



Data Protection and Confidentiality Policy

'From tiny acorns, mighty oak trees grow, watered and nurtured by God.'

Braywood CE First School
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Introduction

One of the aims of the Freedom of Information Act and the Data Protection Act is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public. This policy recognises the difference the General Data Protection Regulations (GDPR) has made to our policies and practices.

Rationale

Braywood CE School is committed to a policy of protecting the rights and privacy of individuals, including pupils, staff and others, in accordance with the DPA.

Our school needs to process certain information about its staff, pupils and other individuals with whom it has a relationship for various purposes such as, but not limited to:

- The recruitment and payment of staff
- The administration of programs of study
- The recording of a student's progress
- Agreeing awards
- Collecting fees
- Complying with legal obligations to funding bodies and government

To comply with various legal obligations, including the obligations imposed on it by the Data Protection Act, 1998, Braywood must ensure that all this information about individuals is collected and used fairly, stored safely and securely, and not disclosed to any third party unlawfully.

Compliance

This policy applies to all staff and pupils of Braywood CE First School. Any breach of this policy, or of the Act itself will be considered an offence and the school's disciplinary procedures will be invoked.

As a matter of best practice, other agencies and individuals working with our school, and who have access to personal information, will be expected to read and comply with this policy

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments to the DPA and other relevant legislation. (See Appendix 1 & 2)

This policy will be annually monitored and reviewed by our Governing Body.

Key Contacts

| Position | Name | Contact Details (email/phone) |
|--------------------------------|--|--|
| Headteacher | Susan Calvert | Braywood@rbwm.org.uk |
| Office Staff | Juliette Longman & Sam Moore | Fin.braywood@rbwm.org.uk |
| Finance Committee | Charlotte Scotchmere Michael Wadley | Braywood@rbwm.org.uk |
| DC and Data Protection Officer | Helen Wakeman | Helen.Wakeman@rbwm.org.uk |

Roles and Responsibilities

Legal Requirements

Human Rights Act 1998

Gives everyone the right to 'respect for his private and family life, his home and his correspondence', unless this is overridden: by the pupil interest, for reasons of child protection, for the protection of public safety, pupil order, health or morals or for the rights and freedoms of others.

Data Protection Act 1998

Applies to personal data of living, identified viable individuals, manual and electronic records. Schools need to be clear, when collecting personal data, what purposes it will be used for and schools should have policies to clarify this to staff, pupils and parents.

Freedom of Information Act 2000

Amends the Data Protection Act. It gives everyone the right to request any records a public body, including schools, holds about them. A school may withhold information it has if it is considered the information may damage the recipient, if disclosed. School data or record keeping policy should also cover the requirements of this act.

General Data Protection Guidance (GDPR) 2018

This new legislation consolidates on previous acts whilst seeking to tackle the challenges of growing personal electronic data. It suggests very clearly that:

- Privacy Impact Assessments (PIA) are now a mandatory requirement where privacy risks are high.
- Privacy Notice (formally Fair Processing Notices require adequate detail to ensure data compliance.
- Fees for Subject Access Requests (SARs) are abolished and stakeholders are entitled to request their personal data within 40 days. This data can then be destroyed on request across the whole school.

It is the school's responsibility to ensure that they comply with GDPR. Records of Processing Activities will need to be recorded and maintained.

Legal Responsibilities of Headteacher

The Headteacher is responsible for all day-to-day data protection matters, and she will be responsible for ensuring that all members of staff and relevant individuals abide by this policy, and for developing and encouraging good information handling within the school.

Compliance with the legislation is the personal responsibility of all members of the school who process personal information. Individuals who provide personal data to the school are responsible for ensuring that the information is accurate and up-to-date.

Legal Responsibilities of Office Staff

It is the Headteacher and her office staff who ensure that the information about our school, pupils and staff and accessible to our parents and general public in a safe and transparent manner. (*See Appendix 2*)

RBWM Council's Information Governance Team will be available to provide advice and assistance to the Head.

Legal Responsibility of the Data Protection Officer

It is the Data Protection Officer who will be responsible for ensuring that the regulations of the GDPR are maintained and that the school's policies and procedures are enforced. If a parents or staff member requests to see their personal data then it is the responsibility of the Data Protection Officer to ensure that this is achieved with the appropriate timescale.

