

Three Counties Academy Trust



Staff and Volunteer Confidentiality Policy

#HR32

Last amended 17th July 2026 (v1.0)

Policy lifespan: 3 years. Subject to annual compliance check. Next full review 16th July 2029.

Version history

Date	Version	Details	Actioned by	PDF to Websites	Word to Governor Hub
17.07.26	1.0	Formatted to house style and checked against model for updates	MF	✓	✓

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Policy Abbreviations and Acronyms

CEO	Chief Executive Officer
CFO	Chief Financial Officer
DfE	Department for Education
DPO	Data Protection Officer
DSL	Designated Safeguarding Lead
ICT	Information Communication Technology
LA	Local Authority
SLT	Senior Leadership Team
TCAT	Three Counties Academy Trust
UK GDPR	UK General Data Protection

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

Statement of intent

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

This policy will be adhered to at all times by staff, volunteers, visitors, pupils, and parents. In order to ensure the utmost level of safety for pupils, Three Counties Academy Trust (TCAT) staff members 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:

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

Member, Trustee, Local Governor and Staff Summary

Purpose of the Policy

- Protect confidential information relating to TCAT, schools, pupils, staff, and families
- Support safeguarding arrangements and legal compliance
- Ensure staff, volunteers and visitors understand their confidentiality responsibilities

Key Responsibilities

- Keep information about pupils, parents, staff, and TCAT operations confidential
- Only share information where there is a legitimate professional need to do so
- Sign and comply with confidentiality and ICT agreements
- Follow safeguarding and data protection requirements at all times

Safeguarding and Child Protection

- Safeguarding concerns must always take priority over confidentiality
- Report concerns immediately to the Designated Safeguarding Lead
- Maintain confidentiality during investigations and safeguarding processes
- Only share information with those who need to know

Information Sharing

- Share information lawfully, fairly, and only when necessary
- Ensure personal data is accurate, secure, and protected
- Record decisions relating to data sharing where required
- Recognise that data protection legislation does not prevent information sharing to keep children safe

Use of ICT and Technology

- Use TCAT systems responsibly and professionally

- Keep passwords secure and never use another person's account
- Report inappropriate material, security concerns, or data breaches immediately
- Use official school systems for communication with pupils and parents

Records and Data Security

- Maintain secure management of records and documents
- Protect financial, personnel and pupil information
- Store and process information in line with TCAT policies and legal requirements

When Staff Leave

- Confidentiality obligations continue after employment ends
- Sensitive information must not be disclosed after leaving TCAT
- Any information retained will continue to be managed in accordance with data protection requirements

Key Assurance

- TCAT expects high standards of confidentiality from everyone working within or alongside its schools
- Clear procedures are in place to support safeguarding, information sharing, and data security
- Breaches of confidentiality may result in disciplinary, legal, or other appropriate action

Volunteer Summary

Why This Policy Matters

- Volunteers may see or hear information about pupils, families, staff and school operations that must remain confidential
- Maintaining confidentiality helps protect pupils, supports safeguarding arrangements and builds trust between the school, families and the wider community
- All volunteers are expected to follow this policy whilst working in or on behalf of TCAT or one of our schools

Your Responsibilities as a Volunteer

- Treat all information about pupils, parents, staff and the school as confidential
- Only share information with authorised staff who have a legitimate need to know
- Follow all confidentiality expectations and any agreements you are asked to sign
- Act professionally and responsibly when handling information in any format

Safeguarding Comes First

- The safety and welfare of children always takes priority over confidentiality concerns
- Any concern about a child's welfare must be reported immediately to a member of staff or the Designated Safeguarding Lead (DSL)
- Volunteers must never promise to keep safeguarding concerns secret
- Information should only be shared with those responsible for taking appropriate action to protect a child

Sharing Information

- Do not discuss pupils, families, staff or school matters with friends, relatives or members of the public
- Do not share information on social media or through personal messaging services
- Only information that is necessary and appropriate should ever be shared with authorised professionals
- If you are unsure whether information can be shared, seek advice from school leaders before doing so

Using Technology Safely

- Use TCAT and school technology and systems responsibly and only for authorised purposes
- Keep any passwords or login details secure
- Report any concerns about inappropriate material, security issues or potential data breaches immediately
- Communication with pupils should only take place through approved school systems and arrangements

If Confidentiality Must Be Broken

- Information may need to be shared where a child is at risk of harm or where there is a legal obligation to do so
- Decisions to share information will follow safeguarding and data protection requirements
- Volunteers should always pass concerns to appropriate staff rather than making decisions independently about sharing confidential information

Key Messages for Volunteers

- Protect confidential information at all times
- Report safeguarding concerns immediately
- Do not discuss pupils, staff or school matters outside school
- Ask for guidance if you are unsure about confidentiality requirements
- Remember that confidentiality responsibilities continue even after your volunteering role ends

