



Park Road Academy Primary School



Staff and Volunteer Confidentiality Policy 2024 – 2025



Statement of Intent

This policy guides staff, volunteers and visitors, including trustees on the policy and procedures surrounding confidentiality.

Staff members take a supportive and accepting attitude towards pupils as part of their general responsibility for pastoral care. It is our hope that both pupils and parents feel free to discuss worries about Park Road Academy Primary School and concerns that may affect the educational progress of a pupil, with members of the school team.

This policy will be abided by at all times by staff, volunteers, visitors, pupils and parents. In order to ensure the utmost level of safety for pupils, staff members at the school have a duty to act in accordance with this policy and not share information with external agencies, other schools or individuals.

The Staff and Volunteer Confidentiality Policy has the following benefits, it:

- Ensures that important information regarding the school is not shared.
- Guarantees that financial information stays confidential and secure.
- Helps to build trust amongst staff, volunteers and external agencies.
- Supports the school's safeguarding measures



1. Legal Framework

This policy has due regard to legislation including, but not limited to, the following:

- The Crime and Disorder Act 1998
- The Education Act 2002
- The Equality Act 2010
- The Freedom of Information Act 2000
 - The UK General Data Protection Regulation (UK GDPR)
 - Data Protection Act (DPA) 2018
- The Human Rights Act 1998
- The Education (Pupil Information) Regulations 2005 (as amended in 2016)

This policy is compliant under the following case law:

- The Common Law Duty of Confidentiality

This policy also has due regard to guidance documents including, but not limited to, the following:

- DfE (2015) 'Information sharing'
- DfE (2023) 'Keeping children safe in education 2023'
DfE (2018) 'Information sharing'
- DfE (2023) 'Working together to safeguard children'

This policy is intended to be used in conjunction with the following school policies:

- GDPR Data Protection Policy
- Record Management Policy
- Child Protection & Safeguarding Policy
- Anti-bullying Policy
- Freedom of Information Policy
- Whistleblowing Policy



- eSafety Policy (incl. Social Media)
- Allegations of Abuse Against Staff Policy

2. Definitions

For the purpose of this policy, '**confidentiality**' is an understanding that any information shared with someone in trust will only be passed on to a third party with the prior and explicit agreement of the person disclosing it.

Within this policy, a '**disclosure**' is the sharing of any private information; this term does not solely relate to child protection issues.

The term '**limited confidentiality**' refers to the disclosure of information with professional colleagues; however, the confider would not be identified except in pre-determined circumstances.

3. Roles and Responsibilities

All staff members, volunteers and individuals working in cooperation with the school will uphold their responsibility and duty of confidentiality, ensuring that information and personal details are not shared or discussed with others, except for the appropriate necessary bodies.

Visitors, volunteers and other professionals, such as healthcare professionals, will work within the same boundaries of confidentiality as all staff members.

Staff members and volunteers alike, have the responsibility of keeping information regarding the school, including its pupils and parents, etc., confidential. This information will under no circumstances be shared, unless it is in the best interest of the school or its pupils.

All staff members, volunteers and external agencies will treat any information regarding the management and finance of the school as confidential, and therefore this information will only be shared with necessary and appropriate external individuals.

Members of staff, volunteers, visitors, external parties and other agencies will always seek advice from a practitioner at the school if there is any doubt over sharing the information concerned, without disclosing any identifiable information where possible.

As a precautionary safeguarding measure, the school will ask all staff members, volunteers, visitors and external agencies who work closely with the school to sign the School Confidentiality Agreement via Operoo (see Appendix B).



The Headteacher is responsible for ensuring that a confidentiality agreement is signed by all individuals who may be privy to information which is not suitable to be shared.

4. Confidentiality and Child Protection (not all new information, but I have re-written this section)

The school will always prioritise the welfare of its pupils and this will remain the primary concern when investigating an allegation which has been made against a member of staff, and will always follow the procedures set out in the Allegations of Abuse Against Staff Policy.

A staff member who faces allegations relating to safeguarding concerns may find the investigation process extremely stressful. For this reason, the school will ensure that anyone who holds information relating to the investigation keeps said information confidential and that it will not ordinarily be shared with any other staff, pupils or parents who are not involved in the investigation.