Data Protection Principles

Our school gathers and uses personal information about staff, pupils, parents to enable it to provide education and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that the schools comply with their statutory obligations.

What is Personal Information?

Personal information or data is defined as data that relates to a living individual who can be identified from that data, or other information held.

Schools have a duty to be registered as Data Controllers with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website. Schools also have a duty to issue a Privacy Notice (see Appendix 1 for model) to all pupils/parents, which summarises the information held on pupils, why it is held and the other parties to whom it may be passed on.

Purpose

This policy and set of procedures are intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998 and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed and irrespective of whether it is held in paper files, on tape or disk, or otherwise electronically.

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times. The legislation places a responsibility on every member of staff to process any personal data in accordance with the eight principles.

1. Personal data shall be processed fairly and lawfully.
2. Personal data shall be obtained only for one or more specified and lawful purposes.
3. Personal data shall be adequate, relevant and not excessive.
4. Personal data should be accurate and where necessary, kept up-to-date.
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under the D.P. Act
7. Personal data shall be kept secure i.e. protected by an appropriate degree of security.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection.

Our school is committed to maintaining the above principles at all times.

Therefore we will:

- Register as Data Controllers with the Information Commissioner's Office (ICO) detailing the information held and its use.
- Inform individuals why the information is being collected when it is collected.
- Inform individuals when their information is shared and why and with whom it was shared.
- Check the quality and the accuracy of the information it holds.
- Ensure that information is not retained for longer than is necessary.
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely.
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded.
- Share information with others only when it is legally appropriate to do so.
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests.
- Issue a Privacy Notice which summarises the information held by us
- Ensure our staff are aware of and understand our policies and procedures.

Model Data Protection Practices

Consent as a basis for processing

All stakeholders should give their consent before processing their data to ensure an open and transparent process. Consent is especially important when schools are processing any sensitive data, as defined by the legislation.

We will ensure that any forms used to gather data on an individual will contain a statement (Privacy Notice) explaining the use of that data, how the data may be disclosed, and also indicate whether or not the individual needs to consent to the processing.

When publishing information on the Internet - because transfer of data can include placing data on a website that can be accessed from outside the LEA - we will always seek the consent of individuals before placing any personal data, including photographs on our website.

Parents offer consent for any photograph of their child taken within the school day. Staff members and/or parents for the purpose of recording an event agree it at the beginning of the year that photographs may be taken. Parents who do not agree to this policy are respected and their child is not placed in the photograph or video wherever possible.

Records of Processing Activities

To ensure that we comply with the General Data Protection Regulations we will ensure that we have a record of our data protection activities for all necessary practices. These records (RoPA) will be regularly maintained and will include:

- Name and contact details of the Data Controller,
- Purposes of the processing,
- Categories of data subjects and the categories of personal data,
- Categories of the recipient of whom data may be disclosed,
- Transfer of data to third parties (countries) and the related safeguards on place,
- Retention schedule,
- Security measures.

There will be Information Asset Registers (IAR) created and regularly maintained to ensure compliance with GDPR.

Disclosure of Data

Only disclosures, which have been notified under the school's DP notification must be made and therefore staff and pupils should exercise caution when asked to disclose personal data, held on another individual or third party. We undertake not to disclose personal data to unauthorised third parties, including family members, friends, government bodies, and in some circumstances, the police.

Legitimate disclosures may occur in the following instances:

- The individual has given their consent to the disclosure
- The school is legally obliged to disclose the information

There are other instances when the legislation permits disclosure without the consent of the individual detailed by RBWM.

Publication of School Information

Braywood publishes various items that will include some personal data, e.g.

- Internal telephone directory, Parent's contact details
- Event information
- Staff information, Lists of pupils

It may be that in some circumstances an individual wishes their data processed for such reasons to be kept confidential, or restricted to internal school access only. All consent is obtained wherever possible. Staff records appertaining to individual staff will remain of a confidential nature between the Head and the member of staff.

Email and messages

It is the policy to ensure that senders and recipients of email are made aware that under the Data Protection Act, and Freedom of Information legislation, the contents of email may have to be disclosed in response to a request for information. One means by which this will be communicated will be by a disclaimer on the school's email. All staff in RBWM shares our email provider 'First class'. It is encrypted and safe to use. It is constantly monitored by the RBWM.

