dignity of individuals, while recognising the paramount importance of safeguarding and promoting the welfare of children.

We put the child at the heart of the learning process and provide a safe and secure learning environment. We are committed to developing creative and positive ways for the child's voice to be heard whilst recognising our responsibility to use, hold and safeguard information. Sharing information inappropriately, or unnecessarily, is an erosion of trust.

This policy applies to all members of the Huntley CE Primary school community, including pupils, staff (teaching and non-teaching), governors, volunteers, supply staff, contractors, visitors, and third parties who may have access to confidential information. It covers all settings in which school activities take place, including on-site, off-site (e.g., educational visits, residential), and digital environments (such as online learning platforms, school email, and remote meetings).

The policy applies to all forms of confidential information, whether held in paper records, electronic systems, verbal communications, or visual formats (e.g., photographs and video recordings).

Statutory Duties and Legal Obligations

School has a legal duty to protect the confidentiality of personal and sensitive information relating to pupils, staff, and families. The school must ensure that information is collected, stored, processed, and shared in accordance with data protection law and statutory safeguarding guidance.

There are circumstances where confidentiality must be breached, most notably where there are safeguarding concerns. In such cases, the duty to protect a child from harm overrides the duty of confidentiality. Staff must always act in accordance with KCSIE and the "Seven Golden Rules to Sharing Information" (see Appendix A), ensuring that information is shared appropriately and securely with relevant agencies.

The school is required to maintain accurate records of disclosures, referrals, and actions taken, and to ensure that all staff understand their responsibilities regarding confidentiality and information sharing.

Guidelines

- All information about individual children is confidential and is only shared with those staff/adults that have a need to know.
- All safeguarding, medical and personal information about a child is held in a safe and secure place which can only be accessed by appropriate staff.
- We pride ourselves on good communication with parents/carers and staff are 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 causing them concern and may in some cases support the children in talking to them.
- All children have a right to the same level of confidentiality irrespective of gender, race, religion, culture, class, medical concerns and special educational needs.
- All children, parents/carers, staff members and governors must enjoy privacy from gossip. All matters are dealt with according to the school's procedures and out of the eye of the wider community. It is important that:-
- staff do not discuss details of individual cases to any person without direct professional connection to and interest in the welfare and education of the individual concerned.
- no member of staff discusses an individual child's behaviour/situation etc in the presence of another child.
- staff do not enter into detailed discussion about a child's behaviour with other children or their parents/carers.
- governors, do not divulge details about individuals (be they staff, families or individual children) to any person outside of the meeting.

- staff performance management is carried out confidentially.
- matters of child protection are made known to staff on a need to know basis.
- class teachers and support staff are aware of some confidential matters in order to support individual children and adults. These staff will respect the sensitivity of such cases and not divulge information to people unconnected professionally with the individual concerned.
- volunteers, such as parents/carers and friends of the school do not discuss school matters in the wider community
- volunteers, students and supply teachers read this policy before working in school.
- Staff should be aware of children in their care with medical needs. This information is accessible to staff who need it but is not on general view to other parents/carers and children.
- Photographs of children are not used without parents/carers' permission.
- Governors must observe complete confidentiality, 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 are regarded as confidential. Governors should exercise the highest degree of prudence when discussion of potentially contentious issues arises outside of the governing body.

Roles and Responsibilities

Governing Body

The Governing Body holds overall responsibility for ensuring that this policy is implemented effectively and complies with all relevant legislation and statutory guidance. Governors monitor the school's arrangements for managing confidential information, receive regular reports on safeguarding and data protection in full governors' meetings and ensure that the policy is reviewed and updated as required.

Headteacher

The Headteacher is responsible for the day-to-day implementation of this policy, ensuring that all staff, volunteers, and visitors understand and adhere to its requirements. The Headteacher oversees staff training, monitors compliance, and ensures that breaches of confidentiality are managed appropriately. The Headteacher also liaises with the Governing Body, the Designated Safeguarding Lead, and external agencies as necessary.

Designated Safeguarding Lead (DSL)

The DSL has lead responsibility for managing confidential information in safeguarding contexts. The DSL ensures that disclosures are handled sensitively and in accordance with statutory guidance, that information is

shared with relevant agencies where necessary, and that accurate records are maintained. The DSL provides advice and support to staff, delivers training, and ensures that safeguarding concerns are addressed promptly and effectively.

All Staff and Volunteers

All staff and volunteers have a duty to maintain the confidentiality of personal and sensitive information. This includes not discussing confidential matters outside of school, only sharing information with colleagues or external agencies on a need-to-know basis, and following school procedures for handling disclosures. Staff must be alert to situations where confidentiality may need to be breached for safeguarding reasons and must seek guidance from the DSL or Headteacher if unsure.

Other Professionals

Multi-agency professionals are bound by their professional codes of conduct to maintain confidentiality.