The processes involved in maintaining confidentiality and carrying out an investigation will operate in line with The Education Act 2011, which made the publishing of any material illegal if it leads to the identification of a staff member in a school who has been subject to allegations by, or on behalf of, a pupil in the school.

The school will take steps to ensure that confidentiality is maintained against any unwanted publicity whilst an allegation is being investigated or considered; this will include ensuring that all staff who have access to files and data, or any other relevant form of information, sign a confidentiality agreement.

The school will ensure that the above restrictions on sharing information – including any speech, writing, or other communication which is exposed to any section of the public – are adhered to and will apply until:

- The accused person has been charged with a relevant offence.
- The Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

These restrictions will not be applied under the following circumstances:

- The individual who is being investigated waives their right to anonymity by going public on their own accord
- The individual being investigated provides written consent for another individual to publicly disclose the relevant confidential information
- A court lifts the reporting restrictions in response to a request to do so

Any individual, such as a parent or staff member, who discloses information to any section of the public, e.g. on a social networking site, will be in breach of the reporting restrictions if what they have disclosed could lead to the identification of the staff member by members of the public.



All external visitors will be made aware of this policy and act in accordance with it when dealing with information, particularly sensitive information, regarding the school, its pupils and parents.

The headteacher will be informed of all incidents regarding child protection concerns which are highlighted by a volunteer, parent or another external party to the school.

Staff members will immediately inform the DSL of any concerns regarding a pupil's safety or welfare, and where necessary the LA designated officer. Any concerns raised over a child's welfare and safety will be reported immediately to ensure that any intervention necessary to protect the child is accessed as early as possible.

Staff members will not be obliged to inform the police on most matters relating to illegal activity, such as illegal drugs or assaults. These will be assessed on a case-by-case basis with the support of the SLT.

5. Sharing Information

The school takes the stance that all information about individual pupils is private and should only be shared with other professionals who have a legitimate need to know.

Under no circumstances will personal information about pupils, staff members or the school be passed on indiscriminately.

Under no circumstances will information regarding the school's finances be shared with anyone, other than those with a legitimate need to know.

If members of staff, volunteers or cooperating external parties share unsuitable or misrepresented information, the school withholds the right to take the appropriate civil, legal or disciplinary action.

The safety and protection of pupils, as well as the school, is the paramount consideration in all confidentiality decisions.

All non-teaching staff and volunteers will report disclosures of a concerning personal nature to the Designated Safeguarding Lead as soon as possible and in an appropriate setting.

All external visitors will be made aware of the Staff and Volunteer Confidentiality Policy and act in accordance with it when dealing with information, particularly sensitive information, regarding the school, its pupils and parents.

All data will be processed and held in line with the school's GDPR Data Protection Policy. In the event of information and data being shared with external or inappropriate parties, the individual responsible will be liable for disciplinary or legal action in accordance with the GDPR Data Protection Policy.



6. Breaking Confidentiality

When confidentiality must be broken because a child may be at risk of harm, in accordance with the school's Safeguarding & Child Protection Policy, the school will ensure the following:

- Pupils are told when information has been passed on
- Pupils are kept informed about what will be done with information
- To alleviate their fears concerning the information becoming common knowledge, pupils are told exactly who their information has been passed on to

If confidential information is shared with the explicit consent of the individuals involved, and they are informed of the purpose of sharing the information in question, there will be no breach of confidentiality or of the Human Rights Act 1998.

In the event that explicit consent for sharing confidential information is not gained, an individual will satisfy themselves that there are reasonable grounds to override the duty of confidentiality in these circumstances before sharing the data.

The school recognises that overriding public interest is a justifiable reason to disclose information; however, permission from the Headteacher will be sought prior to disclosing any information regarding the school.

Staff should act in accordance with the school's Whistleblowing Policy.

Individuals who disclose information, after previously signing the school's confidentiality agreement, may face further action, including legal action.

Staff in breach of this policy may face disciplinary action, if it is deemed that confidential information was passed on to a third party without reasonable cause.

