

# DATA PROTECTION & FREEDOM OF INFORMATION POLICY

## **A route to a positive future :**

Committed to providing a quality education to pupils with complex needs, including autism and sensory impairment in West Berkshire and Greater Reading



**Brookfields**  
Specialist SEN School

Reviewed : Spring 2019  
Due for Review : Spring 2020  
Policy Holder : A Brown (adapted  
from West Berkshire)  
Date : March 2019

## **Brookfields School Equalities Statement**

**All pupils at the school are offered a broad, balanced, stimulating and relevant curriculum regardless of their background, culture or ability. Each pupil is valued for who they are and what they bring to the school. We appreciate and celebrate the richness of diversity within the school community as well as the wider community. Through the work we do across the school on developing Values, we actively promote the importance of tolerance, co-operation, courage, determination, friendship and respect. Through this approach, pupils develop independence, confidence and integrity which prepares them for their future lives.**

## Brookfields School Data Protection Policy

This policy is adapted from a West Berkshire Council model policy and guide for schools

### **Aims & Objectives:**

The aim of this policy is to provide a set of guidelines to enable all members of staff to understand:

- The law regarding personal data
- The importance of Personal Data governance
- How personal data should be processed, stored, archived and deleted/destroyed
- How staff, parents and pupils can access personal data
- Examples of good practices

The objective of the policy is to ensure that the school acts within the requirements of the Data Protection Act 2018 (subject to Royal Assent) and General Data Protection Regulation (GDPR) when retaining and storing personal data, and when making it available to individuals.

### **Data Protection – the law:**

- Under the Data Protection Act 2018, and other regulating Acts, access to their own personal data is a statutory right for pupils (if they are of an age to understand the data they request) and parents (as defined in the Education Act 1996) may also request access to their child's personal data.
- School staff have a right of access to personal data on themselves.
- Anyone has the right to question and correct inaccurate data, but this must be matters of fact, not opinions.
- Personal data should always be kept securely and protected by passwords if it is electronic, and processing of the data should only be by those authorised to do so – maintaining privacy is the school's responsibility.
- The law also provides that personal data should not be kept longer than is required.
- Third party data (information about someone other than the requesting individual) should in general only be provided with their permission.
- Thomas Ng West Berkshire Council [Thomas.Ng@westberks.gov.uk](mailto:Thomas.Ng@westberks.gov.uk) is the named person with overall responsibility for personal data within the school.

### **The importance of Personal Data governance:**

The smooth running of a school involves a high level of trust amongst all members of the school community. When large amount of personal data are being stored in IT and paper-based systems set up by the school, data protection is an important responsibility for all members of staff.

There are many benefits:- imagine the time we can all save from sharing a well organised archive where teachers can search for pupil data easily; imagine the reputational damage the school would suffer from if ransomware managed to get onto our school system and we have to pay a large sum of money or suffer from days of system outage?

### **Fair processing of personal data: data which may be shared**

Schools, local education authorities and the Department for Education (DfE) all hold information on pupils in order to run the education system, and in doing so have to follow the Data Protection and related Acts. This means, among other things, that the data held about pupils must only be used for specific purposes allowed by law. The school has a Fair Processing or Privacy Notice which explains how personal data is used and with whom it will be shared. This Notice is given in Appendix 1.

### **Processing, storing, archiving and deleting personal data: guidance**

- Personal data and school records about pupils are confidential to the child. The information can be shared appropriately within the professional working of the school to enable the school to make the best educational provision for the child. The law permits such information to be shared with other educational establishments when pupils change schools.
- School records for a child are kept for seven years after the child leaves the school unless subject to legal hold and / or for children with special educational needs.
- Data on staff is sensitive information and confidential to the individual. It is only shared, where appropriate, at the discretion of the Headteacher and with the knowledge, and if possible the agreement of the staff member concerned. This includes data on school-provided e-mail systems.
- Employment records form part of a staff member's permanent record. Because there are specific legislative issues connected with these (salary and pension details etc.) these records should be retained as set out by the Local Authority
- Interview records, CVs and application forms for unsuccessful applicants are kept for 6 months.
- All formal complaints made to the Head Teacher or School Governors will be kept for at least seven years in confidential files, with any documents on the outcome of such complaints. Individuals concerned in such complaints may have access to such files subject to data protection and to legal professional privilege in the event of a court case.
- All members of staff should only access school-provided systems (including e-mail) up to the last day of employment.