Procedures

As a school we feel that it is important to put procedures in place to ensure that the whole school understand the importance of safeguarding people's confidential data. To ensure that we keep our data as safe as possible we have a range of protective measures that include:

- We have a social media policy that is adhered to by staff members, governors, PTA, pupils and parents. All staff adopts a responsible approach to what they do and do not post online. (See our Social Media Policy below))
- We have an Internet Policy that is also strictly adhered to with regards pupils' data.
- Teachers adhere to the school procedures when taking the children off-site. No personal data is carried on these trips except the children's first names.
- All electronic sites used are password protected and these passwords are not saved on the computer. All sites that we use to store our sensitive data are reputable companies with robust procedures that adhere to GDPR.
- Transfer of sensitive data i.e. office procedures, is not permitted outside school whether using a laptop or memory stick. The Headteacher uses a laptop to work at home that is password protected but sensitive data is kept to a minimum.
- Teachers have access to a laptop and an iPad all of which are password protected. These teaching tools do not contain sensitive data but may contain children's first names.
- We only use First-Class to transfer electronic messages. This site is encrypted.

Freedom of Information

Categories of Information

The table below guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into four broad topic areas:

- *School Prospectus*
- *Governors' Documents*
- *Pupils & Curriculum*
- *School Policies and other information related to the school*

Below is a collection of information currently published. There will be other documentation above and beyond this list. For more information see Appendix 2 at the end of this policy.

Information Currently Published

School Prospectus – this section sets out information published in the school prospectus.

| Class | Description |
|-----------------------------------|---|
| School Prospectus | <p>The statutory contents of the school prospectus are as follows, (other items may be included in the prospectus at the school's discretion):</p> <ul style="list-style-type: none"> · The name, address and telephone number of the school, and the type of school · The names of the head teacher and chair of governors · Information on the school policy on admissions · A statement of the school's ethos and values · Information about the school's policy on providing for pupils with SEN · Number of pupils on roll and rates of pupils' authorised and unauthorised absences · National Curriculum assessment results for appropriate Key Stages summary figures. |
| Instrument of Government | <ul style="list-style-type: none"> · The name of the school · The category of the school · The name of the governing body · The manner in which the governing body is constituted · The term of office of each category of governor if less than 4 years · The name of any body entitled to appoint any category of governor · Details of any trust · A description of the religious character and ethos · The date the instrument takes effect |
| Minutes of Governing Body. | Agreed minutes of meetings of the Governing Body and its committees <i>[current and last full academic school year]</i> |

Pupils & Curriculum Policies - This section gives access to information about policies that relate to pupils and the school curriculum. Here is an example.

| | |
|--------------------------------|--|
| Home - school agreement | Statement of the school's aims and values, the school's responsibilities, the parental responsibilities and the school's expectations of its pupils for example homework arrangements |
| Curriculum Policy | Statement on following the policy for the secular curriculum subjects and religious education and schemes of work and syllabuses currently used by the school |
| Sex Education Policy | Statement of policy with regard to sex and relationship education |
| Special Education Needs Policy | Information about the school's policy on providing for pupils with special educational needs |
| Accessibility Plans | Plan for increasing participation of disabled pupils in the school's curriculum, improving the accessibility of the physical environment and improving delivery of information to disabled pupils. |
| Race Equality Policy | Statement of policy for promoting race equality |
| Collective Worship | Statement of arrangements for the required daily act of collective worship |

| | |
|-------------------------|--|
| Child Protection Policy | Statement of policy for safeguarding and promoting welfare of pupils at the school. |
| Pupil Discipline | Statement of general principles on behaviour and discipline and of measures taken by the head teacher to prevent bullying. |

School Policies and other information related to the school - This section gives access to information about policies that relate to the school in general.

