




ASHMORE PARK

AND

PHOENIX NURSERY SCHOOLS
FEDERATION

INFORMATION AND GOVERNANCE
POLICY

Senior Leadership Team/Compliance Governor(s) Review Date	20.03.2023
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Signed on behalf of the Governing Board/Committee	
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1. Introduction

Information is a vital asset, both for the provision of services and for the efficient management of services and resources. Without it, informed and validated decisions cannot be made to benefit both schools in the Ashmore Park and Phoenix Nursery Schools Federation and the children and parents that it serves. It is therefore imperative that the Federation has appropriate standards, policies and procedures in place that forms a robust information management framework.

2. Purpose

The purpose of this document is to give an overview of the information governance framework that Ashmore Park and Phoenix Nursery Schools Federation has in place to ensure that each School:

- **Holds** information securely and confidently
- **Obtains** information fairly and efficiently
- **Records** information accurately and reliably
- **Uses** information effectively and ethically
- **Shares** information appropriately and lawfully.

By ensuring the above, the Federation will:

- Follow good practice in information handling and management
- Protect its children, parents/carers of children, staff and other individuals who each school holds personal information about
- Comply with current information laws and associated legislation relating to personal and non-personal information.

3. Scope

This policy will apply to:

- All information held and processed by Ashmore Park and Phoenix Nursery Schools Federation
- All individuals accessing information held by Ashmore Park and Phoenix Nursery Schools Federation - this includes staff, members of the Governing Board, other agencies, partners and individuals working with either school
- All systems within either school which holds and processes information.

This policy should be read in conjunction with the following Federation or Citywide policies:

- Data Protection Policy
- Wolverhampton Information Sharing Protocols and Agreements
- Freedom of Information Policy
- Information Security Policy
- Records Management Society of Great Britain - Retention Guidelines for Schools Schedule.

4. Responsibilities

The Headteacher, Mrs Susan Lacey and Ashmore Park and Phoenix Nursery Schools Federation's Governing Board is responsible for the implementation of this policy and the information governance framework outlined within it. Specific responsibilities are also outlined in the individual policies themselves.

5. The Information Governance Framework

The framework includes the following Information Governance (IG) areas:

- Data Protection
- Information Sharing
- Freedom of Information
- Information Security
- Records Management.

The Federation will ensure that for each of the IG areas the following will be in place:

1. Governance arrangements to ensure that all roles and responsibilities are clearly defined for all members of staff
2. Training and awareness – there will be a planned approach for training staff and for the roll out and implementation of all linked policies and procedures
3. Documented procedures to support the policies
 - These will specify any operational instructions to ensure compliance with legislation and standards.
4. Monitoring and compliance mechanisms to ensure that effective and timely reviews and monitoring activities are carried out.

6. Data Protection

Data Protection law establishes principles and rights in relation to the collection, use and storage of personal information relating to living individuals.

Ashmore Park and Phoenix Nursery Schools Federation's Data Protection Policy sets out the Federation's objectives and clarifies the roles and responsibilities within each school for data protection, these being:

- Meeting the requirements of current applicable data protection legislation – fair collection and legal use of information, safeguarding the rights of individuals, maintaining security of personal information – both physically and electronically, and ensuring the accuracy, quality and quantity of information both held and shared.
- Managerial arrangement – assigning responsibility for data protection, ensuring all staff are trained, dealing with enquiries and requests for information, and ensuring that processes are regularly reviewed.

A copy of our Data Protection Policy can be found on both school's website(s):

Ashmore Park Nursery School

- <https://www.ashmoreparknurseryschool.co.uk>
 - Governance
 - School Policies.

Phoenix Nursery School

- <https://www.phoenixnurseryschool.co.uk>
 - Governance
 - School Policies.

7. Information Sharing

It is recognised that effective information sharing is required to enable organisations to improve services, protect the public and respond to statutory requirements. In a school context, information sharing may be vital to safeguarding and promoting the welfare of children and young people.

At both schools in the Ashmore Park and Phoenix Nursery Schools Federation, information can be shared in two ways: in an informal, one to one basis, as and when a need arises or in a more formal way between two or more agencies, as part of a routine process.

