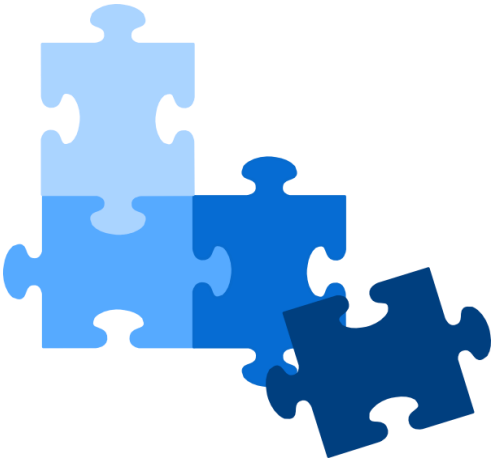


JIGSAW LEARNING TRUST

INFORMATION SHARING PROTOCOL

Fulwell Infant School Academy

OUSTON PRIMARY SCHOOL

September 2026

Information Sharing Protocol for Jigsaw Learning Trust

Purpose and Aim

Jigsaw Learning Trust's whole-school Information Sharing Protocol aims to provide clear direction to staff and others about expected codes of behaviour in the sharing of information of a confidential nature. The protocol also aims to make explicit the school's commitment to the development of good practice and sound procedures to keep children and adults safe in our school. This is inclusive of the expectations from the UK GDPR and Data Protection Act 2018.

Information Sharing

Information sharing is vital to safeguarding and promoting the welfare of children and young people. A key factor identified in many serious case reviews (SCR's) has been a failure by practitioners to record information, to share it, to understand its significance and then take appropriate action. This protocol aims to set out clear standards required by everyone.

Staff should ensure that information sharing decisions are made in accordance with the current statutory guidance on Information Sharing and Keeping Children Safe in Education 2026.

The seven golden rules of information sharing

Jigsaw Learning Trust follows the Government's principles for information sharing. Staff should apply these principles alongside UK GDPR, the Data Protection Act 2018, current safeguarding guidance and the Trust's data protection arrangements:

1. Data protection legislation does not prevent information sharing where there is a lawful basis to do so. The law provides a framework for sharing personal information appropriately and securely.

2. Be open and honest with the child, young person and/or their family where appropriate about why information may be shared, what may be shared and with whom, unless it would be unsafe or inappropriate to do so.

3. Seek advice if you are in any doubt about information sharing. Advice should be sought from the DSL, senior leader or appropriate data protection lead as applicable, without disclosing the identity of the individual where possible.

4. Consent is not always required. Where consent is appropriate, it should be sought and any wishes expressed should be considered. However, information may be shared without consent where there is another lawful basis for doing so, including where sharing is necessary to safeguard and promote the welfare of a child.

5. Consider safety and wellbeing. Information sharing decisions should be based on the safety and wellbeing of the child and others who may be affected.

6. Necessary, proportionate, relevant, accurate, timely and secure. Share only the information that is necessary for the purpose, with those who need it, ensuring that it is accurate and up to date, shared in a timely manner and transferred securely.

7. Keep a record of the decision and the reasons for it, whether the decision is to share information or not. Where information is shared, record what was shared, with whom, when and for what purpose.

Legislation guidelines

The Education Act 2002, section 175 (for maintained schools and settings), the Education (Independent School Standards) Regulation 2014 (for Academies/Free Schools) and the Education non maintained Special schools (England) Regulation 2015 sets out the need for all schools/settings to have appropriate safeguarding arrangements in place.
The legislation also sets out the duty to work co-operatively with external organisations. Although the legislation for Data Protection and Human Rights is in place, the learning from serious case reviews is clear, 'where there are safeguarding concerns about a child. A concern could be based on an established risk (e.g. where there is evidence that a child has suffered harm) or a suspected or potential risk (e.g. where it is reasonable for a practitioner to believe that information sharing is necessary to protect a child from harm that may happen without intervention). It may be that the risk of harm to a child can

only be identified and understood through the early sharing of concerns between practitioners and agencies or organisations who may hold relevant information about the child and can support action to safeguard the child. (Information Sharing, 2024) and therefore both internal and external procedures should always be in place for sharing information.

Section 10 and 14B of the Children Act 2004, is explicit in highlighting the need for all agencies to share information with each other, the Local Authority and Safeguarding Partners.

Information Sharing Duty: From September 2026, relevant organisations are subject to statutory information-sharing requirements for the purposes of safeguarding and promoting the welfare of children, where the conditions for the duty are met. Staff should cooperate with appropriate requests for information and share relevant information lawfully, proportionately and securely in accordance with current statutory guidance and this protocol.

UK GDPR and Data Protection Act 2018 states that if you are creating records about the children and/or adults that take part in your services or activities, you need to make sure they understand what records you hold, why you need to hold them and who you might share their information with (for example as part of a multi-agency child protection team) (Information Commissioner's Office, 2017(a) and 2017(b)). If you are keeping records for child protection reasons, you don't always need to gain consent from the adults and/or children concerned. Therefore information may still be held and retained as long as there is an agreed purpose for it and where applicable, consent has been given.