### **Accessing personal data: guidance**

- A child can request access to his/her own data. The request is not charged and does not have to be in writing. The staff will judge whether the request is in the child's best interests, and that the child will understand the information provided. They may also wish to consider whether the request has been made under coercion. All decisions should be documented.
- A parent can request access to or a copy of their child's school records and other information held about their child. The request must be made in writing. There is no charge for such requests on behalf of the child, but there may be an agreed charge for photocopying existing non-digital records. Staff should check, if a request for information is made by a parent, that no other legal obstruction (for example, a court order limiting an individual's exercise of parental responsibility) is in force.
- Parents should note that all rights under the Data Protection Act to do with information about their child rest with the child as soon as they are old enough to understand these rights. This will vary from one child to another, but, as a broad guide, it is reckoned that most children will have a sufficient understanding by the age of 12. Parents are encouraged to discuss and explain any request for information with their child if they are aged 12 or over.
- Separately from the Data Protection Act, The Education (Pupil Information)(England) Regulations 2005 provide a pupil's parent (regardless of the age of the pupil) with the right to view, or to have a copy of, their child's educational record at the school. Parents who wish to exercise this right must apply to the school in writing.
- For educational records (unlike other personal data; see below) access must be provided within 15 school days, and if copies are requested, these must be supplied within 15 school days of payment of the cost of copying.
- A member of staff can request access to their own records at no charge, but the request must be made in writing. The member of staff has the right to see their own records, and to ask for copies of the records. There is no charge for copies of records.
- GDPR requires that all requests for personal information are dealt with within 1 month of receipt except requests for educational records (see above) or with agreement with the Data Subject. All requests will be acknowledged in writing on receipt, and access to records will be arranged as soon as possible. If awaiting third party consents, the school will arrange access

to those documents already available, and notify the individual that other documents may be made available later.

- In all cases, should third party information (information about another individual) be included in the information the staff will try to obtain permission from the third party to show this information to the applicant. If third party permission is not obtained the person with overall responsibility should consider whether the information can still be released.
- Personal data should always be of direct relevance to the person requesting the data. A document discussing more general concerns may not be defined as personal data.
- Under the Freedom of Information Act, a request for personal information can include unstructured as well as structured records – for example, letters, emails etc. not kept within an individual's personal files, or filed by their name, but still directly relevant to them. If these would form part of a wider record it is advisable to file these within structured records as a matter of course and to avoid excessive administrative work in the future.
- Anyone who requests to see their personal data has the right to question the accuracy of matters of fact within the data, and to ask to have inaccurate information deleted or changed. They may also question opinions, and their comments will be recorded, but opinions do not need to be deleted or changed as a part of this process.
- The school will document all requests for personal information with details of who dealt with the request, what information was provided and when, and any outcomes (letter requesting changes etc.) This will enable staff to deal with a complaint if one is made in relation to the request.

### **Examples of good practices**

- Only school-provided data storage (which are centrally archived/encrypted) should be used to store work-related personal data. No USB pen is to be used for storing personal data.
- Avoid using unknown supplier of WiFi services for work activities which involved personal data.
- Do not open uninvited e-mail from unrecognised source – check its source with a phone call or delete the mail item without opening any attachment / click on any links.
- Only use computers which have operational anti-virus software.
- Use secure e-mail tool where available by default for all external communication involving personal data.
- Look out for unexpected behaviour of your computer – if in doubt, check with a colleague.
- Log queries as questions for your next CPD – everything has an explanation.
- Work to separate (storage of) personal and non-personal data as and when data are being worked on.
- Get to know the steps you need to follow when personal data is lost / leaked to the open world.
- Practice what we preach – children would pick up good practices from us – it is their future we are working to safeguard.

# Appendix 1

## Brookfields School Privacy Notices

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## **1. Privacy notice for parents/carers**

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **pupils**.

We, Brookfields School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Thomas Ng, West Berkshire Council (see 'Contact us' below).

### **The personal data we hold**

Personal data that we may collect, use, store and share (when appropriate) about pupils includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

### **Why we use this data**

We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare

- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing

### **Our legal basis for using this data**

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)
- We have legitimate interests in processing the data (ie reasons where it could be reasonably expected that we would hold and process the data and which have a minimal privacy impact, or where there is a compelling justification for the processing). An example of this could be the administration of the After School Club, Youth Club or Holiday Club.

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

### **Collecting this information**

While the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

### **How we store this data**

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. The Information Management Toolkit for Schools sets out how long we keep information about pupils. It can be viewed [here](#), and is generally the date of birth of a pupil plus 25 years.

### **Data sharing**

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about pupils with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusions*
- *The Department for Education*
- *The pupil's family and representatives*
- *Educators and examining bodies*
- *Our regulator ( Ofsted)*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for*
- *Financial organisations*
- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*

### **National Pupil Database**

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census. Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department and provides evidence on school performance to inform research.

The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The Department for Education may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

For more information, see the Department's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) with any further questions about the NPD.

## **Youth support services**

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to West Berkshire Council (and/or the local authority that the pupil lives in), as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our data protection officer to request that we only pass the individual's name, address and date of birth to West Berkshire Council (and/or the local authority that the pupil lives in).

## **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

## **Parents and pupils' rights regarding personal data**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

If you make a subject access request, and if we do hold information about you or your child, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you or your child
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request please contact our data protection officer.

Parents/carers also have a legal right to access to their child's **educational record**. To request access, please contact the school office manager.

## **Other rights**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)

- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

### **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Thomas Ng West Berkshire Council [Thomas.Ng@westberks.gov.uk](mailto:Thomas.Ng@westberks.gov.uk)
- 

*This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended for parents and to reflect the way we use data in this school.*

## **2. Privacy notice for pupils**

You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This privacy notice explains how we collect, store and use personal data about you.