7. Responsible use of ICT and technology

Every member of staff will adhere to the school's ICT Acceptable Use Policy at all times.

All staff, with particular reference to ICT technicians and staff members with access to wider files and data, will understand their obligation to use ICT systems in a responsible way and respect others' privacy and confidentiality.



Staff will understand that their use of ICT systems, email and other digital communications will be monitored and the staff responsible for monitoring such activities will not share any confidential information unless this is for the purposes of keeping children safe or any other legal complication.

Staff will never disclose their password to anyone, nor will they attempt to use another individual's account details.

All staff will immediately report illegal, inappropriate, or harmful material seen on another individual's network to the headteacher.

Anyone found accessing, copying, removing or altering any other user's files without permission will face appropriate disciplinary measures.

Communication with pupils and parents will only take place through official school systems.

The headteacher and DPO will be informed immediately in the event of a data breach on any school device.

The use of any programmes or software that attempts to bypass filtering or security systems in place at the school is strictly prohibited.

As outlined in the school's Data Protection Policy, all staff members will understand that any staff or pupil data, which they have access to, will be kept private and confidential unless the sharing of information is deemed necessary as outlined above.

8. Accessing Information

In accordance with article 15 of the GDPR, personal information, such as educational records, can be shared via a subject access request (SAR).

- These requests must be made in writing to the Data Protection Officer and will be responded to within 15 school days if the request is regarding an educational record.
- If the data being requested is not in relation to an educational record, the response must be within one calendar month.
- Pupils, or the parent of a pupil, have the right to access the information that the school holds about the child in question.
- Some types of personal data are exempt from the right of a SAR and so cannot be obtained by making a SAR. Information may be exempt because of its nature or because of the effect its disclosure is likely to have.



- Information regarding another individual must not be disclosed in a SAR.
- Individual requests for non-personal information cannot be treated as a SAR but will be dealt with as a freedom of information (Fol) request.

In line with the Freedom of Information Act 2000, private data and public records can potentially be accessed through lodging a Fol request.

- These requests must be made in writing to the school, stating the name and address of the requester as well as a description of the information requested.
- Successful Fol requests will be responded to within 20 working days from receipt of the request, unless the request does not comply with the procedure set out in the school's Freedom of Information Policy.
- Park Road Academy holds the right to charge the requester a fee.
- Certain information will not be shared, such as that explained in Part 2 of the Freedom of Information Act 2000.

9. Maintaining confidentiality when staff leave

The school expects the departing staff member to respect and maintain any confidential information once they have left the school's employment, as per the privacy and confidentiality terms within their contract of employment.

The school will not share any information that we hold on the departing staff member, unless we have an obligation to do so or we have obtained consent – this will be detailed in a privacy notice, which will be available on the school's website.

Where necessary, for example in the case of highly sensitive information, a settlement agreement will be established to ensure confidentiality – the departing staff member and Headteacher will agree and sign this agreement.

All data that the school retains on the departing staff member will be stored in accordance with the Data Protection Policy and Records Management Policy.

Where consent was used to obtain information and the departing employee wishes to withdraw consent, they will express this to the DPO in writing.

Where the departing staff member had access to any password protected sensitive data, e.g. school bank accounts, the passwords will be changed upon their departure by their replacement.

10. Monitoring and Review



This policy is monitored for effectiveness by the Headteacher and Data Protection Officer and is reviewed every two years, or where necessary in light of changes to the law or statutory guidance – the next review date is **September 2025**.