Information sharing internally within the school/setting

Sharing information either verbally, electronically or in paper format between members of your workforce requires clear direction in terms of consistency and safe practice.

All staff should be fully aware of the school/setting's expectations when sharing information about children, adults and their families. Any information that is shared could be requested by the individual or another agency in the future.

Therefore best practice would recommend that information is accurate, factual and does not include personal interpretation or recommendation. Any recordings that are made that are not part of the central, secure recording process must

not identify an individual child, adult or their family. In these circumstances the use of initials and year group would be appropriate.

Information sharing externally to parents and multi-agency partners

The same principles of sharing information internally, will apply to those members of staff who due to their role and responsibility have permission to share information with parents and multi-agency partners.

In addition to this, best practice would recommend that all conversations are recorded and held centrally and securely. Information that is shared externally either electronically or in paper format needs to be sent in a secure method. For example information that is restricted should be sent password protected (electronically) or recorded delivery (paper format) so that it can be tracked and accounted for. Each school or setting should have clear and consistent protocols for this discharge.

Information sharing for child protection

Information Sharing is necessary in the safeguarding and protection of children and all staff within school must follow the school's Child Protection Policy where there is any evidence that a child is at risk of significant harm, through observation or disclosure from the child.

Significant harm is defined in The Children's Act 1989 as the Ill-treatment (including sexual abuse and physical abuse) or the impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child.

Note: harm now includes the impairment of a child's health or development as a result of witnessing the ill treatment of another person.

(Adoption and Children Act 2002)

Internal reporting for child protection

All staff must report any safeguarding concern about a child to the Designated Safeguarding Lead (DSL) as soon as possible. Staff should not delay reporting a concern because they are unsure whether it meets the threshold for significant harm. The DSL will consider the concern and determine the appropriate action, including whether information should be shared with other agencies.

The Designated Safeguarding Leads are Wendy Angus (Fulwell) and Louise Lavelle (Ouston)

Information sharing is also necessary where there are concerns around the behaviour or practice of adults within the setting either employed staff, contractors or visitors. If there are any issues raised about the conduct of any adult on site either towards a child or another adult this must be reported directly to the Head Teacher/Principal (See Confidential Reporting/Whistleblowing Policy)

External reporting for child protection

The role of the DSL is to consider the information shared and assess the level of concern and the appropriate response. Where a child is considered to be at risk of harm, or where information indicates that statutory safeguarding intervention may be required, the DSL will make an external referral using the appropriate local authority safeguarding referral route. The referral will normally be made verbally where appropriate and followed up in writing. The DSL may also involve the police where the concern is of a criminal nature, following local procedures.

Where a child is not considered to require statutory safeguarding intervention but may benefit from additional help or support, the DSL may consider an Early Help or other appropriate support referral, in accordance with local procedures and the circumstances of the case.

Under Keeping Children Safe in Education 2026 it states that if, in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.

External Information Sharing for Allegations/Complaints

The role of the Head Teacher/Principal is to ensure that any allegation or concern about the behaviour of an adult working with children is reported promptly through the appropriate safeguarding allegations procedure. Where a child or adult makes an allegation of harm by another adult, the Head Teacher/Principal must contact the Local Authority Designated Officer (LADO) for advice and follow the Trust's Allegation Management Policy and local procedures.