We, Brookfields School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Thomas Ng, West Berkshire Council (see 'Contact us' below).

### **The personal data we hold**

We hold some personal information about you to make sure we can help you learn and look after you at school.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images

### **Why we use this data**

We use this data to help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Look after your wellbeing

### **Our legal basis for using this data**

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law

- We need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)
- We have legitimate interests in processing the data (ie reasons where it could be reasonably expected that we would hold and process the data and which have a minimal privacy impact, or where there is a compelling justification for the processing).

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent. Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

### **Collecting this information**

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

### **How we store this data**

We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

We usually keep information about you until 25 years after your date of birth.

### **Data sharing**

We do not share personal information about you with anyone outside the school without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- *Our local authority – to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions*
- *The Department for Education (a government department)*
- *Your family and representatives*
- *Educators and examining bodies*
- *Our regulator (the organisation or "watchdog" that supervises us), ([specify as appropriate, e.g. Ofsted, Independent Schools Inspectorate])*
- *Suppliers and service providers – so that they can provide the services we have contracted them for*
- *Financial organisations*

- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*
- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*

### **National Pupil Database**

We are required to provide information about you to the Department for Education (a government department) as part of data collections such as the school census.

Some of this information is then stored in the [National Pupil Database](#), which is managed by the Department for Education and provides evidence on how schools are performing. This, in turn, supports research.

The database is held electronically so it can easily be turned into statistics. The information it holds is collected securely from schools, local authorities, exam boards and others.

The Department for Education may share information from the database with other organisations which promote children's education or wellbeing in England. These organisations must agree to strict terms and conditions about how they will use your data.

You can find more information about this on the Department for Education's webpage on [how it collects and shares research data](#).

You can also [contact the Department for Education](#) if you have any questions about the database.

### **Youth support services**

Once you reach the age of 13, we are legally required to pass on certain information about you to West Berkshire Council (and/or the local authority that you live in), as it has legal responsibilities regarding the education or training of 13-19 year-olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you once you're 16, can contact our data protection officer to ask us to only pass your name, address and date of birth to West Berkshire Council (and/or the local authority that you live in).

### **Transferring data internationally**

Where we share data with an organisation that is based outside the European Economic Area, we will protect your data by following data protection law.

## **Your rights**

### **How to access personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a '**subject access request**', as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request please contact our data protection officer.

### **Your other rights over your data**

You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress
- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way

## **Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.

You can make a complaint at any time by contacting our data protection officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer:

- Thomas Ng West Berkshire Council [Thomas.Ng@westberks.gov.uk](mailto:Thomas.Ng@westberks.gov.uk)

*This notice is based on the [Department for Education's model privacy notice](#) for pupils, amended to reflect the way we use data in this school.*

### **3. Privacy notice for staff**

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our school.

We, Brookfields School, are the 'data controller' for the purposes of data protection law.

Our data protection officer is Thomas Ng, West Berkshire Council (see 'Contact us' below).

#### **The personal data we hold**

We process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions

- Trade union membership
- Health, including any medical conditions, and sickness records

### **Why we use this data**

The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

### **Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data (ie reasons where it could be reasonably expected that we would hold and process the data and which have a minimal privacy impact, or where there is a compelling justification for the processing). An example of this could be the administration of non-educational activities such as Book Club and Staff uniform purchases.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your data.

### **Collecting this information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

#### **How we store this data**

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the irms Information Management Toolkit for Schools that sets out how long we keep information about staff. It can be viewed [here](#).

#### **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- *Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and [maintained schools only] information about headteacher performance and staff dismissals*
- *The Department for Education*
- *Your family or representatives*
- *Educators and examining bodies*
- *Our regulator [Ofsted]*
- *Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll*
- *Financial organisations*
- *Central and local government*
- *Our auditors*
- *Survey and research organisations*
- *Trade unions and associations*
- *Health authorities*
- *Security organisations*
- *Health and social welfare organisations*
- *Professional advisers and consultants*

- *Charities and voluntary organisations*
- *Police forces, courts, tribunals*
- *Professional bodies*
- *Employment and recruitment agencies*

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **Your rights**

#### **How to access personal information we hold about you**

Individuals have a right to make a '**subject access request**' to gain access to personal information that the school holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our data protection officer.

#### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our data protection officer.

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our data protection officer.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Thomas Ng West Berkshire Council [Thomas.Ng@westberks.gov.uk](mailto:Thomas.Ng@westberks.gov.uk)

*This notice is based on the [Department for Education's model privacy notice](#) for the school workforce, amended to reflect the way we use data in this school.*

## Appendix 2

### Personal data used for research purposes

This appendix applies to all school staff and associated research partners; research partners proposing to work with pupils or staff within the school, during or after school hours.

It sets out the framework for ethical guidelines for research conducted within the school involving pupils or staff, and involves the sharing of information related to research projects.