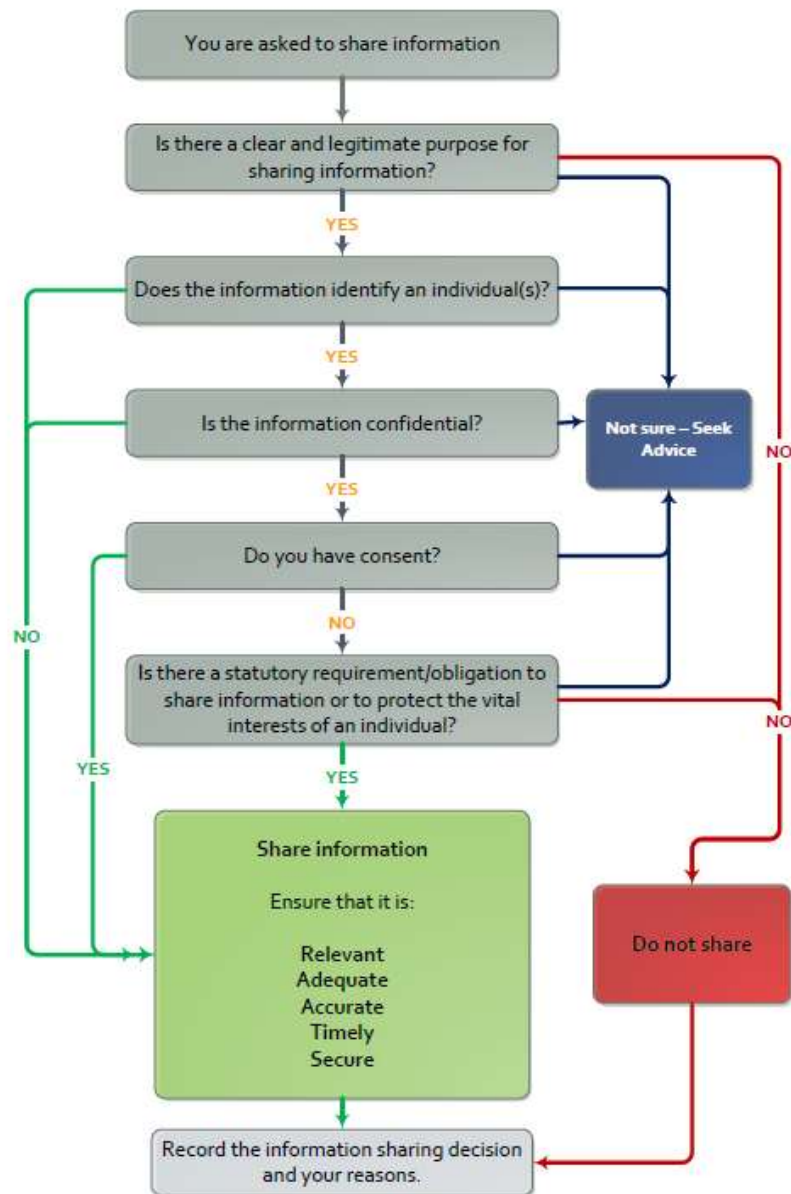
In both circumstances, either school will always ensure that information when shared, is in line with current data protection laws.

7.1 Ad-hoc Sharing of Information

Ashmore Park and Phoenix Nursery Schools Federation will always ensure that when sharing information, it is always:

1. **Relevant** – only information relevant to the purposes is shared with those requesting it
2. **Adequate** – information shared is adequate for its purpose to ensure that it can be understood and relied upon
3. **Accurate** – Information shared is accurate and up to date, and clearly distinguishes between fact, and opinion
4. **Timely** – information is shared in a timely manner in accordance with the circumstances it is being requested
5. **Secure** – information will be shared in an appropriate and secure way – by either phone, secure email, hard copy or face to face
6. **Recorded** – any information sharing decisions will be recorded, regardless of the outcome of the decision and held in accordance with the Federation's Records Management Society of Great Britain - Retention Guidelines for Schools Schedule.

Please refer to the HM Government Guidance flowchart below regarding ad-hoc information sharing:



7.2 Regular/Routine Information Sharing

Any regular sharing of personal information between either Ashmore Park Nursery School or Phoenix Nursery School, and other external agencies will be supported through the relevant information sharing agreement under Wolverhampton City’s - Three Tier Information Sharing Framework:

Tier 1 – Wolverhampton Overarching Information Sharing Protocol – this is a high-level policy document common to all organisations delivering services across Wolverhampton that describes a common set of principles and parameters to share information with each other.

Tier 2 – Information Community Agreement – this is a high-level agreement common to organisations delivering similar services across the City for the same purposes, objectives and scope - e.g. Education.

Tier 3 – Purposes Specific Information Sharing Agreement (PSISA) – these documents are aimed at an organisation’s ‘operational management/practitioner’ level and will define the relevant processes which support the information sharing between two or more agencies for a specified purpose. These documents will detail:

- What information is to be shared
- Why it is being shared (for what specific purposes)
- Who it is being shared with (between which agencies)
- When it is being shared (the times, the frequency etc.)
- How it is being shared (format).

The current Wolverhampton Information Sharing Framework and relevant templates can be found here:

[Wolverhampton Information Sharing](#)

8. Freedom of Information

The Freedom of Information Act 2000 (FOIA) provides a general right of access to all recorded information held by public authorities in England, Wales and Northern Ireland.