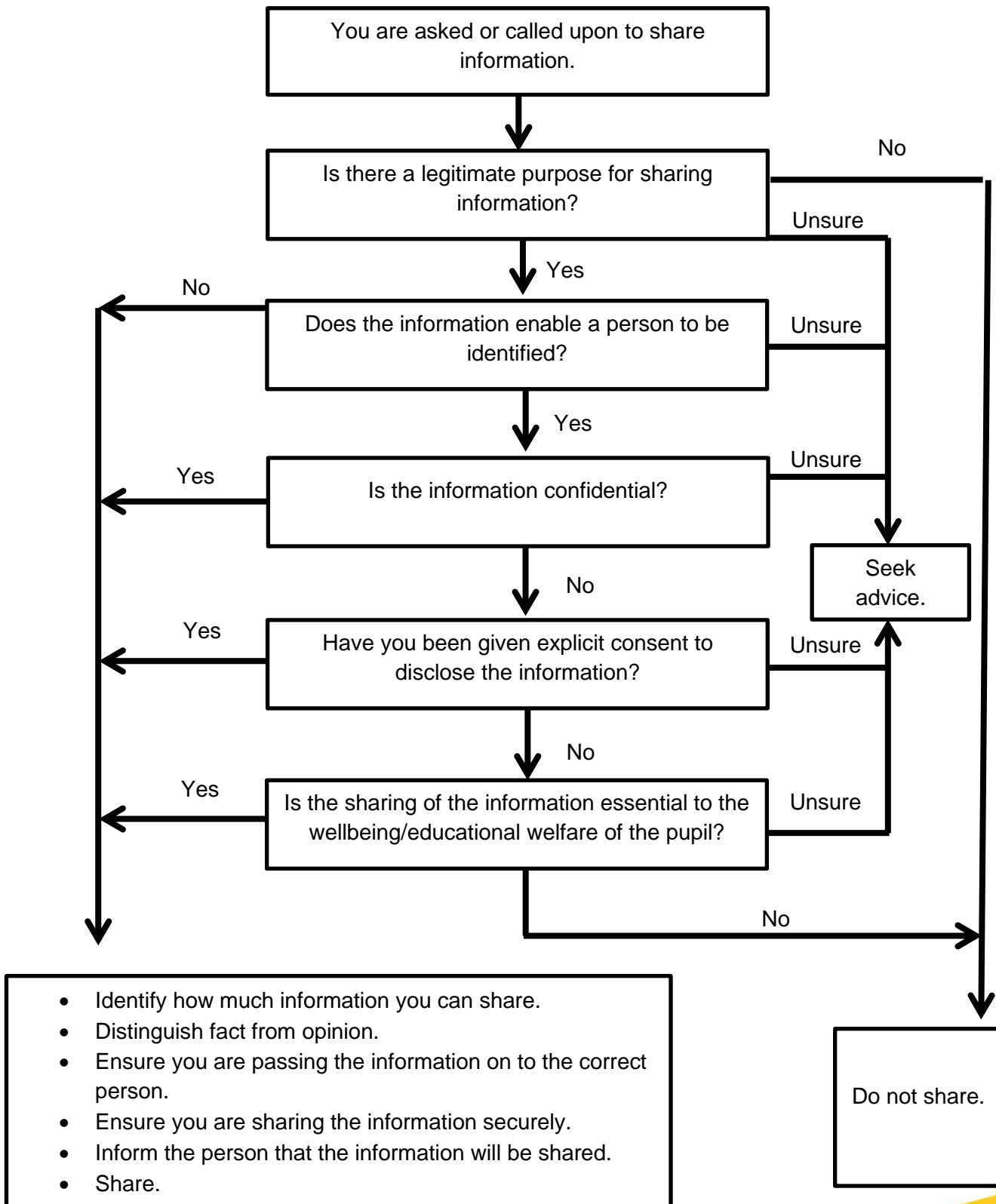
A record of information which has been shared will be continuously kept up-to-date.

- This record will state the premise of the information, whom it was shared with and the purpose for sharing it.
- The record will be kept in the school office and can be accessed by all appropriate staff members.

On an annual basis, the Headteacher (as an advanced Safeguarding Practitioner) will review the record to ensure that all reasonable measures to safeguard pupils and protect the reputation of the school are being taken.



Appendix A – Information Sharing Flowchart





Appendix B – School Confidentiality Agreement via Operoo

This confidentiality agreement is entered into by and between the Park Road Academy Primary School and _____ name of individual _____, _____ role within school _____, for the purpose of preventing the unauthorised disclosure of confidential information in line with your duties to protect personal information under the Data Protection Act 2018.

For the purpose of this agreement, “confidential information” will include all information or material that has or could have value, commercial or otherwise, in the business in which the disclosing party is engaged.