The Governing board is committed to ensuring consistency of treatment and fairness in the operation of approving research work within the school.

### ETHICAL CODE

This Code is informed by the principles established in the Revised Ethical Guidelines for Education Research (2004) issued by the British Educational Research Association (BERA)<sup>1</sup>.

All researchers participating in research projects at Brookfields School will be required to sign a declaration of their agreement to abide fully by this ethical code. An example agreement is included in Appendix 3.

The researchers<sup>2</sup> recognise the rights of all professional colleagues, parents/carers and students who participate in the research to have their confidentiality protected at all times.

Written voluntary informed consent will be sought before any data will be gathered (ie through observations, interviews, questionnaires and document scrutiny) with any respondent as part of the research process. In the case of the school pupils, this consent will be sought through Brookfields School and obtained in writing before any data collection begins; parents and carers have the right to refuse participation and will not be pressured or coerced into taking part in the research.

Participants in the research have a right to withdraw from the process at any time up to a specified point and will be informed of both this right and the specified point date before they begin participating in the research.

The researchers will work in accordance with Articles 3 and 12 of the United Nations Convention on the Rights of the Child and will ensure that the best interest of children is served at all times. Children will be facilitated to give informed consent and this will be in addition to the consent given by parents or carers.

All adults involved in the research process who have direct contact with children will be subject to Disclosure & Barring Service (DBS) checks prior to the start of the research project.

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<sup>1</sup> BERA (2004) Revised Ethical Guidelines for Educational Researchers, Southwell: British Educational Research Association

<sup>2</sup> The Researchers refer to those individuals named as part of an application process for research at Brookfields School and may include academic staff from universities involved in research projects along with university administrators

In circumstances where children or adults use non-traditional orthography or alternative modes of communication, the researchers will take full account of this in seeking informed consent and will endeavour to provide support and full access to information.

The researchers are under an obligation to describe accurately, truthfully and fairly any information obtained during the course of the research. In circumstances where children or adults use non-traditional orthography, or alternative modes of communication, the researchers are also under an obligation to protect the anonymity of these individuals, and must represent any findings from these interactions accordingly.

There is an obligation to incorporate accurately data collected during the course of this research into the text of any report or other publication related to the research, and to ensure that individual opinions and perceptions are not misrepresented.

The researchers will protect the sources of information gathered from interviews, focus groups, document scrutiny, observations and other data collection methods.

The researchers will communicate to the research sponsors the extent to which their data collection and analysis techniques and the inferences drawn from these are reliable, valid and generalisable.

Data collected as part of the research process will be securely maintained and will be accessible only to the researchers engaged in this project. Electronic data will be secured through password systems and will be shared only amongst the research team. The secure storage of data for each project will be agreed between the researchers and Brookfields school, as part of the Ethical Approval Form (Appendix 3), in case any research projects have specific security requirements.

The researchers will report the procedures, results and analysis of the research accurately, and in sufficient detail to allow all interested parties to understand and interpret them.

The researchers will make themselves available to discuss the procedures, conduct, or findings of the research with any party involved in the research process.

Any research reports pertaining to research at Brookfields School will be made available in both paper and electronic format to the school.

Data collected during the course of the research project which names individuals or institutions will be available only to the researchers and will be made secure both during and after the term of the project.

The researchers are obliged to communicate the findings of their research to other members of the educational research community through research seminars, conference presentation and proceedings and publication taking account of all issues of confidentiality and protection of research participants.

The researchers assert their right to participate in any publication of the research findings in academic journals or other media, which may ensue from the research. Any such publication will be informed of this Code of Ethics and they must agree to adhere to it before any agreement on publication is made.

Signed: .....  
Policy Holder

Date: .....

Signed: .....  
Headteacher/Governor

Date: .....

## **Guidance:**

### **Data Protection:**

#### **Processing, storing, archiving and deleting personal data: guidance**

A record retention schedule is available from the Information and Records Management Society (details given below)

- Personal data and school records about pupils are confidential to the child. The information can be shared appropriately within the professional working of the school to enable the school to make the best educational provision for the child. The law permits such information to be shared with other educational establishments when pupils change schools.
- School records for a child should be kept for 7 years after the child leaves the school, or until the child reaches 25 years of age (whichever is greater) and examination records the same.
- Data on staff is sensitive information and confidential to the individual, and is shared, where appropriate, at the discretion of the Head Teacher and with the knowledge, and if possible the agreement of the staff member concerned.
- Employment records form part of a staff member's permanent record. Because there are specific legislative issues connected with these (salary and pension details etc.) these records should be retained as set out by the LA or in the retention schedule of the school.
- Interview records, CV's and application forms for unsuccessful applicants are kept for 6 months.
- All formal complaints made to the Head Teacher or School Governors, in accordance with the school's Complaints Procedure, will be kept for at least seven years in confidential files, with any documents on the outcome of such complaints. Individuals concerned in such complaints may have access to such files subject to data protection and to legal professional privilege in the event of a court case.
- There may be other circumstances in which information can or has to be disclosed for example in court proceedings.. If you are in any doubt, please contact the LA's Information Management Officer.