Ashmore Park and Phoenix Nursery Schools Federation, as a public authority, will be subject to the Act and as a result will have a process in place to handle these types of information requests. In general, the following will apply and each School:

- Will respond to all valid requests within the 20 - working day statutory timeframe. This timescale can be extended for example, if an exemption applies and we are considering whether or not disclosure would be in the public interest
- Will keep the requester informed of progress in the event of any possible delay or which exemption has been applied and why
- Will provide advice and assistance to persons making requests for information
- Reserves the right to refuse requests where the cost of providing the information would exceed the statutory cost limit. The limit is currently £450, which equates to 18 hour’s work at a statutory rate of £25 per hour
- Reserves the right to refuse requests that it considers vexatious or repeated
- Aims to publish as much information as it can; however, exemptions will be applied to ensure that information that is not suitable for publication is protected.

Ashmore Park and Phoenix Nursery Schools Federation will ensure that all members of staff who deal with information are aware of the FOI Act and what it means and are able to identify requests that fall under it. Requests will be dealt with in accordance to statutory procedures and will be responded to as a minimum, within 20 working days of either school receiving the request.

9. Information Security

The information that either Ashmore Park Nursery School or Phoenix Nursery School holds, processes, maintains and shares is an important asset that needs to be suitably protected.

Each school shall have the appropriate technical and operational measures in place to ensure the security of personal and commercially sensitive data to prevent unauthorised access, accidental loss or destruction of data – that may lead to an information incident.

Key Principles

- The Headteacher and the Governing Board at Ashmore Park and Phoenix Nursery Schools Federation have an essential role in maintaining sound information security and will ensure that the appropriate processes and procedures are in place, and regularly reviewed, and that all staff (existing or new) are adequately trained
- All staff are responsible for ensuring that information (personal or commercial) is kept securely and not disclosed to any unauthorised person. This applies to all staff who process personal data both on or off each school's premises
- All personal or commercially sensitive information is accessible only to those who need to use it and is held under controlled access. This applies to both hardcopy and electronically held information
- All applicable staff can identify potential information incidents or events and are aware of how these are reported, who they are reported to and when; should they occur.

9.1 Information Incidents

Information incidents can threaten the confidentiality, integrity and availability of the information that each school holds. Either school through this policy and supporting policies around information governance, and information security seeks to minimise the likelihood and frequency of such incidents.

Information incidents can include:

- **Criminal events** – theft of equipment, data or information, fraud or fraudulent activities; blagging offences – where information is obtained by deception; attempts (failed or successful) to gain access to data or information stored on systems (hacking)
- **Technical events** – changes to information held in a system without either schools' knowledge or consent (viruses, Trojans etc); use of unapproved or unlicensed software on each school's equipment; hardware/software failures
- **People events** – Accidental loss of equipment, data or information including mobile devices; failing to lock a screen when left unattended; sharing or transferring personal information with those not entitled to receive it; unauthorised access to information; disclosure of passwords – deliberately or unintentional
- **Physical events** – Unforeseen circumstances – fire and flood – loss of data as a result; unsecure premises; unlocked/unsecured workstations.

The Federation appropriates the services of an external partner for Information Technology (IT) through an annual Service Level Agreement (SLA); the Federation's current provider is eServices, a Wolverhampton City Council service provider. The Ashmore Park and Phoenix Nursery Schools Federation has adopted the Wolverhampton City Council's Information Security Policy, a copy of which can be provided on request from the Senior Administrator located in each school.

10. Records Management

Ashmore Park and Phoenix Nursery Schools Federation recognises that by efficiently managing its records, it will be able to comply with its legal and regulatory obligations and contribute to the effective management of both schools in the Federation. Records provide evidence for protecting the legal rights and interests of both schools' and its children, and for demonstrating performance and accountability.

Record Creation and Record Keeping Procedure

Each school will have in place record keeping systems (paper and electronic) that document activities and provide for quick and easy retrieval of information. The systems will take into account the legal and regulatory environment specific to each school.

Record Storage and Tracking

Record keeping systems across the Federation will be maintained to ensure that all records are properly stored and can easily be located, and retrieved.

Protection and Security

The Federation will maintain adequate levels of protection for records.

Retention and Disposal

The Federation will retain and dispose of records as part of a managed and documented process. This is increasingly important given the need for transparency and publication of data (linked to FOI), and responding to requests to access personal data (Subject Access rights under data protection law).

- There will be a defined process for the assessment and selection of records for disposal or preservation, and for documenting this work, which will be aligned to the Federation's Records Management Society of Great Britain - Retention Guidelines for Schools Schedule.

Responsibilities

Ashmore Park and Phoenix Nursery Schools Federation assigns specific responsibilities to all employees, where applicable, to ensure that:

- Actions and decisions taken in the course of their duties are properly recorded
- This policy and procedures for records management are followed consistently
- All information held is kept secure, and personal information is not disclosed deliberately or accidentally either orally or in writing to any unauthorised third party
- Records are identified for disposal in accordance with agreed policies and retention and disposal schedules
- Disposal procedures are implemented consistently.

11. Policy Review

A review of this policy will take place every two years, or sooner, in line with any new or changes in legislation, regulations or business practices.