I declare that I will only share or disclose information regarding the school with other professionals who have a legitimate need to know about it. I will, therefore:

- Not disclose confidential information to any unauthorised person without the discloser’s consent.
- Act in good faith at all times in relation to the disclosure of confidential information.
- Not post confidential information regarding pupils, staff, parents or other stakeholders on social media, nor will I contribute to discussions on social media regarding the school or anyone associated with it.
- Ensure that anything I hear that questions the professionalism of a member staff or volunteer of the school is reported to the Headteacher immediately.
- Ensure that if I notice anything of concern regarding the protection or safeguarding of a child, I will report it immediately to the Headteacher.
- Assure that conversations of a sensitive nature regarding pupils, parents, staff, volunteers or other stakeholders take place in a private space.
- Comply with the school’s Records Management Policy when completing tasks pertaining to paperwork or online documents that include personal or sensitive information.
- Be fully aware that other staff, volunteers or stakeholders may have connections within the school and may overhear conversations of a sensitive nature.
- Uphold the good name and reputation of the school at all times; inside and outside of school.

I will hold and maintain the confidential information in strictest confidence for the sole and exclusive benefit of the school; therefore, I will not, without prior approval of the school, use for my own benefit, publish, copy, or otherwise disclose to others, or permit the use by others for their benefit or to the detriment of the school, any confidential information.



I have read and understood the school's Staff and Volunteer Confidentiality Policy and will act in accordance with this policy at all times.

Information which may be deemed as 'sensitive' will not be disclosed to people where it is not wholly necessary. This includes information in relation to the following:

- Pupils of the school
- The running or management of the school
- The school's finances
- Personal details of pupils or staff
- Information regarding progress and attainment which is not published on the school website

By signing this agreement, you are agreeing to your duty to hold confidential information in confidence – this will remain in effect until the information no longer qualifies as confidential, or until the school sends written notice releasing you from this agreement, whichever occurs first.

If you have any questions or concerns, please contact the Headteacher on parkroadtimp.admin@trafford.gov.uk or 0161 972 4820, or the Data Protection Officer on dpo@parkroadprimary.trafford.sch.uk

Reviewed February 2025 by K Hart

Ratified by All Governors February 2025

Review due September 2025



Staff Exit Procedure Checklist via Operoo

Use this checklist to ensure that all duties regarding the departure of a staff member have been completed prior to the end of their notice period.

Employee's name	
Job role	
Date resignation notice letter was received	
Last day	
Person responsible for overseeing their exit	

Action	Complete (Y/N)?	Date completed
Once the employee has handed in their notice, the headteacher acknowledges it in writing within one week.		
Begin the recruitment process, if appropriate.		
The headteacher informs the relevant staff, e.g. HR departments.		
The School Business Manager provides the departing staff member with a leavers letter, specifying essential information relating to the staff member's exit, e.g. their final day and any holiday entitlements.		



The headteacher provides a link to an exit questionnaire via Operoo, giving the departing staff member at least one week's notice to complete.		
If the departing staff member declines to complete the exit questionnaire, this will not be enforced.		
A handover period is established, if necessary.		
The School Business Manager and DPO establish what information the school needs to keep pertaining to the departing staff member, who is informed of this.		
The School Business Manager ensures the ICT technician terminates the departing staff member's accounts at the school and obtains any school-owned equipment.		
The School Business Manager ensures business continuity by: <ul style="list-style-type: none"> • Removing the departing staff member from the website and any contact lists. • Delegating the departing staff member's duties until a replacement is found. • Ensuring any repayments are made to either party, e.g. travel expenses. 		
The headteacher arranges for someone to fulfil any additional roles that the departing staff member has, e.g. fire safety officer or first aider.		
The School Business Manager establishes a system for incoming emails to the departing staff member's account, e.g. forwarded to another staff member automatically.		
HR systems are updated, e.g. payroll.		



Colleagues and the school community are informed of the staff member's departure, adhering to confidentiality issues.		
The headteacher makes arrangements to handle issues raised from the exit questionnaire.		
Where the departing staff member had access to password protected sensitive data, e.g. bank accounts, the School Business Manager changes the passwords upon their departure.		
Where necessary, an information settlement agreement is established.		