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- [Crime and Disorder Act 1998](#)
- [Equality Act 2010](#)
- [The UK General Data Protection Regulation \(UK GDPR\)](#)
- [Data Protection Act 2018](#)
- [Education Act 2002](#)
- [Human Rights Act 1998](#)
- [The Education \(Pupil Information\) \(England\) \(Amendment\) Regulations 2019](#)
- [DfE 'Keeping children safe in education'](#)
- [DfE 'Information sharing'](#)
- [DfE 'Working Together to Safeguard Children'](#)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Records Management Policy (FI2)
- Freedom of Information Policy (FI10)
- Data Protection Policy (FI20)
- Disciplinary Policy and Procedure (HR3)
- Whistleblowing Policy (HR25)
- Informal Confidentiality agreement (HR32(A))
- Child Protection and Safeguarding Policy and Procedures (SG1)
- Allegations of Abuse Against Staff Policy (SG5)
- Anti-Bullying Policy (SG19)

- Online Safety Policy (SG43)

This policy is compliant under the following case law:

- [The Common Law Duty of Confidentiality](#)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The CEO will:

- Ensure school leaders understand why they must agree to the regulations set out in this policy and the documents outlined in the legal framework
- Ensure that Central Team staff members sign confidentiality agreements
- Remain informed of any confidentiality, safeguarding or data protection concerns within each TCAT school by regular updates from the Executive Headteacher or Headteacher
- Decide in collaboration with the Executive Headteacher or Headteacher on the appropriate disciplinary procedures that will be placed upon any staff member who is in breach of their confidentiality agreement or otherwise withholds, discloses, or shares confidential information without reason
- Ensure that this policy is kept up to date with all other documents, policies and statutory frameworks which operate in conjunction with this policy

Executive Headteachers, Headteachers and where delegated, Heads of School will:

- Ensure their staff understand why they must agree to the regulations set out in this policy and the documents outlined in the legal framework
- Ensure that their staff members sign confidentiality agreements
- Remain informed of any confidentiality, safeguarding or data protection concerns within their school and regularly update the CEO

- Advise the CEO on the appropriate disciplinary procedures that will be placed upon any staff member who is in breach of their confidentiality agreement or otherwise withholds, discloses, or shares confidential information without reason

The DPO will:

- Address all concerns relating to data protection
- Provide advice in the event of a data breach
- Understand all relevant legislation including the Data Protection Act 2018 and the UK GDPR
- Understand how to correctly withhold, store, move and share data
- Ensure that TCAT's data is protected at all times and react quickly to any vulnerabilities

DSL's will:

- Understand the importance of information sharing with other schools/trusts, safeguarding partners, practitioners and any other relevant agencies or organisations
- Understand relevant data protection legislation and regulations with particular reference to the Data Protection Act 2018 and the UK GDPR
- Keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of record-keeping

All staff members, volunteers and individuals working in cooperation with TCAT will:

- Uphold their responsibility and duty in relation to confidentiality
- Ensure that information and personal details are not shared or discussed with others, except for the appropriate necessary bodies
- Keep information regarding TCAT or an individual TCAT school, including its pupils and parents, confidential
- Understand and sign a confidentiality agreement and, where necessary, a responsible use of ICT agreement

3. Definitions

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

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.

4. Confidentiality and child protection

TCAT will always prioritise the welfare of our 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 TCAT’s 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, TCAT 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.

TCAT 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.

TCAT 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 TCAT or a TCAT school, its pupils, and parents.

The Executive Headteacher, Headteacher and/or Head of School will be informed of all incidents regarding child protection concerns which are highlighted by a volunteer, parent, or another external party to the school and in turn alert the CEO.

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 but the DSL or the Executive Headteacher, Headteacher or Head of School must be informed without delay. These will be assessed on a case-by-case basis with the support of the DSL, SLT and Executive Leaders.

5. Sharing information

TCAT will take 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, TCAT or an individual TCAT school be passed on indiscriminately.

Under no circumstances will information regarding the TCAT'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, TCAT holds the right to take the appropriate civil, legal, or disciplinary action.

All staff and volunteers will report safeguarding concerns to their DSL as soon as possible and in an appropriate setting in line with policy.

All data will be processed and held in line with TCAT's Data Protection Policy. In the event of information and data being shared with external or inappropriate parties, the situation will be dealt with in accordance with the Data Protection Policy.

DSL's will recognise and assure staff members with concerns about a safeguarding issue that the Data Protection Act 2018 and the UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare.

Staff members who manage or have access to TCAT's data will always uphold our obligation to process personal information fairly and lawfully and keep the information they hold safe and secure.

TCAT will be open and honest with all individuals about how and why data is shared unless it is unsafe to do so.

Only information that is necessary for the purpose it is being shared for will be shared.

All decisions and reasons for sharing data will be recorded by the DPO.

6. Breaking confidentiality

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

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

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

Staff will act in accordance with the TCAT's Whistleblowing Policy at all times.

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 TCAT's Safeguarding, ICT and Data related policies 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 or Head of School, or in the case of the Central Team to the CEO.

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 TCAT school systems.