#### **Accessing personal data: guidance**

- A child can request access to his/her own data. The request is not charged and does not have to be in writing. The staff will judge whether the request is in the child's best interests, and that the child will understand the information provided. They may also wish to consider whether the request has been made under coercion.
- A parent can request access to or a copy of their child's school records and other information held about their child. The request must be made in writing. There is no charge for such requests on behalf of the child, but there may be a charge for photocopying records – this is detailed in guidance available from the Information Commissioner. Staff should check, if a request for information is made by a parent, that no other legal obstruction (for example, a court order limiting an individual's exercise of parental responsibility) is in force.
- Parents should note that rights under the Data Protection Act to do with information about their child rest with the child as soon as they are old enough to understand these rights. This will vary from one child to another, but, as a broad guide, it is reckoned that most children will have a sufficient understanding by the age of 12. Parents are encouraged to discuss and explain any request for information with their child where they have sufficient understanding and/or if they are aged 12 or over
- Separately from the Data Protection Act, The Education (Pupil Information)(England) Regulations 2005 (as amended) provide a pupil's parent (regardless of the age of the pupil) with the right to view, or to have a copy of, their child's educational record at the school. Parents who wish to exercise this right must apply to the school in writing.

- For educational records (unlike other personal data; see below) access must be provided within 15 school days, and if copies are requested, these must be supplied within 15 school days of payment.
- A member of West Berkshire Council staff can request access to their own records at no charge, but the request must be made in writing. The member of staff has the right to see their own records, and to ask for copies of the records. There is no charge for copies of records.
- The law requires that all requests for personal information are dealt with within 40 days of receipt except requests for educational records (see above). All requests will be acknowledged in writing on receipt, and access to records will be arranged as soon as possible. If awaiting third party consents, the school will arrange access to those documents already available, and notify the individual that other documents may be made available later.
- In all cases, should third party information (information about another individual) be included in the information the staff will try to obtain permission to show this information to the applicant, with the exception of information provided by another member of school staff (or local authority staff) which is exempt from a requirement for third party consents. If third party permission is not obtained the person with overall responsibility should consider whether the information can still be released.
- Personal data should always be of direct relevance to the person requesting the information. A document discussing more general concerns may not be defined as personal data.
- From 1<sup>st</sup> January 2005, when the Freedom of Information Act came into force, a request for personal information can include unstructured as well as structured records – for example, letters, emails etc. not kept within an individual's personal files, or filed by their name, but still directly relevant to them. If these would form part of a wider record it is advisable to file these within structured records as a matter of course and to avoid excessive administrative work. These can be requested if sufficient information is provided to identify them.
- Anyone who requests to see their personal data has the right to question the accuracy of matters of fact within the data, and to ask to have inaccurate information deleted or changed. They may also question opinions, and their comments will be recorded, but opinions do not need to be deleted or changed as a part of this process.
- The school will document all requests for personal information with details of who dealt with the request, what information was provided and when, and any outcomes (letter requesting changes etc.) This will enable staff to deal with a complaint if one is made in relation to the request.
- There are exemptions to providing personal information, for example where the school consider doing so would cause serious harm to someone. If you are in any doubt, please contact the LA's Information Management Officer.

## **Freedom of Information**

### **Access to other school information – guidance on Freedom of Information Publication Schemes**

- Under the Freedom of Information Act 2000, all schools (primary, secondary and nursery) should have a 'publication scheme' – essentially a formal list of the types of non-personal information which the school produces or holds, and which is readily accessible to staff, pupils and parents or other enquirers.
- The publication scheme should be available as a hard copy. The model scheme supplied by the Information Commissioner's Office should have been adopted from August 2013.
- Schools can link this document via their website to a list of publications with details of contacts and costs, and any appropriate downloads.
- There should be a named person with overall responsibility for published information within each school. In most cases this would be the Head Teacher. Their details should be available on the website with the Publication Scheme.

## Requests for information

- Requests should be acknowledged within three school days and answered in 20 working days or 20 school days (this applies where requests come in shortly before school holidays).
- Any refusal of information must include details of the exemption used and a public interest test if this applies. Speak to the LA's Information Management Officer email [sellis@westberks.gov.uk](mailto:sellis@westberks.gov.uk) for guidance on this.
- All requesters should be advised they can request a review of the handling of their request if they are dissatisfied with the response – this should be carried out by another staff member or a Governor. The LA's Information Management Officer can provide guidance on the statutory FoI review process if required.
- After a review, requesters may contact the Information Commissioner if they remain dissatisfied and should be directed to his office. Again, ask for advice on this process from the LA's Information Management Officer.

## Useful Guidance:

### Information Commissioner

The Information Commissioner is the Regulator for Data Protection and Freedom of Information and provides tailored guidance for schools on his website.