| | |
|---|--|
| Published reports of Ofsted referring expressly to the school | Published report of the last inspection of the school and the summary of the report and where appropriate inspection reports of religious education in those schools designated as having a religious character |
| Post-Ofsted inspection action plan | A plan setting out the actions required following the last Ofsted inspection and where appropriate an action plan following inspection of religious education where the school is designated as having a religious character |
| Published reports referring to SIAS inspection and relevant action plan | Inspection of the school in terms of it's effectiveness in terms of its religious foundation. A plan detailing how the school intends to address any areas identified for improvement. |
| Charging and Remissions Policies | A statement of the school's policy with respect to charges and remissions for any optional extra or board and lodging for which charges are permitted, for example school publications, music tuition, trips |
| School session times and term dates | Details of school session and dates of school terms and holidays |
| Health and Safety Policy and risk assessment | Statement of general policy with respect to health and safety at work of employees (and others) and the organisation and arrangements for carrying out the policy |
| Complaints procedure | Statement of procedures for dealing with complaints |
| Performance Management of Staff | Statement of procedures adopted by the governing body relating to the performance management of staff and the annual report of the head teacher on the effectiveness of appraisal procedures |
| Staff Conduct, Discipline and Grievance | Statement of procedure for regulating conduct and discipline of school staff and procedures by which staff may seek redress for grievance |
| Curriculum circulars and statutory instruments | Any statutory instruments, departmental circulars and administrative memoranda sent by the Department of Education and Skills to the head teacher or governing body relating to the curriculum |
| Annex A - Other documents | Annex A provides a list of other documents that are held by the school and are available on request |

Subject Access Rights (SARs)

Pupils, parents and carers have two distinct rights of access to information held by the school about pupils as set out below. The right of access of data is covered by the first of these acts.

- Under the Data Protection Act 1998 any individual has the right to make a request to access the personal information held about them.
- The right of those entitled to have access to curricular and educational records as defined within the Education Pupil Information (England) Regulations 2005.

Any individual wishing to exercise this right should apply in writing to the Headteacher. The school reserves the right to charge a fee for data subject access requests.

Rights of access to information

Procedures for responding to Subject Access Requests for access to a person's information made under the Data Protection Act 1998

Processing a Subject Access Request

1. Requests for information must be made in writing; which includes email, and be addressed to the Headteacher if it relates to school held information or to the Chief Executive if it relates to information held at Trust level. If the initial request does not clearly identify the information required, then further enquiries will be made.
2. The identity of the requestor must be established before the disclosure of any information and when requesting data on a pupil, checks will also be carried out regarding proof of relationship to the pupil. Evidence of identity will be established by requesting production of a copy of:
 - Passport
 - Driving License
 - Utility Bills with the current address
 - Birth/Marriage certificate
 - P45/P60
 - Credit Card or mortgage statement, *this list is not exhaustive*.
3. Any individual has the right of access to information held about them. However with pupils, this is dependent upon their capacity to understand (normally age 12 or above) and the nature of the request. The Headteacher should discuss the request with the pupil and take their views into account when making a decision. A pupil with competency to understand can refuse to consent to the request for their records. Where the pupil is not deemed to be competent, an individual with parental responsibility or carer shall make the decision on behalf of the pupil.
4. The school may make a charge for the provision of information, dependent upon the following:
 - Should the information requested contain the educational record then the amount charged will be dependent upon the number of pages provided. An educational record relates to record relating to academic achievement only. This type of record is available to all parents until the pupil becomes an adult with or without the consent of the pupil where this might apply. The school is required to respond within 15 days (i.e. 15 consecutive days that the school is open to receive pupils for the purpose of teaching). Should the information requested be personal information that is not an educational record, schools can charge up to £10 to provide it.
 - If the information requested is only the educational record, viewing will be free, but a charge (not exceeding the cost of copying the information) can be made, if a copy is requested.

5. The response time for subject access requests, once officially received, is 15 days where educational records are sought, and otherwise 40 days from receipt (**not working days but calendar days, irrespective of holiday periods**). However, the 40 days will not commence until after receipt of fees or clarification of information sought.
6. The Data Protection Act 1998 allows exemptions as to the provision of some information; therefore all information will be reviewed prior to disclosure.
7. Third party information is that which another person has provided. Before disclosing third party information consent will normally be obtained from them. *(There is still a need to adhere to the 40 day statutory timescale.)*
8. Any information which may cause serious harm to the physical or mental health or emotional condition of the pupil or another will not be disclosed, nor should information that would reveal that the pupil is at risk of abuse, or information relating to court proceedings.
9. If there are concerns over the disclosure of information then additional advice will be sought.
10. Where redaction (information blacked out/removed) has taken place then a full copy of the information provided will be retained in order to establish, if a complaint is made, what was redacted and why.
11. Information disclosed should be clear, thus any codes or technical terms will be clarified and explained. If information contained within the disclosure is difficult to read or illegible, it will be retyped.
12. Information can be provided at our school with a member of staff on hand to help and explain matters if requested, or provided at face-to-face handover. The views of the applicant will be taken into account when considering the method of delivery. If postal systems have to be used then registered/recorded mail will be used.