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

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

As outlined in TCAT'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. Management and security of records

In line with TCAT's Records Management Policy, any staff member who is responsible for or has access to files, documents, or data within TCAT's ICT infrastructure, database or other, is contractually obliged to maintain the security and management of such records which relate to:

- Pupils
- School management
- Finances
- Personal details of pupils or staff
- Information regarding progress and attainment which is not published on the TCAT or school websites

9. Maintaining confidentiality when staff leave

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

We 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 individual TCAT 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 CEO will agree and sign this agreement.

All data that TCAT 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., bank accounts, the passwords will be changed upon their departure by the Chief Financial Officer (CFO).

Monitoring and review

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies, Executive Headteachers, Headteachers and Heads of School.

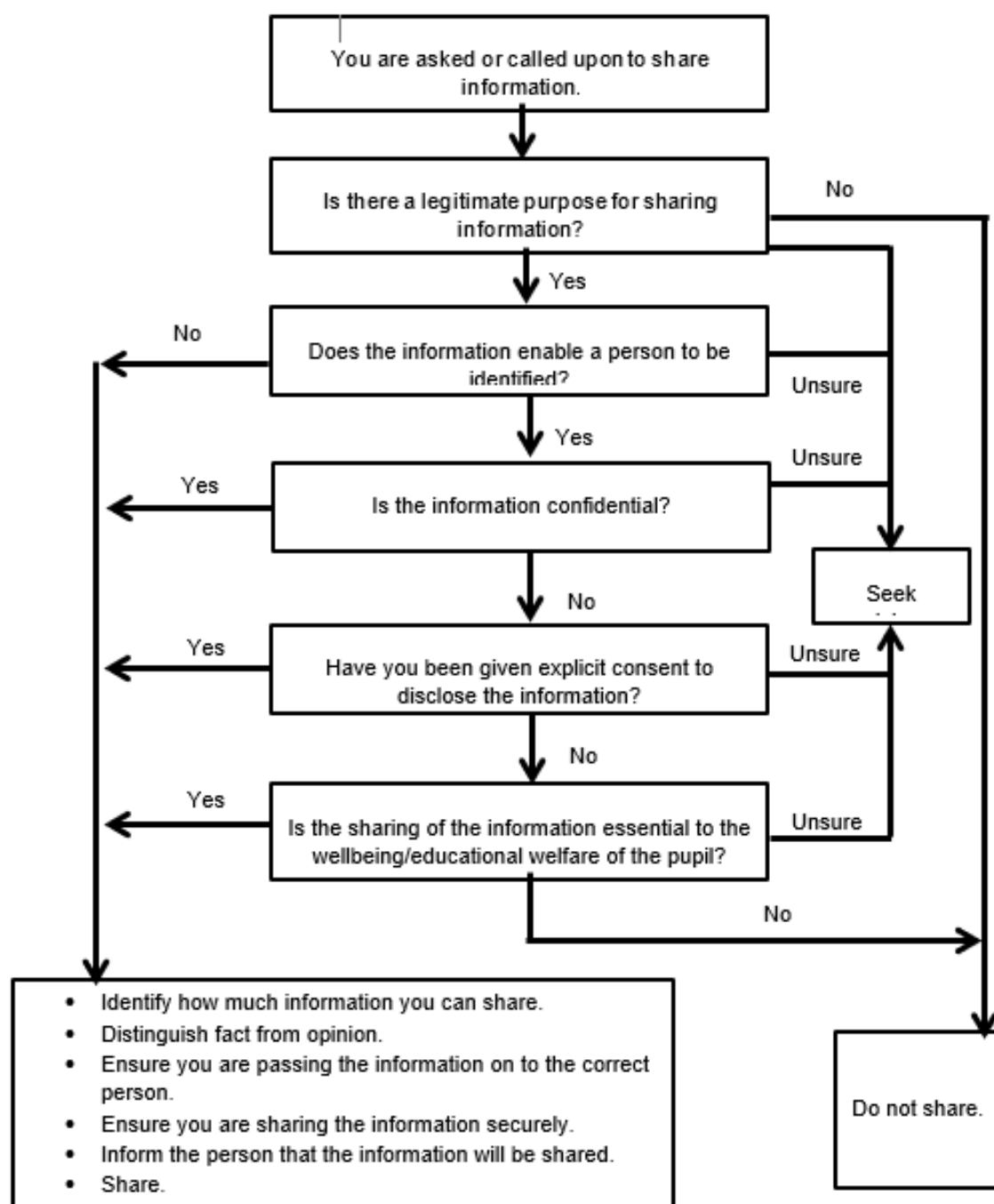
The next scheduled full review date for this policy is 16th July 2029.

Date approved by the Board Appointed Trustee: 17th July 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 17th July 2026.

Appendix A: Information Sharing Flowchart

Information Sharing Flowchart



Notes

- If there are child protection concerns, follow the relevant procedures without delay.
- Always seek advice if you are unsure whether to share information.

Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHCNA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSO	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher