CONFIDENTIALITY POLICY

Date of Policy	September 2026
Approved by Principal	September 2026
Next Review Date	August 2027
Lead for Review	DSLs, Head Teacher, Deputy Head Pastoral

PURPOSE

At CATS Cambridge we believe that the safety, wellbeing, and protection of our students are the paramount considerations in all decisions made about confidentiality. We also acknowledge that the appropriate and legitimate sharing of information between School staff is an essential element in ensuring our students' wellbeing and safety.

It is an essential part of our ethos that trusting relationships are established between students and staff, and between staff and parents, that enable the best and most appropriate support to be given to our students. Trusting relationships can only be established if staff, students, and parents are all clear about the provisions and purpose of this Confidentiality Policy, so that they have clear understanding of the boundaries that exist on the sharing of personal information.

It is particularly important that students, staff, and parents understand the boundaries of confidentiality in order that students feel safe and comfortable in discussing personal issues and concerns, including drugs and alcohol, health, sex, relationships and other personal matters with those who are caring for them at School.

All staff at the School receive training in child protection as part of their induction and are expected to follow the School's Safeguarding and Child Protection policy and procedures.

Everyone in the School community needs to know that no-one can offer absolute confidentiality

OVERVIEW FOR PARENTS

The School believes that it is essential to work in partnership with parents. To that end the School endeavours to keep parents abreast of their child's progress, including any concerns about their academic progress or behaviour.

There will be occasions when information will not be discussed with parents to safeguard the welfare and wellbeing of the student.

Where a student does discuss a difficult personal matter with staff, they will be encouraged to also discuss the matter with their parents.

Students who are 18 years old or older, have the right not to have personal information about their behaviour discussed with their parents. However, when their behaviour jeopardises their place at the School in any way, the consequences applied by the School may be shared with parent/feepayer.

THE LEGAL POSITION FOR STAFF

Confidentiality is an important principle that enables people to feel safe in sharing their concerns and to ask for help. However, the right to confidentiality is not absolute. Sharing relevant information with the right people at the right time is vital to good safeguarding practice.

Safeguarding is not limited to children**.** The Care Act 2014 places similar responsibilities on professionals to safeguard adults who may be at risk of abuse or neglect. Information may be shared without consent if there is a legitimate concern for the safety or wellbeing of an adult at risk, or where a serious crime may be prevented. As with children, any sharing must be lawful, proportionate, and in line with the UK GDPR, the Data Protection Act 2018, and relevant safeguarding legislation.

A student's safety must not be compromised through the inappropriate sharing of information. You must have a clear and legitimate purpose for information sharing.

All staff are expected to be conversant with the School's Safeguarding and Child Protection policy. In the context of this policy, and for clarity of expectation, all staff should note that it is NOT acceptable for School staff to do the following:

- Discuss issues of student confidentiality with colleagues who have no legitimate concern or interest. If in any doubt you need to contact the DSL to discuss.
- Discuss issues of student confidentiality with other students who have no legitimate concern or interest.
- Discuss issues of student confidentiality in inappropriate social settings and circumstances.

Where a student's circumstances may be impacting their progress and you wish to share this information to help them, consider what information you need to share. In general people need to know how to support the student, not the details of their circumstances.

Golden rules to sharing information

- The Data Protection Act 2018, UK GDPR and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Seek advice from other practitioners if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.

- Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety or wellbeing may be at risk. You will need to base your judgement on the facts of the case.
- Keep a record of your decision and the reasons for it. If you decide to share, then record what you have shared, with whom and for what purpose.

See also: Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers May 2024.

Our Data Protection Officer can support decision making on whether to share information when requested by an external third party. Contact dpo@catsglobalschools.com. In situations involving information about safeguarding, the DSL should be consulted in the first instance.

PRACTICALITIES REGARDING DISCLOSURES

You should always ensure that the time and place is appropriate to allow students to make a disclosure, if it is not, you should reassure the student that you understand they need to discuss something very important and that it warrants time, space and privacy. You should make time to meet before the end of the school day.

In accordance with the Safeguarding policy only work mobiles and email accounts should be used for any communication with students.

You should make clear at the beginning of the conversation or communication that there are limits to confidentiality. You should generally inform the student when a confidence has to be broken, but in some circumstances may speak to the DSL/Deputy DSL without informing the student.
You should not use leading questions when receiving a disclosure from a student. You should ensure that you take effective, verbatim notes, this will help to avoid asking the student having to repeat distressing matters to several people.

You must report any disclosures by students or parents involving the health or wellbeing of the student to the DSL as soon as possible after the disclosure.
This includes:

- Any form of abuse (physical, sexual, emotional or neglect).
- Substance misuse or risk-taking behaviour.
- Medical concerns (including mental health, such as indications of self-harm).

This is not an exhaustive list.

Such a disclosure to the DSL must be made in an appropriate setting; one in which others cannot overhear. Where appropriate disclosures can be documented via private notes on iSams/MyConcern.

Whenever appropriate, students should be encouraged to confide in their parents/legal guardian.

Never be worried about documenting disclosures which you think are too low level to be of concern, they may be a crucial piece of information to complete the picture for the DSL.

The DSL will decide what, if any, further action needs to be taken, both to ensure the student gets the help and support they need, and that the member of staff also gets the support and supervision they need.

SITUATIONS FOR IMMEDIATE REFERRAL TO THE DSL

If the student is in imminent danger and/or the student has made a disclosure involving abuse, neglect or exploitation, you should first attempt to contact the DSL/Deputy DSL. If you cannot do so then contact the police or social services as appropriate. Inform the DSL/Deputy DSL of your action as soon as is practicable. If the student needs immediate medical attention, contact the School nurses or emergency services.

In cases where there has been a disclosure of sexual abuse or physical harm you must make an immediate referral to the DSL/Deputy DSL.

SHARING BEHAVIOURAL INFORMATION FOR OVER-18 STUDENTS

Students should be encouraged to share breaches of School discipline with their parent/feepayer. If they refuse to do so the matter should first be escalated to the DSL, Senior Deputy Head or Head Teacher for them to speak with the student. In the unlikely event that the student still refuses to have their parent/feepayer informed, they may be given one chance to prove that they are able to change their behaviour without informing their parent/feepayer.

Any breach of discipline which jeopardises their place in the School (i.e. Stage 3 or above), or repeated breaches, may be reported to parent/feepayer regardless of consent being given by the student. Reasonable time should be given for the student to inform their parent/feepayer themselves before the message is passed by the School. The message passed should indicate where the breach has occurred (e.g. boarding house rules, or drug and alcohol policy) but will not necessarily include specifics of the incident if the student does not agree to this information being shared.

STATEMENT OF GROUND RULES TO BE USED IN LESSONS

In the classroom during a lesson (whether given by a member of teaching staff or an outside visitor, including health professionals), careful thought needs to be given to the content of the lesson, setting the climate and establishing ground rules to ensure confidential disclosures are not made.

It should be made clear to students that this is not the time or place to disclose confidential, personal information. We adopt ground rules to ensure a safe environment for teaching, in particular in PSHE.

This reduces anxiety to students and staff and minimises unconsidered, unintended personal disclosures.

At the beginning of any PSHE session, students are reminded of the ground rules by the teacher or outside visitor.

CONFIDENTIALITY FOR DIFFERENT ROLES

One to one disclosure to members of the School's staff (including voluntary staff)

It is essential all members of staff know the limits of the confidentiality they can offer to both students and parents/carers (see note below) and any required actions and sources of further support or help available both for the student or parent and for the staff member within the School and from other agencies, where appropriate. As a general principle, the School encourages students to discuss difficult issues with their parents, and vice versa. However, the needs of the student are paramount, and their preferences must also be given due consideration; the voice of the student must be heard. Where there is any concern about sharing of information School staff must seek advice from the DSL. The School will not automatically share information about the student with his/her parents unless it is considered to be in the child or young person's best interests.

Note: When concerns for a student come to the attention of staff, however insignificant they might appear to be, the member of staff must discuss this with the DSL/Deputy DSL as soon as is practically possible to ensure that any intervention necessary to protect the student is accessed as early as possible. Please see the School's Safeguarding and Child Protection Policy.

Disclosures to the School nurse, or welfare professional operating a confidential service in the School.

School nurses and welfare staff are skilled in discussing issues and possible actions with young people and always have in mind the need to encourage students to discuss issues with their parents. However, the needs of the student are paramount, and the staff will not insist that a student's parents are informed about any advice or treatment they give.

Health professionals such as School nurses can give confidential medical advice to students provided they are competent to do so and follow the Fraser Guidelines (guidelines for doctors and other health professionals on giving medical advice to under 16s). All health professionals must follow their professional codes of practice and the law. This means that they must make every effort to protect confidentiality. It also means that no identifiable information about a patient is passed to anyone or any agency without the express permission of that patient, except when this is essential for providing care or necessary to protect somebody's health, safety or wellbeing.

Confidentiality is the cornerstone of health care and central to the work of everyone working in general practice. All information about patients is confidential: from the most sensitive diagnosis to the fact of having visited the surgery or being registered at the practice. The duty of confidentiality owed to a person under 16 is as great as the duty owed to any other person.

LINKS TO OTHER SCHOOL POLICIES AND PROCEDURES:

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

- Misuse of Unprescribed Drugs
- Safeguarding and Child Protection
- Anti-Bullying
- Student Behaviour
- Whistleblowing