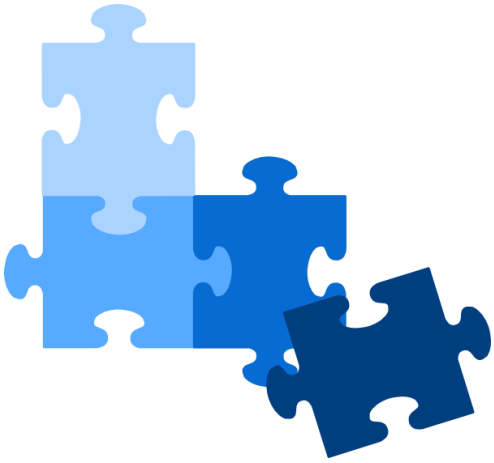


JIGSAW LEARNING TRUST

INFORMATION SHARING PROTOCOL

Date of approval: **December 2025** (Updated as/when required)

V4

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 Data Protection Act 2018 and General Data Protection Regulations 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.

The seven golden rules of information sharing

Jigsaw Learning Trust follows the Government golden rules of information sharing and these are embedded into everyday practice:

1. **Remember that the Data Protection Act is not a barrier to sharing information** but provides a framework to ensure that personal information about living persons is shared appropriately.
2. **Be open and honest** with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could

be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.

3. **Seek advice** if you are in any doubt, without disclosing the identity of the person where possible.

4. **Share with 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, that lack of consent can be overridden in the public interest. You will need to base your judgement on the facts of the case.

5. **Consider safety and well-being**: Base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.

6. **Necessary, proportionate, relevant, 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 people who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely.

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.

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 the LSCB.

The General Data Protection Regulations, 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

At any point, if staff believe, in their professional opinion, a child is at risk of significant harm they must inform the Designated Safeguarding Lead (s) immediately.

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)

The Headteacher/CEO is Wendy Angus

External reporting for child protection

The role of the DSL is to make a decision based on the information shared about the risk of harm to the child. If the child is deemed to be at risk of significant harm from a person who has care, custody or control of them then an external referral will be made via your own local authority's referral routes. Firstly this will be verbally, followed up in writing. The DSL may also wish to involve the police if the concern is of a criminal nature in which case they would follow your local procedures for contacting police.

If the child is not deemed at risk of significant harm but is in need of support and help a referral to Early Help can be made with consent and agreement from parents. This involves help and support without the need for statutory intervention.

Under Keeping Children Safe in Education 2024 it states, '*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

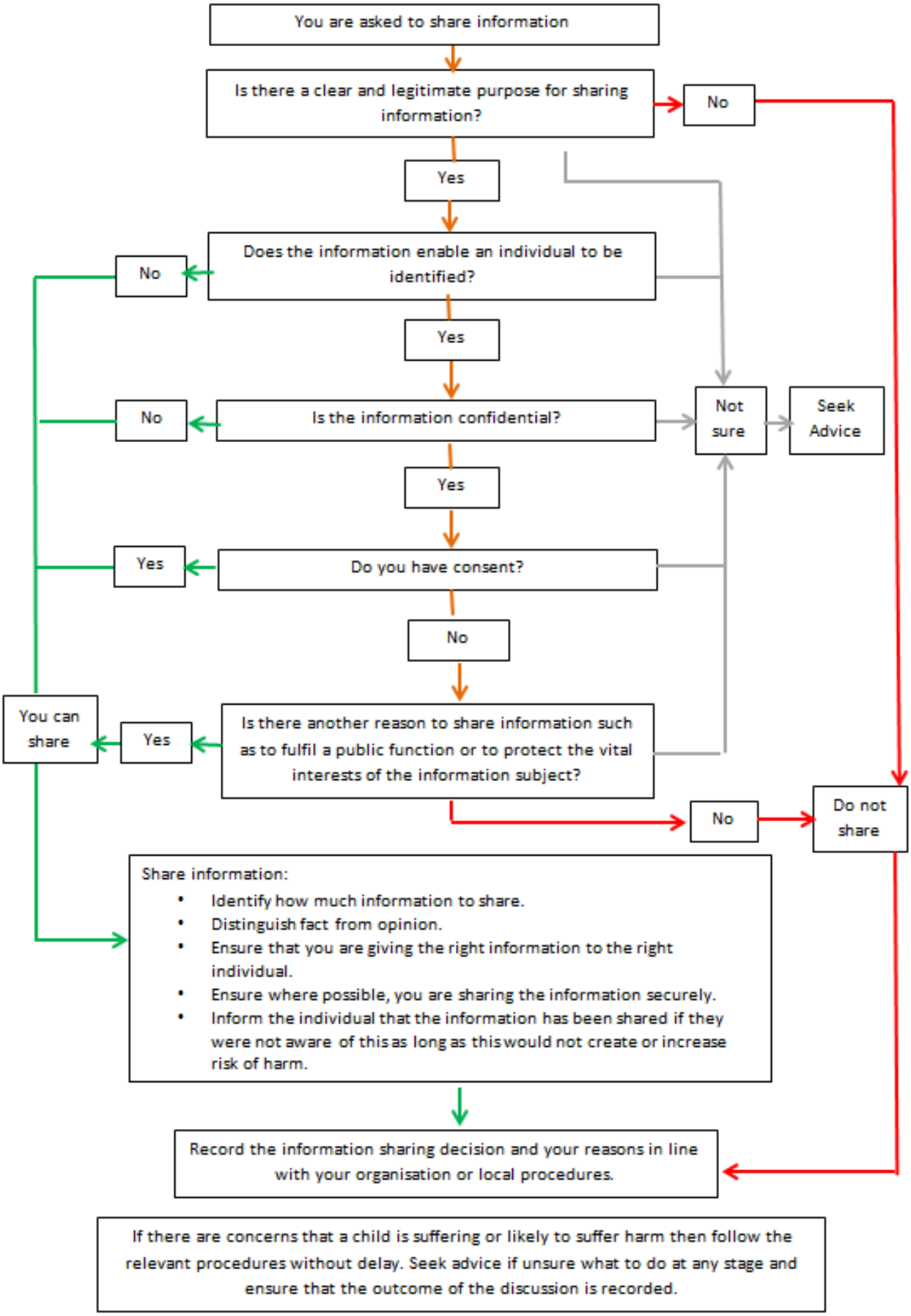
The role of the Head Teacher/Principal is to make a decision about the risk of harm towards a child from another adult employed, working or visiting the school. If a child or adult discloses harm by another adult then the Head Teacher must contact the Designated Officer, within the LA for immediate advice.

If the disclosure/allegation is made against the Head Teacher/CEO then it must be reported to the Chair of Governors who will contact the (LA) Designated Officer.

If the disclosure/allegation is made against the school/setting/regime the Local Authority and OFSTED should be notified.

In addition, the LSCB 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 LSCB 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 possible and at every opportunity children and adults should be informed of this and their consent gained and recorded alongside their consent to share this information with others. In some circumstances e.g. child protection, consent may not be given but the statutory nature of the case requires that it is recorded. 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. 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 (2023)

Keeping Children Safe in Education (September 2025)

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

Data Protection Act 2018, NDPR 2018