Complaints

Complaints will be dealt with in accordance with the school's complaints procedure, a copy of which can be obtained from the school office.

Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator) www.ico.gov.uk or telephone 01625 5457453.

Review

This policy and set of procedures will be reviewed as it is deemed appropriate, but no less frequently than every two years. The review will be undertaken by the Headteacher, or nominated representative.

Contacts

If you have any enquires in relation to this policy and procedures, please contact the, Headteacher who will also act as the contact point for any subject access requests.

Further advice and information is available from the Information Commissioner's Office, www.ico.gov.uk or telephone 01625 5457453.

Appendix 1 Data Protection Act – Privacy Notice

Schools, Local Authorities and the Department for Education (the Government department which deals with education) all hold information on pupils in order to run the education system, and in doing so have to follow the Data Protection Act 1998. This means, amongst other things that the data held about pupils must only be used for specific purposes allowed by law. We are therefore writing to tell you about the types of data held, why that data is held, and to whom it may be passed on.

Information to support teaching and learning

The school holds information on pupils in order to support their teaching and learning, to monitor and report on their progress, to provide appropriate pastoral care, and to assess how well the school as whole is doing. This information includes contact details, National Curriculum assessment results, attendance information, characteristics such as ethnic group, special educational needs and any relevant medical information.

Information and images in literature or on the school website

In addition, the school will occasionally include information or images of your son/daughter in our literature or on the Braywood website. Please let the school know if this presents a problem to you and we will take steps to ensure this information is not included. Parents need to be aware that at times the school may be legally bound to provide information to other bodies such as the police for example, which the school will try to do with the knowledge of the relevant parent(s).

Transfer of data and use by other organisations

From time to time we are required to pass on some of data to the Local Authority (LA), to another school to which the pupil is transferring, to the Department for Education (DfE) and to Standards and Testing Agency that is responsible for the National Curriculum and associated assessment arrangements.

The **Local Authority** uses information about pupils to carry out specific functions for which it is responsible, such as the assessment of any special educational needs the pupil may have. It also uses the information to derive statistics to inform decisions on (for example) the funding of schools, and to assess the performance of schools and set targets for them. The statistics are used in such a way that individual pupils cannot be identified from them.

The Government may require the school to share information with other agencies such as Health, Local Authorities and other relevant public bodies. The school will inform parents when this type of processing occurs and seek consent where this is necessary.

The **Standards and Testing Agency** uses information about pupils to administer the National Curriculum tests and assessments for Key Stages 1 to 3. The results of these are passed on to DfE in order for it to compile statistics on trends and patterns in levels of achievement. The Standards and Testing Agency uses the information to evaluate the effectiveness of the National Curriculum and the associated assessment arrangements, and to ensure that these are continually improved.

The **Department for Education** uses information about pupils for statistical purposes, to evaluate and develop education policy and to monitor the performance of the education service as a whole. The statistics (including those based on information provided by the Standards and Testing Agency) are used in such a way that individual pupils cannot be identified from them. The DfE will feed back to LAs and schools information about their pupils where they are lacking this information because it was not passed on by a former school. On occasion information may be shared with other Government departments or agencies strictly for statistical or research purposes only.

Pupils' rights

Pupils, as data subjects, have certain rights under the Data Protection Act, including a general right of access to personal data held on them, with parents exercising this right on their behalf if they are too young to do so themselves. If you wish to access the personal data held about your pupil, please contact the school directly in writing.

Appendix 2 Fair Processing Policy

This is Braywood CE First School Publication Scheme on information available under the Freedom of Information Act 2000. The Governing Body is responsible for maintenance of this scheme.

Introduction

One of the aims of the Freedom of Information Act 2000 is that public authorities, including all maintained schools, should be clear and proactive about the information they will make public. To do this we produce a publication scheme setting out:

- The classes of information which we publish or intend to publish;
- The manner in which the information will be published; and
- Whether the information is available free of charge or on payment.

Braywood CE First School processes personal data about its pupils and is a 'data controller' in respect of this for the purposes of the Data Protection Act 1998.