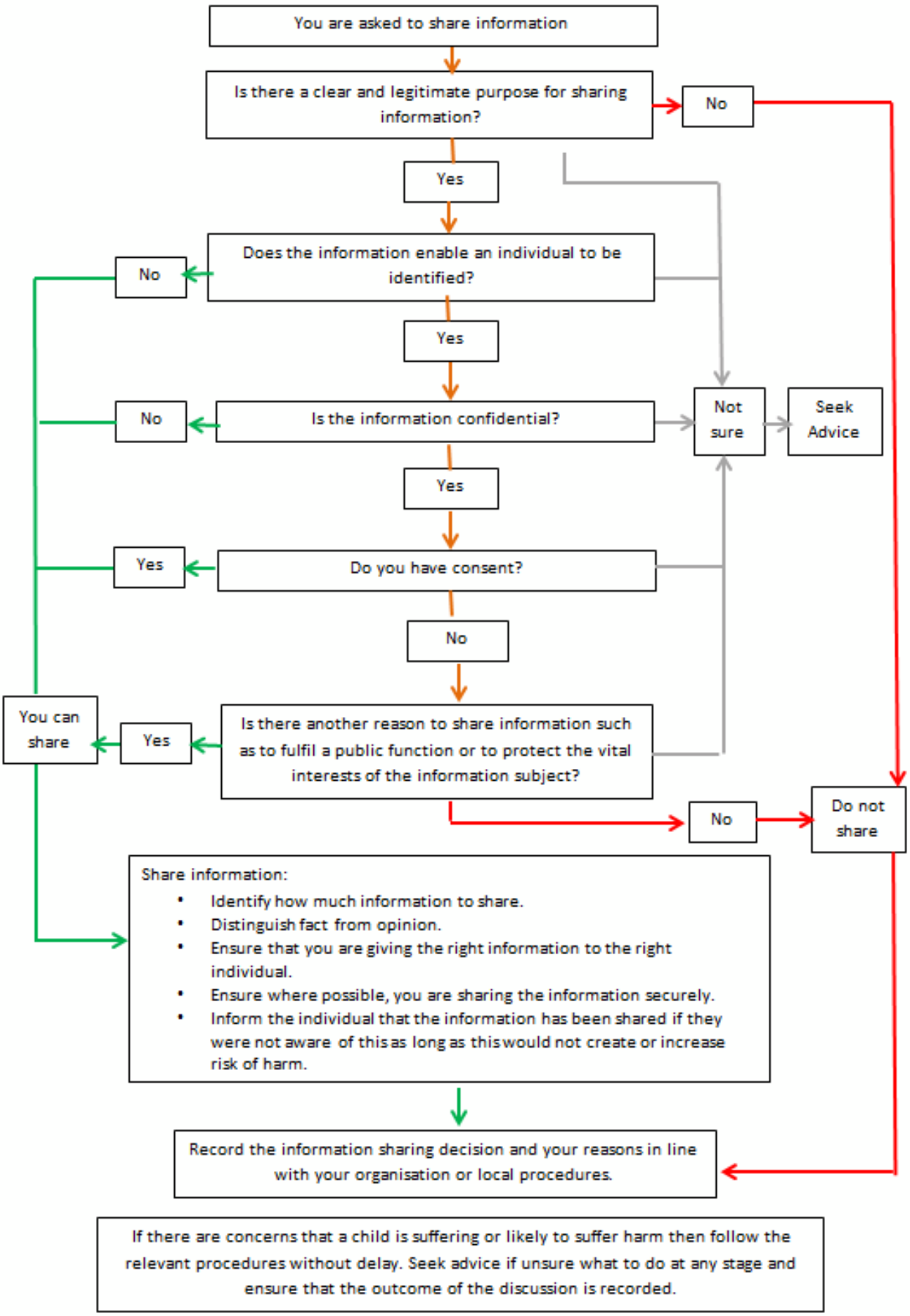
If the disclosure or allegation is made against the Head Teacher/CEO, it must be reported to the appropriate person in accordance with the Trust's Allegation

Management Policy and local safeguarding procedures, including the Chair of Trustees where appropriate, who will ensure that the LADO is contacted.

Any concerns about the school/setting as an organisation must be dealt with through the appropriate local authority, safeguarding and regulatory procedures.

In addition, Safeguarding Partners can require an individual or body to comply with a request for information, as outlined in Section 14B, Children Act 2004. This can only take place when the information requested is for the purpose of enabling or assisting the Safeguarding Partners to perform its functions.

The following flow chart (page 12 information sharing) can support you in understanding when and how to share information:


You are asked to share information
Is there a clear and legitimate purpose for sharing information?
No
Yes
Does the information enable an individual to be identified?
No
Yes
Is the information confidential?
No
Not sure
Seek Advice
Yes
Do you have consent?
Yes
No
Is there another reason to share information such as to fulfil a public function or to protect the vital interests of the information subject?
Yes
You can share
No
Do not share
Share information:
Identify how much information to share.
Distinguish fact from opinion.
Ensure that you are giving the right information to the right individual.
Ensure where possible, you are sharing the information securely.
Inform the individual that the information has been shared if they were not aware of this as long as this would not create or increase risk of harm.
Record the information sharing decision and your reasons in line with your organisation or local procedures.
If there are concerns that a child is suffering or likely to suffer harm then follow the relevant procedures without delay. Seek advice if unsure what to do at any stage and ensure that the outcome of the discussion is recorded.

Conclusion

Information regarding children who are vulnerable and their families will have to be recorded and stored in the best interests of those individuals. Where appropriate and safe to do so, children and adults should be informed about how their information will be used and shared. Consent should be sought where it is the appropriate basis for sharing, but it is not required in every safeguarding circumstance. Information may be recorded, retained and shared without consent where there is a lawful basis and this is necessary to safeguard and promote the welfare of a child. In all circumstances information should be treated confidentially, recorded factually and accurately and stored for an agreed period of time (see retention schedule). Parents and children have a right to know and understand what information is recorded about them and why and may request to see it, subject to applicable exemptions and safeguarding considerations. Any information that is shared must be appropriately redacted and pertain only to those individuals of whom the request has been made.

Please note that this protocol should be read in conjunction and be consistent with the current:

Child Protection Policy

Looked After Children Policy

Allegation Management Policy

Complaints Policy

Whistleblowing Policy

Intimate Care Policy

Medication Policy

Use of Reasonable Force Policy

Record Retention Policy

Children Act, (2004)

Working Together to Safeguard Children (2026)

Keeping Children Safe in Education (September 2026)

Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)

UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018