<https://ico.org.uk/for-organisations/education/>

Refer to the website for the most up to date guidance on a range of Data Protection and Freedom of Information issues. Model publication schemes can be found here:

<https://ico.org.uk/for-organisations/guide-to-freedom-of-information/publication-scheme/definition-documents/>

### Department for Education

The Department for Education provides guidance on statutory responsibilities and non-statutory guidance. Advice on Data Protection and Freedom of Information can be found here:

<https://www.gov.uk/government/collections/departmental-advice-schools#data-protection>

Statutory guidance is here:

<https://www.gov.uk/government/collections/statutory-guidance-schools#administration-and-finance>

Non-statutory advice is here:

<https://www.gov.uk/government/collections/departmental-advice-schools>

### Disclosure and Barring Service (DBS)

The DBS (previously the Criminal Records Bureau), provides advice on checks for employees and those who work with children, and guidance can be found here:

<https://www.gov.uk/disclosure-barring-service-check/overview>

### Information and Records Management Society – Schools records management toolkit

<http://www.irms.org.uk/resources/information-guides/199-rm-toolkit-for-school>

A downloadable schedule for all records management in schools

## Legislation:

**Data Protection Act 1998:** All personal data which is held must be processed and retained in accordance with the eight principles of the Act and with the rights of the individual. Personal data must not be kept longer than is necessary (this may be affected by the requirements of other Acts in relation to financial data or personal data disclosed to Government departments). Retention of personal data must take account of the Act, and personal data must be disposed of as

confidential waste. Covers both personal data relating to employees and to members of the public.

**Education (Pupil Information) (England) Regulations 2005 (as amended):** Retention of Pupil records, and rights to access these.

**Freedom of Information Act 2000:** The Freedom of Information Act covers the rights of requesters to request and receive information held in a recordable format by the public authority (for schools this is the school, not the Governing board). There are a number of exemptions under which a refusal can be made, but all public authorities must offer requesters the opportunity to have a review of any refusal, and must direct them to the Information Commissioner if they remain dissatisfied.

Revised March 2015

Susan Ellis

[sellis@westberks.gov.uk](mailto:sellis@westberks.gov.uk)

## Appendix 3 - Ethical Approval Form

for staff and student research involving the participation of other people

Type of project:	STAFF / POSTGRADUATE / UNDERGRADUATE <i>(delete as appropriate)</i>
Title of project:	[Click and type here]
Name of researcher(s):	[Click and type here]
Name of supervisors(s):	[Click and type here] <i>(for student research)</i>
Date:	[Click and type here]

	<i>Mark with ✓ in box</i>	YES	NO	N/A
1a	Will you describe the main experimental procedures to participants in advance, so that they are informed about what to expect?			
1b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
2a	Will you tell your participants that their participation is voluntary?			
2b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
3a	Will you obtain written consent for participation?			
3b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
4a	If the research is observational, will you ask participants for their consent to being observed?			
4b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
5a	Will you tell participants that they may withdraw from the research for any reason and the specified date to which they can withdraw?			
5b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
6a	With questionnaires, will you give participants the option of omitting questions they do not want to answer?			
6b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
7a	Will you tell participants that their data will be treated with full confidentiality and that, if published, it will not be identifiable as theirs?			
7b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
8a	Will you debrief participants at the end of their participation (i.e. give them a brief explanation of the study)?			
8b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
9a	With interviews, will you tell your participants that you wish to record the interview, and that they may decline to have their interview recorded?			
9b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			

10a	With research that requires audio or video recordings, will you tell your participants that their permission will be sought to play any excerpts in the course of presentations given?			
10b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			
11a	Will you ensure that data and findings from the research are stored securely, on password protected devices or in locked filing cabinets etc.?			
11b	If 'YES', please provide explanation to your answer above, how you will ensure it is done:			

If you have marked **No** to any of Q1-11, but have **marked Box A** below, please give an explanation on a separate sheet. (Note: N/A = not applicable).

	Mark with ✓ in box	YES	NO	N/A
12	Will your project involve deliberately misleading participants in any way?			
13	Is there any realistic risk of any participants experiencing either physical or psychological distress or discomfort? If <b>Yes</b> , give details on a separate sheet and state what you will tell them to do if they should experience any problems (e.g. who they can contact for help).			

If you have marked **Yes** to Q12 or 13 you should normally **mark Box B** overleaf; if not, please give a full explanation on a separate sheet.

	Mark with ✓ in box	YES	NO	N/A	
14	Does your project involve work with animals? If yes, please <b>mark Box B</b> overleaf.				
15	Do participants fall into any of the following special groups? If so, please refer to BERA guidelines, and <b>mark Box B</b> overleaf. <b>You should ensure that you have DBS clearance.</b>	School children (under 18 years of age)			
		People with learning or communication difficulties			
		Patients			
		People in custody			
		People engaged in illegal activities (e.g. drug-taking)			

**There is an obligation on the lead researcher to bring to the attention of the Headteacher any issues with ethical implications not clearly covered by the above checklist.**

PLEASE MARK **EITHER** BOX A OR BOX B BELOW AND **PROVIDE THE DETAILS REQUIRED** IN SUPPORT OF YOUR APPLICATION. THEN PRINT AND SIGN THE FORM.

Mark with ✓

**A.** I consider that this project has **no significant** ethical implications to be brought before the Headteacher.

**Give a brief description of participants and procedure (methods, tests used etc.), and any potential ethics concerns that could arise as a result**

*Please refer to any potential ethical concerns in **your** project; do not discuss general ethics issues. Consider here also possible physical, psychological, economic or reputational harm that could result. (max. 150 words).*

[Click and type here]

**OR**

Mark with ✓

**B.** I consider that this project **may** have ethical implications that should be brought before the Headteacher, and/or it will be carried out with children, vulnerable young people or vulnerable adults.

**Please provide all the further information listed below in a separate attachment.**

1. Title of project
2. Purpose of project and its academic rationale
3. Brief description of methods and measurements
4. Participants: recruitment methods, number, age, sex, exclusion/inclusion criteria
5. How you will obtain informed consent and provide debriefing
6. A clear and concise statement of the ethical considerations raised by the project and how you intend to deal with them
7. Estimated start date and duration of project

Please tick the box to indicate (✓):

I have read and am familiar with *either* the BERA Ethical Guidelines (<http://www.bera.ac.uk/wp-content/uploads/2014/02/BERA-Ethical-Guidelines-2011.pdf>)

and (if appropriate) I have discussed them with the other researchers involved in the project.

I have read and am familiar with *Articles 3 and 12 of the United Nations Convention on the Rights of the Child, and will conduct my research accordingly*

**Signed:** ..... **Print name:** ..... **Date:** .....  
(Lead Researcher or Supervisor, if applicable)

**Signed:** ..... **Print name:** ..... **Date:** .....  
(Headteacher)

*Please turn to next page.*

**Summary**

Your application should consist of:

1. Your signed Ethics Approval Form (no more than the equivalent of three sides of A4) with attachments if appropriate
2. Consent form (1 side)
3. Participant information sheet (no more than 2 sides).

An electronic copy of the submission, formatted into one file, should be sent to the Headteacher:  
[headteacher@brookfields.w-berks.sch.uk](mailto:headteacher@brookfields.w-berks.sch.uk)

## Notes on completing the form

**PLEASE DELETE THESE NOTES PAGES ONCE YOU HAVE COMPLETED YOUR FORM.  
DO NOT INCLUDE THEM WITH YOUR APPLICATION.**

NOTE: THIS FORM SHOULD BE COMPLETED ELECTRONICALLY, AND MUST NOT GO OVER TWO SIDES.

Research involving the participation of other people is hence defined broadly to include research that:

- i. Directly involves people in the research activities, through their physical participation. Physical participation may signify invasive and/or non-invasive research (e.g. interviews, questionnaires, surveys, observational research) and may mean the active or passive involvement of a person;
- ii. Indirectly involves people in the research activities, through their provision of or access to personal data and/or tissue;
- iii. Involves people on behalf of others (e.g. parents/legal guardians of children and the psychologically and/or physically impaired, and supervisors of people under controlled environments [e.g. pupils]).

Some people participating in research may be more particularly vulnerable to harm than others. Particularly vulnerable groups include:

- i. Infants and children under the age of eighteen;
- ii. People with physiological and/or psychological impairments and/or learning difficulties;
- iii. People dependent on the protection or under the control or influence of others (e.g. children, pupils, people in care, young offenders, prisoners, employees/fellow staff, students);
- iv. Relatives of sick people (e.g. parents of sick children);
- v. People who may have only a basic or elementary knowledge of the English language.

Sensitive personal data consist of information as to:

- i. The racial or ethnic origin of the participant,
- ii. His or her political opinions,
- iii. His or her religious beliefs or other beliefs of a similar nature,
- iv. Whether he or she is a member of a trade union (within the meaning of the Trade Union and Labour Relations (Consolidation) Act 1992),
- v. His or her physical or mental health or condition,
- vi. His or her sexual life,
- vii. The commission or alleged commission by him or her of any offence, or
- viii. Any proceedings for any offence committed or alleged to have been committed by him or her, the disposal of such proceedings or the sentence of any court in such proceedings.

After participating in the research, participants must be debriefed in a positive manner regardless of how successfully you think they have completed the task.

APPLICANTS **MUST** READ THE ETHICAL GUIDELINES FOR EDUCATIONAL RESEARCH PUBLISHED BY THE BRITISH EDUCATIONAL RESEARCH ASSOCIATION **BEFORE** SIGNING THE FORM.

This document can be found at: <http://www.bera.ac.uk/wp-content/uploads/2014/02/BERA-Ethical-Guidelines-2011.pdf>

## **Guidance on producing Participant Information Sheets**

Participant Information Sheets should be designed to assist participants to make informed choices. Potential recruits need to be given sufficient information to allow them to decide whether or not they want to take part, and should they take part, it should be made clear that they are free to withdraw at any time. Researchers should take the steps necessary to ensure that all participants in the research understand the process in which they are to be engaged, including why their participation is necessary, how it will be used and how and to whom it will be reported.