Data Protection Officer

A Data Protection Officer (DPO) is appointed, externally through School Pro and they are responsible for overseeing the school's compliance with data protection law, advising on information sharing, and supporting staff in understanding their obligations. The DPO conducts audits, monitors data handling practices, and acts as a point of contact for data protection queries.

Limits to Confidentiality

While we are committed to maintaining confidentiality wherever possible, there are clear limits to this commitment. The safety and welfare of children is our highest priority, and there are circumstances where confidentiality must be breached in order to protect a child or others from harm. In line with KCSIE and statutory safeguarding guidance, staff must share information with the DSL or external agencies if they have concerns about a child's safety or wellbeing, even if the child or family has requested that the information remain confidential.

Other situations where confidentiality may need to be breached include compliance with legal requirements (e.g., court orders, police investigations) or where there is a risk of serious harm to an individual or the wider community. In all cases, the decision to share information will be made carefully, with due regard for the rights and interests of those involved, and will be documented appropriately.

In the following circumstances, we will **always** break confidentiality:

- Threat to the life of or immediate risk to the pupil
- Prevention of terrorism
- A third party is at risk of abuse or neglect
- When you have been subpoenaed to a Court of Law
- When the student has been sexually, physically or emotionally abused.
- When the teacher has the expressed consent of the student

Managing Confidential Information

Receiving and Handling Disclosures

When a pupil, parent, or staff member makes a disclosure of confidential information, staff must respond with sensitivity, empathy, and professionalism. Staff should:

- Listen carefully and without judgement, allowing the individual to speak freely.
- Reassure the individual that their information will be treated with respect, but make clear that confidentiality cannot be guaranteed if there are safeguarding concerns.
- Avoid making promises they cannot keep, such as absolute confidentiality.
- Record the disclosure promptly, accurately, and in the individual's own words, using the school's agreed recording systems.
- Report the disclosure to the DSL or Headteacher as soon as possible, following the school's safeguarding procedures.
- Not discuss the disclosure with others except on a need-to-know basis.

Staff should be aware that disclosures may occur in a variety of contexts, including face-to-face conversations, written communications, or digital platforms. All disclosures must be handled in accordance with this policy and statutory guidance.

Information Sharing Principles

Huntley CE Primary school adopts the "Seven Golden Rules to Sharing Information" as set out in DfE guidance (see Appendix A). These principles guide our approach to information sharing, ensuring that decisions are made lawfully, proportionately, and in the best interests of children and others. We recognise the importance of balancing the right to confidentiality with the duty to protect, and we are committed to sharing information appropriately, securely, and only with those who have a legitimate need to know.

Record-Keeping and Storage

Confidential records must be stored securely, whether in paper or electronic form. Paper records are kept in locked cabinets in secure areas, accessible

only to authorised staff. Electronic records must be protected by strong passwords and encryption and stored on secure school servers or approved cloud services. The staff T drive is a secure site.

The school will adhere to statutory retention periods for confidential records, as set out in data protection law and relevant guidance. When records are no longer required, they will be disposed of securely, in accordance with the school's data protection and record retention policies.

Access to confidential records is strictly limited to those with a legitimate need to know, such as the DSL, Headteacher, and relevant safeguarding staff. All access and actions taken must be logged and monitored.

Safeguarding, medical and behavioural concerns are to be logged on CPOMs.

Information Sharing and Referrals

Information may need to be shared with external agencies, such as children's social care, the police, health services, or the Safeguarding Children Partnership in order to safeguard children or comply with legal requirements.

The following procedures apply:

- Staff must consult with the DSL or Headteacher before sharing information externally, unless there is an immediate risk of harm.
- The school will seek consent to share information wherever possible, unless doing so would place a child at risk or undermine a police investigation.
- Where consent is not required (e.g., safeguarding concerns), information will be shared lawfully, proportionately, and only with those who need to know.
- All decisions to share or withhold information will be documented, including the rationale, what was shared, with whom, and when.
- The school will use secure methods to share information, such as encrypted email or secure portals.

The DSL is responsible for making referrals to external agencies and ensuring that all relevant information is provided in a timely and appropriate manner.

The information sharing flow chart (Appendix C) can be used to inform decision making.

Responding to Requests for Information

Parents, carers, and external agencies may request access to information held by the school. The following procedures apply:

- Requests for information will be handled in accordance with the Data Protection Act 2018, UK GDPR, and the Freedom of Information Act 2000.
- Subject Access Requests (SARs) from individuals seeking access to their own or their child's personal data will be managed by the DPO or Headteacher, who will ensure that information is provided within statutory timescales and that any exemptions (e.g., safeguarding) are applied appropriately.
- Requests from external agencies (e.g., police, social care) will be referred to the DSL or Headteacher, who will determine whether information can be shared lawfully and in the best interests of the child.
- All requests and responses will be logged and retained in accordance with data protection requirements.

