

# **Information Sharing Principles**

JW - 14.12.21

Information sharing occurs on a daily basis in schools. It may be information about pupils, staff, parents or others. Every member of school staff, and many volunteers, have access to a lot of information about different individuals.

For all of us, we have to bear in mind the basis that we share and discuss information. UK GDPR and Data Protection is only part of the story. Safeguarding, contractual responsibilities, statutory responsibilities and daily expectations are all other factors why we share information.

Schools have many policies that deal with all aspects of school life. Every member of a school staff needs to consider some key elements when they are sharing information.

#### The purpose of sharing

Sharing information can be as simple as the word of a parent in the playground, by email or by telephone. It may be something as simple as "yes, Tom had a good day" or "Kirpal enjoyed the music lesson". It might be far more intricate and complicated. It could be information about a child's injury at school. A health issue. Concern about behaviour, bullying or SEN. All of these are examples of information sharing.

#### Who are we sharing with?

Who is the recipient of the information? Do they have a legitimate right to know the information? Is it a parent or someone with Parental Responsibility? Is it an external partner agency like the police or social care? Is it an extended family member? Or even a sibling?

Thinking about who the recipient is, and what is their legal basis for requesting the information, needs to be at the forefront of all school staff's consideration.

### What data is to be shared?

Some information is more sensitive, and sharing health information or safeguarding information must be done with great care. However, even some basic information about pupils or staff needs to be thought through carefully. When you are asked to share information, you need to consider what is the least amount of information that can be shared to fulfil the objective. Data minimisation is a key pillar of the UK GDPR – keep it as brief as possible.

### Data quality, accuracy, relevance and usability

What information is being given? Is it an opinion or is it fact? If it is reporting information that is not known directly by you, what is the source of it? Are you sure it is accurate? Are you providing information that was given to school for one reason, but the requester wants it for a different purpose? If so, is it right to share that information?

## Data security

How is the information to be shared? Face-to-face, is it a safe place to have a confidential conversation? Are any other people around? Should confidential information be sent by email? What about secure delivery, or password protection? If being shared with an outside agency, what protections are in place? If information is going out by hard copy post, what checks and balances are

there to make sure that the right recipients get the right report? (This is a common source of a data breach).

If information is going by pupil post, are there any risks if the bag went missing on the way home?

Are there measures in school to ensure that information is checked on an annual basis and reminders are sent through the academic year for parents and carers to update contact information?

#### Record-keeping

It will be impossible to keep track of every piece of information that is shared in the school. A school would grind to a halt within half an hour! However, sensitive information or safeguarding or health data being shared should be recorded. This might be as simple as keeping a note on an email about what was sent and why.

### Individual's rights

All staff members should be aware that there are Data Subject Access processes that individuals can use. Likewise, there is a complaints process that can be accessed and people should be directed to the relevant pages on the school website or in the policies.