

# Information Governance Framework Policy

Version 1: June 2018  
Date approved: June 2018  
Approved by: Standards, Staffing and Curriculum  
Next review: June 2019

## **Purpose**

This policy has been developed to support effective corporate management of Information Governance activities.

## **Principles**

1. All employees must comply with all Information Policies. This can be achieved by reading the information policies, attending relevant training and seeking clarification when unsure. This is to ensure that the Organisation remains compliant with Information law and provides assurance to the public over secure practices.
2. All employees must successfully complete relevant training in Information Governance key messages annually. This can be achieved by attending face-to-face training or eLearning appropriate to your role. This is to ensure that ECC can be certain that staff have been told the correct messages about how to handle data securely, and that we can evidence this to our regulators, partners and the public to give them confidence that we are suitable custodians of their data.
3. All managers must ensure that employees under their management are complying with our policies and any agreed exceptions. This is to ensure that ECC can be certain that staff have been told the correct messages about how to handle data securely, and that we can evidence this to our regulators, partners and the public to give them confidence that we are suitable custodians of their data.
4. We must ensure that the roles of Data Protection Officer (DPO) and Senior Information Risk Owner (SIRO) are in place.
5. We must ensure that an Information Governance Strategy is in place. A strategy should be approved by the Leadership Team and annual reviews should be made against its progress, reported to the Leadership Team and the Strategy should be amended if required. Strategies are only effective when they meet the demands of the law and enable employees to achieve compliance in a practical way. It is therefore vital that our strategy reflects the current legal requirements and helps guide employees in a clear way to meet those requirements. The Strategy must therefore be regularly reviewed to ensure it is fit for purpose.
6. We must undertake annual reviews of the IG Strategy, all Information Policies and Information Risks. Policy and Risk reviews should be undertaken annually and approved by the Leadership Team. Policies are only effective when they meet the demands of the law and enable employees to achieve compliance in a practical way. It is therefore vital that our policies reflect the current legal requirements and helps guide employees in a clear way to meet those requirements. Policy and Risk Management must therefore be regularly reviewed to ensure they are fit for purpose.
7. Any exceptions to Information Policies must be risk assessed and approved. Assessment of a request for an exception must be done by receiving an approval and acceptance of risk by the Senior Information Risk Owner (SIRO) or a delegated role. By recording approved exceptions in such a way as to be able to report on all current instances; showing who and what the exception is for, why it was granted, when the exception approval period comes to an end and who supported and approved the exception. We need to monitor and control the risks created by allowing exceptions to policy.

## Complaints

Complaints about the above policy should be made to the I.E.B/Chairperson of the Governing Body who will decide whether it is appropriate for the complaint to be dealt with in accordance with the school's complaint procedure.

Complaints which are not appropriate to be dealt with through the school's complaint procedure can be dealt with by the Information Commissioner. Contact details of both will be provided with the disclosure information.

## Breach Statement

Breaches of Information Policies will be investigated and may result in disciplinary action. Serious breaches of Policy may be considered gross misconduct and result in dismissal without notice, or legal action being taken against you.

## Contacts

If you have any queries or concerns regarding these policies/procedures then please contact Mr S Cox, Headteacher.



Signed: \_\_\_\_\_  
Head Teacher

Dated: 11<sup>th</sup> June 2018  
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Signed: \_\_\_\_\_  
Chair of Governors

Dated: 11<sup>th</sup> June 2018  
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**Updated June 2018**