Communication

Huntley CE Primary is committed to being open and transparent with pupils, parents, carers, and staff about how confidential information is managed. The school provides a clear privacy notice (see Appendix B) and makes this policy available on the school website and on request.

Pupils are taught about confidentiality and information sharing as part of the curriculum, including in RSHE and safeguarding lessons, in a manner appropriate to their age and understanding.

Involving Parents and Carers

The school recognises the vital role of parents and carers in supporting the wellbeing and development of pupils. Wherever appropriate, and unless it would place a child at risk, parents and carers will be involved in decisions about the sharing of confidential information relating to their child.

The school adopts a partnership approach, engaging with families and the wider community in a manner consistent with our Christian ethos and inclusive values. Where it is not possible or appropriate to involve parents (e.g., where there are safeguarding concerns), the rationale will be clearly documented, and support will be provided to the pupil as needed.

Managing Breaches

Any breach of confidentiality, whether accidental or deliberate, is taken extremely seriously. All breaches must be reported immediately to the Headteacher and, where relevant, the DPO and DSL.

The school will investigate all breaches promptly and thoroughly, in accordance with data protection and safeguarding procedures. Where a breach involves personal data, the school will assess the risk to individuals

and, if required, report the breach to the Information Commissioner's Office (ICO) within statutory timescales.

Disciplinary action may be taken against staff or volunteers who breach confidentiality, in line with the Staff Code of Conduct. Where a breach involves a safeguarding concern, the school will follow its safeguarding procedures and liaise with external agencies as appropriate.

Review Arrangements

This policy is reviewed annually, or sooner if there are significant changes in legislation, statutory guidance, or best practice. Updates are approved by the Governing Body and communicated to the school community.

Appendix A:

CONFIDENTIALITY

Seven Golden Rules to Sharing Information

1. Remember that the Data Protection Act 2018 and UK GDPR are not barriers to sharing information, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family) from the outset about why, what, how, and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk.
5. Consider safety and wellbeing: base your information sharing decisions on considerations of the safety and wellbeing of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely, and secure: ensure that the information you share 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 for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

IF IN DOUBT ASK!

Appendix B: School Privacy Notice- published on the website Privacy Notice for Pupils, Parents, and Staff

Huntley CE Primary School collects and uses personal information about pupils, parents, and staff in order to provide education and support, fulfil our legal obligations, and promote the welfare of our school community. We are committed to protecting your privacy and handling your information securely and in accordance with the law.

This notice explains what information we collect, how we use it, who we share it with, and your rights. For more information, please see our Data Protection Policy or contact the head teacher.

What information do we collect?

We collect personal information such as names, contact details, date of birth, medical information, attendance, assessment data, and safeguarding records.

How do we use your information?

We use your information to support teaching and learning, monitor progress, safeguard pupils, communicate with families, and meet our legal obligations.

Who do we share your information with?

We may share information with local authorities, health services, the Department for Education, and other agencies where required by law or to safeguard children.

Your rights:

You have the right to access your information, request corrections, object to processing, and request deletion in certain circumstances.

For further details, please contact Mrs Walding or Mrs Curtis

Appendix C: Information Sharing Flowchart

Information Sharing Decision-Making Flowchart

- 1. Is there a clear and legitimate purpose for sharing the information?**
 - If yes, proceed.
 - If no, do not share.

- 2. Does the information need to be shared?**
 - Consider if sharing is necessary to protect a child or comply with the law.

- 3. Have you sought consent?**
 - Seek consent where appropriate, unless it would place someone at risk.

- 4. If consent is not given, or not sought, is there a legal basis to share?**
 - If yes, share information as necessary.

- 5. Share information securely and only with those who need to know.**

- 6. Record your decision and the reasons for sharing or not sharing.**

Definition of terms used in this policy

Confidentiality: The obligation to protect personal and sensitive information from unauthorised disclosure, ensuring it is only shared with those who have a legitimate need to know.

Personal Data: Any information relating to an identified or identifiable individual, as defined by the Data Protection Act 2018 and UK GDPR. This includes names, addresses, contact details, and other identifying information.

Sensitive Information: Personal data that is subject to additional protection under data protection law, such as information about health, ethnicity, religion, sexual orientation, or involvement with social care or the criminal justice system.

Information Sharing: The process of disclosing personal or sensitive information to another individual or organisation, in accordance with legal and ethical guidelines.

Disclosure: The act of revealing confidential information, either intentionally (e.g., reporting a safeguarding concern) or unintentionally (e.g., accidental data breach).

Safeguarding: The process of protecting children from abuse, neglect, and harm, and promoting their welfare, as defined in KCSIE and the Children Act.

Consent: Permission given by an individual (or, in the case of children, by a parent/carer or the child themselves if of sufficient age and understanding) for information to be shared. In safeguarding contexts, consent is not always required if there is a risk of harm.