1.5 Information sharing

Policy statement

We recognise that parents have a right to know that information they share will be regarded as confidential as well as be informed about the circumstances, and reasons, when we are obliged to share information.

1.1 We record and share information about children and their families (data subjects) in line with the six principles of the General Data Protection Regulations (GDPR) (2018) which are further explained in our Privacy Notice that is given to parents at the point of registration The six principles state that personal data must be:

i. Processed fairly, lawfully and in a transparent manner in relation to the data subject.
ii. Collected for specified, explicit and legitimate purposes and not further processed for other purposes incompatible with those purposes.
iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which data is processed.
iv. Accurate and where necessary, kept up to date.
v. Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the data is processed.
vi. Processed in a way that ensures appropriate security of the persona data including protection against accidental loss, destruction or damage, using appropriate technical or organisational measures

1.2 We are obliged to share confidential information without authorisation from the person who provided it or to whom it relates if it is in the public interest. That is when:

i. it is to prevent a crime from being committed or intervene where one may have been, or to prevent harm to a child or adult; or
ii. not sharing it could be worse than the outcome of having shared it.

1.3 Group provision: The responsibility for decision-making should not rely solely on an individual, but should have the back-up of the management committee. The management team provide clear guidance, policy and procedures to ensure all staff and volunteers understand their information sharing

responsibilities and are able to respond in a timely, appropriate way to any safeguarding concerns. The three critical criteria are:

i. Where there is evidence that the child is suffering, or is at risk of suffering, significant harm.
ii. Where there is reasonable cause to believe that a child may be suffering, or is at risk of suffering, significant harm.
iii. To prevent significant harm arising to children and young people or adults, including the prevention, detection and prosecution of serious crime.

2 **Procedures**

Our procedure is based on the GDPR principles as listed above and the seven golden rules for sharing information in the Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers. We also follow the guidance on information sharing from the Local Safeguarding Children Board.

2.1 Remember that the General Data Protection Regulations 2018 and human rights law are not barriers to justified information sharing as per the Children Act 1989, but provide a framework to ensure that personal information about living individuals is shared appropriately.

- Our policy and procedures on information sharing provide guidance to appropriate sharing of information with external agencies.

2.2 Be open and honest. Explain to families how, when and why information will be shared about them and with whom. Seek consent to share information, unless it puts the child at risk or undermines a criminal investigation.

In our setting we ensure parents:

i. receive information about our information sharing policy when starting their child in the setting and they understand this will only be when it is a matter of safeguarding a child or vulnerable adult.;
ii. have information about our Safeguarding Children and Child Protection policy;
iii. have information about the circumstances when information will be shared with external agencies, for example, with regard to any special needs the child may have or transition to school.

2.3 Seek advice when there are doubts about possible significant harm to a child or others.

- Managers contact children's social care for advice where they have doubts or are unsure.

2.4 Share with informed consent where appropriate and, where possible, respect the wishes of those who do not consent to share confidential information. You may still share information without consent if, in your judgement, there is good reason to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be certain of the basis upon which you are doing so. Where you have consent, be

mindful that an individual might not expect information to be shared.

- Guidelines for consent are part of this procedure.

2.5 Consider the safety and welfare of the child when making a decision about sharing information – if there are concerns regarding 'significant harm' the child's well being and safety is paramount.
In our setting we:

- Record concerns and discuss these with the setting's *designated person* and/or *designated officer* from the management committee for child protection matters.
- Record decisions made and the reasons why information will be shared and to whom; and
- Follow the procedures for reporting concerns and record keeping.

2.6 Necessary, proportionate, relevant, adequate, accurate, timely and secure: Ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely..

- Our Child Protection procedure and Record Keeping procedure set out how and where information should be recorded and what information should be shared with another agency when making a referral.

2.7 Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

- Where information is shared, we record the reasons for doing so in the child's file; where it is decided that information is not to be shared that is recorded too

3 ***Consent***

3.1 When parents choose our setting for their child, they will share information about themselves and their families. This information is regarded as confidential. Parents have a right to be informed that we will seek their consent to share information in most cases, as well as the kinds of circumstances when we may not seek their consent, or may override their refusal to give consent. We inform them as follows:

- Our policies and procedures set out our responsibility regarding gaining consent to share information and when it may not be sought or overridden.
- We may cover this verbally when the child starts and include this in our prospectus.
- Parents are asked to give written consent to share information about any additional needs their child may have, or to pass on child development summaries, to the next provider/school.

3.2 We consider the following questions when we need to share:

- Is there legitimate purpose to sharing the information?
- Does the information enable the person to be identified?

- Is the information confidential?
- If the information is confidential, do you have consent to share?
- Is there a statutory duty or court order to share information?
- If consent is refused, or there are good reasons not to seek consent, is there sufficient public interest to share information?
- If the decision is to share, are you sharing the right information in the right way?
- Have you properly recorded your decision?

3.3 Consent must be freely given and informed - that is the person giving consent needs to understand why information will be shared, what will be shared, who will see information, the purpose of sharing it and the implications for them of sharing that information

3.4 Consent may be explicit, verbally but preferably in writing, or implicit, implied if the context is such that sharing information is an intrinsic part of our service or it has been explained and agreed at the outset.

3.5 Consent can be withdrawn at any time.

3.6 We explain our Information Sharing Policy to parents.

4 **Separated parents**

4.1 Consent to share need only be sought from one parent. Where parents are separated, this would normally be the parent with whom the child resides. Where there is a dispute, we will consider this carefully.

4.2 Where the child is looked after, we may also need to consult the Local Authority, as 'corporate parent' before information is shared.

All the undertakings above are subject to the paramount commitment of the setting, which is to the safety and well-being of the child. Please also see our Safeguarding Children and Child Protection policy.

Legal framework

- General Data Protection Regulations (GDPR) (2018)
- Human Rights Act (1998)

This policy was adopted at a meeting of	St Christopher's Playgroup	name of setting
Held on	September 2026	(date)
Date to be reviewed	September 2027	(date)
Signed on behalf of the management committee	KJCookes	
Name of signatory	Karen Cookes	
Role of signatory (e.g. chair)	Playgroup Manager	