We process data to:

- Support its pupils' teaching and learning
- Monitor and report in their progress
- Provide appropriate pastoral care and
- Assess how well the school as a whole is doing

This data includes contact details, national curriculum assessment results, attendance information, characteristics such as ethnic group, special educational needs and any relevant medical information.

The scheme covers information already published and information that is to be published in the future. All information in our publication scheme is available in paper form. Some information that we hold may not be made public, for example personal information. This publication scheme conforms to the model scheme for schools approved by the Information Commissioner.

Aims and Objectives

The school aims to:

- Enable every child to fulfil their learning potential, with education that meets the needs of each child,
- Help every child develop the skills, knowledge and personal qualities needed for life and work,

This data may only be used or passed on for specific purposes allowed by law. From time to time the school is required to pass on some of this data to local authorities, the Department for Children, Schools and Families (DCSF), and to agencies that are prescribed by law, such as the Qualifications and Curriculum Authority (QCA), Ofsted, the Learning and Skills Council (LSC), the Department of Health (DH), Primary Care Trusts (PCT), ContactPoint (mentioned above). All these are data controllers in respect of the data they receive, and are subject to the same legal constraints in how they deal with the data.

Categories of information published

The publication scheme guides you to information which we currently publish (or have recently published) or which we will publish in the future. This is split into categories of information known as 'classes'. These are contained in section 6 of this scheme.

The classes of information that we undertake to make available are organised into four broad topic areas:
The information is published in our Data Protection Policy:

1. School Prospectus - information published in the school prospectus.
2. Governors' Documents - information published in the Governors' Annual Report and in other governing body documents.
3. Pupils & Curriculum - information about policies that relate to pupils and the school curriculum.
4. School Policies and other information related to the school - information about policies that relate to the school in general.

How to request information

The Governing Body of a maintained school in England is also required by law to supply basic information to stakeholders. This only includes the name and address of the child, contact details for their parents or carers (with parental responsibility) and the contact details of the school.

Pupils, as data subjects, have certain rights under the Data Protection Act, including a general right to be given access to personal data held about them by any data controller. The presumption is that by the age of 12 a child has sufficient maturity to understand their rights and to make an access request themselves if they wish. A parent would normally be expected to make a request on a child's behalf if the child is younger.

If you wish to access your personal data, or that of your child, then please contact the relevant organisation in writing. Details of these organisations can be found on the following website www.rbwm.gov.uk or for those pupils/parents where this is not practical a hard copy can be obtained from Braywood CE First school

Your attention is drawn to (Layer 2) of this Fair Processing Notice, which gives supplementary information about the processing of pupil data by the organisations mentioned above, and gives greater details of how the pupil data is processed and the rights of parents and pupils. These are available on www.rbwm.gov.uk or can be obtained from Braywood CE First School.

If you require a paper version of any of the documents within the scheme, please contact the school by telephone, email, fax or letter. Contact details are set out below.

email: **braywood@rbwm.org**
 Tel: 01628 623660
 Contact address: Oakley Green Road, Windsor, Berks SL4 4QF

If the information you're looking for isn't available you can still contact the school to ask if we have it.

Paying for information

Single copies of information covered by this publication are provided free. If your request means that we have to do a lot of photocopying or printing, or pay a large postage charge, or is for a priced item such as some printed publications or videos we will let you know the cost before fulfilling your request. Where there is a charge this will be indicated by a £ sign in the description box.

Feedback and Complaints

We welcome any comments or suggestions you may have about the scheme. If you want to make any comments about this publication scheme or if you require further assistance or wish to make a complaint then initially this should be addressed to Mrs Helen Wakeman

If you are not satisfied with the assistance that you get or if we have not been able to resolve your complaint and you feel that a formal complaint needs to be made then this should be addressed to the Information Commissioner's Office. This is the organisation that ensures compliance with the Freedom of Information Act 2000 and that deals with formal complaints.

They can be contacted at: email: **publications@ic-foi.demon.co.uk**
 Website : **www.informationcommissioner.gov.uk**

Appendix 3- Social Media Network Policy

Legal Framework

The principles adopted when using the Internet are designed to ensure that all stakeholders use the media responsibly so that the integrity of pupils, other staff, governors and parents and the reputation of the school are safeguarded.