Below is a recommended structure and information to include in a participant information sheet. Your information sheet should be no more than two sides of A4 and should include all of the following headings:

### **Research project title**

Is the title self-explanatory? If not, a simplified title should be included.

### **Invitation paragraph**

This should explain that the participant is being asked to take part in a research project. The following is a suitable example:

You are being invited to take part in a research project. Before you decide, it is important for you to understand why the research is being done and what it will involve. Please take time to read the following information carefully and discuss it with others if you wish. Ask me/us if there is anything that is not clear or if you would like more information. Take time to decide whether or not you wish to take part. Thank you for reading this.

### **What is the purpose of the project?**

The background and aim of the project should be given here. Also mention the project's duration.

### **Why have I been chosen?**

You should explain how the participant was chosen and how many other participants will be studied.

### **Do I have to take part?**

You should explain that taking part in the research is entirely voluntary and that refusal to participate will involve no penalty or loss of benefits to which the participant is otherwise entitled, and the participant may discontinue participation at any time without penalty or loss of benefits, to which the participant is otherwise entitled. You could use the following paragraph:

It is up to you to decide whether or not to take part. Refusal to take part will involve no penalty or loss of benefits to which you are otherwise entitled. If you do decide to take part you will be given this information sheet to keep (and be asked to sign a consent form). If you decide to take part you are still free to withdraw at any time, without penalty or loss of benefits, and without giving a reason.

### **What will happen to me if I take part?**

You should say how long the participant will be involved in the research, how long the research will last (if this is different), how often they will need to participate and for how long each time. You should set out simply the research methods you intend to use.

### **What do I have to do?**

State if there are any lifestyle restrictions as a result of participating.

**What are the possible disadvantages and risks of taking part?**

Any reasonably foreseeable discomforts, disadvantages and risks need to be stated. Any unexpected discomforts, disadvantages and risks to participants, which arise during the research, should be brought immediately to their attention.

**What are the possible benefits of taking part?**

Any benefits to the participants that can reasonably be expected should be stated. However, where there is no intended benefit to the participant from taking part in the project this should be stated clearly. It is important not to exaggerate the possible benefits to the particular participant during the course of the project. This could be seen as coercive. Depending on the particular proposed project the following sentence might be useful:

While there are no immediate benefits for those people participating in the project, it is hoped that this work will ...

**What happens if the study has to be terminated?**

If this is the case the reason(s) should be explained to the participant.

**Will my taking part in this project be kept confidential?**

You will need to obtain the participant's permission to allow restricted access to information collected about them in the course of the project. You should explain that all information collected about them will be kept strictly confidential. You are responsible for ensuring that when collecting or using data, you are not contravening the legal or regulatory requirements in any part of the UK. A suggested form of words is:

All information which is collected about you during the course of the research will be kept strictly confidential. Any information about you that is disseminated will have your name and address removed so that you cannot be identified by it.

**What happens immediately after data collection?**

You should tell your participants that they will be debriefed immediately after data collection, providing them with any further information that they might need in order to complete their understanding of the research.

**What will happen to the results of the research project?**

You should be able to tell the participants what will happen to the results of the research. Where can they obtain a copy of the results? You might add that they will not be identified in any report. Depending on the nature of your proposed project, you may need to include a statement indicating that the data collected during the course of the project might be used for additional or subsequent research.

**Who has reviewed the project?**

You should tell your participants that the project has been reviewed by the Headteacher.

**Contact for further information**

You should give the participant your contact information (name, address and telephone number) and that of your supervisor (if applicable).

**Remember to thank the participants taking part in the project!**

**The Participant Information Sheet should state that the participant will be given a copy of the Participant Information Sheet and, if appropriate, a signed Participant Consent Form to keep.**

## Guidance on producing Participant Consent Forms

Recommended format for a Participant Consent Form:

<b>Title of Project:</b>		
<b>Name of Researcher:</b>		
<b>Participant Identification Number for this project:</b>		
		<b>Please initial box</b>
1. I confirm that I have read and understand the information sheet/letter (delete as applicable) dated [Insert date] for the project in which I have been asked to take part and have had the opportunity to ask questions.		<input type="checkbox"/>
2. I understand that my participation is voluntary and that I am free to withdraw at any time without giving any reason.		<input type="checkbox"/>
3. I understand that my responses will be anonymised before analysis. I give permission for members of the research team to have access to my anonymised responses. I understand that all personal data about me will be kept confidential.		<input type="checkbox"/>
4. I understand that the investigator(s) must adhere to the BERA Ethical Guidelines.		<input type="checkbox"/>
5. I agree to take part in the above research project.		<input type="checkbox"/>
_____	_____	_____
<b>Name of participant</b>	<b>Date</b>	<b>Signature</b>
_____	_____	_____
<b>Name of person taking consent</b> <small>(if different from lead researcher)</small>	<b>Date</b>	<b>Signature</b>
_____	_____	_____
<b>Researcher</b>	<b>Date</b>	<b>Signature</b>

### Copies

One copy for the participant, and one copy for the supervisor or researcher.