



INFORMATION SHARING POLICY

Last reviewed:	July 2025
Next review due:	July 2026

Statement of intent

The Little Firefly recognises that parents, staff and children have a right to know that the information they share with us will be regarded as confidential, as well as being informed about circumstances and the reasons why, we are obliged to share such information.

This policy should be read in conjunction with the following policies and procedures:

- Privacy Policy
- Safeguarding Policy

This policy applies to all children, staff and any visitors to our setting.

Our responsibilities

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 to do so. Such situations may include (amongst others):

- When it is to prevent a crime from being committed or to intervene where one may have been;
- To prevent harm (physically or emotionally) to a child or adult;
- When not sharing the information could be worse than the outcome of sharing it.

At The Little Firefly the decision as to whether information should be shared is never made by an individual, instead such decisions are made as a management team following the following critical criteria:

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

Procedure

Our information sharing procedure is based on the seven golden rules for sharing information as advised by the Department for Education.

The seven golden rules for sharing information (including personal information):

- 1. All children have a right to be protected from abuse and neglect. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them.** The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.
- 2. When you have a safeguarding concern, wherever it is practicable and safe to do so, engage with the child and/or their carer(s), and explain who you intend to share information with, what information you will be sharing and why.** You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g. because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).
- 3. You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.
- 4. Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. Instead, find out who in your organisation/agency can provide advice about what information to share and with whom. This may be your manager/supervisor, the designated safeguarding children professional, the data protection/information governance lead (e.g., Data Protection Officer), Caldicott Guardian, or relevant policy or legal team. If you work for a small charity or voluntary organisation, follow the NSPCC's safeguarding guidance.
- 5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to protect the identities of any individuals (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.**
- 6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services.** Sharing information with a third party rarely requires you to share an entire record or case-file – you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.
- 7. Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

The management team responsible for making decisions regarding information sharing will seek advice from children's services for the relevant setting (Buckinghamshire County Council for

Upton, Oxfordshire County Council for Kingston Blount) where they have doubts or are unsure whether information should be shared. In all cases the management team will:

- Record concerns;
 - Consider the following questions when we need to share information:
 - Is there a 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 we have consent to share?
 - Is there a statutory duty or court order that requires us to share the information?
 - If consent is refused, or there are good reasons for not seeking consent (i.e. the child is at risk of significant harm), is there sufficient public interest for us to share information?
 - If the decision is to share, are we sharing the right information in the right way?
 - Have we properly recorded our decision?
- Record decisions made along with the reasons why information will be shared and to whom and at all times follow the procedures for reporting concerns and record keeping as outlined in our Safeguarding Policy. This includes how and where information should be recorded and what should be shared with another agency when making a referral;
- Record the decision whether or not to share in the child's file.

Consent

Parents have a right to be informed that their consent to share information will be sought in most cases, as well as the kinds of circumstances when their consent may not be sought, or their refusal to give consent may be overridden. We do this as follows:

- Providing a copy of our Information Sharing policy which set out our responsibility regarding gaining consent to share information and when it may be sought or overridden
- Providing a copy of our Safeguarding and Confidentiality policies which include the procedures for reporting concerns and record keeping.
- Ensuring parents have information about the other circumstances when information will be shared with external agencies such as transition to school or with regard to any special educational needs or disabilities that the child may have.
- Requesting parents to provide written consent to share information about their child with regards to special educational needs and/or disabilities with relevant agencies.

All undertakings are subject to the paramount commitment of The Little Firefly, which is the safety and wellbeing of the children in our setting.

Policies, procedures and risk assessments referred to in this document:

- Safeguarding Policy
- Data Protection Policy
- Privacy Policy

External references:

- [DfE non statutory information sharing advice for practitioners providing safeguarding services for children, young people, parents and carers](#)