All individuals working on behalf of the school are bound by a legal duty of confidentiality and other laws to protect the confidential information and the data they have access to during the course of their work. Disclosure of confidential information on social media is likely to be a breach of a number of laws and professional codes of conduct, including:

- The Human Rights Act 1998
- Common law duty of confidentiality,
- The Data Protection Act 2018.

Stakeholders should also be aware that other laws relating to libel, defamation, harassment and copyright may apply to information posted on social media, including:

- Libel Act 1843
- Defamation Acts 1952, 1996 and 2013
- Protection from Harassment Act 1997
- Criminal Justice and Public Order Act 1994
- Malicious Communications Act 1988
- Communications Act 2003, and
- Copyright, Designs and Patents Act 1988.

Whether we use social media or face-to-face interactions the same expectations regarding everyone's safety, basic courtesy and the lawful application of data protection guidelines outlined in this policy are our first priority.

Social Media at Braywood

We have four main forms of social media communication

1. PTA Facebook
2. Website and associated intranet through eschools.
3. Twitter
4. Year group Whatsapp platforms

The PTA Face book page is only available to our Parents, PTA and Office staff. Anyone currently registered with Facebook can see the group name and the names of the current members. However, to see any comments/posts/uploads or any content whatsoever, they must be approved as members of the group itself as it is a Closed Group.

The Website and eschools intranet is another closed sites which enables office staff to send letters and messages, teachers to send messages, parents to pay for trips etc. and pupils to communicated safely between themselves.

Twitter (and indeed the website) is a platform we use to communicate with a variety of followers inside and outside the school. These sites adhere to our data protection guidelines especially regarding personal information and photographs.

The Year group Whatsapp are for general communication purposes between parents such as school events, social gathering etc.

Objective of our Social Media platforms

- To advertise our school and to celebrate our achievements
- To provide information for current parents regarding our curriculum, ethos and standards.
- To provide a personal, safe learning platform for pupils and parents
- A mechanism to pay for trips etc
- A whole school attendance communication tool
- A way to raise awareness to parents/carers/ local community of school or PTA activities;
- A form of office communication for letters; messages or direct text messaging.
- A communication tool for parents to get to know each other and provide mutual support.

Responsibilities

Each social media platform has different responsible owners e.g. the school manages the Website, Twitter and our eschools platform; The PTA manage Face book and there is an appointed administrator for the Whatsapp pages.

Our school is responsible for the actions which occur within the realms of the school day such as any adults who harass any member of the school community online or who engage in cyberbullying or discrimination on the grounds of race, sex, disability, etc. or who defame a third party while at work.

All adults

- must not engage in activities involving social media that might bring the schools into disrepute.
- must be conscious at all times of the need to keep your personal and professional lives separate. You should not put yourself in a position where there is a conflict between your work for the school and your personal interests e.g. mindful of the images posted on Facebook.
- must not represent your personal views as those of the schools on any social medium.
- must not discuss personal information about pupils, staff, school or other professionals you interact with as part of your job on social media. Information should not be shared for your personal gain.
- must not use social media and the Internet in any way to attack, insult, abuse or defame pupils, their family members, colleagues, other professionals, other organisations, or the schools. Profanity is always unacceptable.
- must not use social media to stay in contact with a pupil unless the pupil is a family member or have contact with a pupils' family member if that contact is likely to constitute a conflict of interest.
- must be accurate, fair and transparent when creating or altering online sources of information on behalf of the school.
- must ensure that photographs, videos or any other types of image of pupils and their families or images depicting staff members wearing school uniforms or clothing with school logos or images identifying sensitive school buildings must not be published on any personal webspace. Photographs will not be named.

Comments on public and professional forums (such as Whatsapp and eschools which are negative will be dealt with constructively, the parent or member of staff will be reminded of our code of conduct and if comments are malicious, offensive or abusive they will be removed. If an individual continues to ignore school guidelines they will be removed from the site until further notice.

Any breach of this policy may lead to disciplinary action being taken against the staff member/s involved in line with the School Disciplinary Policy and Procedure. A breach of this policy leading to breaches of confidentiality, or defamation or damage to the reputation of the schools or any illegal acts or acts that render the schools liable to third parties may result in disciplinary action or dismissal.

Policies are readily available to all stakeholders on the website and can be request on the site itself.