

Three Counties Academy Trust



Sharing Safeguarding Information Policy

#SG50

Last amended 30th August 2026 (v1.0)

Policy lifespan: 3 years. Subject to annual compliance check. Next full review 31st August 2029.

Version history

Date	Version	Details	Actioned by	PDF to Websites	Word to Governor Hub
30.08.26	1.0	Formatted to house style and checked against model for updates	MF	✓	✓

Contents:

Version history

Policy abbreviations and acronyms

Statement of intent

Member, Trustee, Local Governor and Staff Summary

Parent Summary

1. Legal framework
2. Roles and responsibilities
3. Systems for sharing information to safeguard pupils
4. Purpose of sharing information
5. Data protection principles and lawful basis
6. Assessing risks
7. Sharing information in an emergency

Monitoring and review

Appendices

A. Staff Information Sharing Flowchart

Trust Glossary

Policy Abbreviations and Acronyms

CEO	Chief Executive Officer
CPD	Continuing Professional Development
CYPMHS	Children and Young People's Mental Health Services
DfE	Department for Education
DPIA	Data Protection Impact Assessment
DPO	Data Protection Officer
DSL	Designated Safeguarding Lead
FGM	Female Genital Mutilation
ICO	Information Commissioner's Office
KCSIE	Keeping Children Safe in Education
SAR	Subject Access Request
TCAT	Three Counties Academy Trust
UK GDPR	UK General Data Protection Regulation

NB. Where the term “parent” or “parents” is used this includes those who act as carers or have parental responsibility.

NB. Staff roles noted within this policy may also include those staff performing that role in an ‘Acting’ capacity.

Statement of intent

Three Counties Academy Trust (TCAT) and our schools recognise the importance of timely and effective information sharing when safeguarding and promoting the welfare of pupils. It is important that TCAT and our schools are clear on when information should be shared and how staff members should do this whilst understanding that the Data Protection Act 2018 and UK GDPR are not barriers to the sharing of information for the purposes of keeping children safe.

TCAT has implemented this policy in order to ensure missed opportunities to take action to protect pupils do not occur and to ensure that staff members understand the vital importance of information sharing and do not hesitate to share safeguarding information when a pupil is at risk.

This policy will underpin TCAT and our schools duty to share safeguarding information which:

- Prevents harm
- Promotes the welfare of pupils
- Identifies risk in order to prevent harm

Member, Trustee, Local Governor and Staff Summary

Key Purpose

- Safeguarding information must be shared promptly to protect pupils from harm
- Data protection law supports appropriate safeguarding information sharing

Governance and Leadership

- Trustees and Local Governors oversee implementation and effectiveness
- Leaders must ensure robust systems, training and compliance

Staff Responsibilities

- Report safeguarding concerns without delay
- Follow safeguarding and data protection requirements
- Seek advice from DSL, CFO or DPO when needed

Information Sharing

- Share information that is necessary, proportionate, accurate and timely
- Only share with those who need to know
- Follow the Think Check Share approach

Data Protection

- Identify an appropriate lawful basis before sharing information
- Consent is not usually required where safeguarding concerns exist
- Record decisions and reasons for sharing information

Emergency Situations

- Protecting the child takes priority during emergencies
- Share information immediately where necessary to reduce risk
- Record actions taken as soon as possible afterwards

Assurance and Review

- Regular safeguarding and data protection training is required
- Information sharing arrangements are reviewed to remain effective and compliant

Parent Summary

How TCAT Schools Keep Children Safe

- Information may be shared when it is necessary to protect a child from harm
- Schools have systems that allow safeguarding concerns to be reported and acted upon quickly
- Staff receive training on recognising concerns and sharing information appropriately
- Safeguarding decisions always focus on the safety and wellbeing of pupils

What Parents Need to Know

- Parents will normally be involved when safeguarding information is shared about their child
- The school will be open and honest about why information is being shared where it is safe and appropriate to do so
- Consent is not always required if information needs to be shared to protect a child from harm
- Parents should work with the school when safeguarding concerns arise

How Information is Shared

- Information is only shared with people who need to know
- Information should be necessary, proportionate, accurate and shared securely
- Schools use safeguarding systems and procedures to protect personal information
- Data protection law supports appropriate safeguarding information sharing

Emergencies and Safety

- Information will be shared quickly if a child is at immediate risk of harm
- Protecting a child is always the priority in an emergency
- Records are kept of significant safeguarding information sharing decisions
- Staff know how to report urgent concerns and who to report them to

How Parents Can Help

- Report concerns about your child or another child to the school as soon as possible
- Provide relevant information that may help keep children safe
- Maintain positive communication with the school if safeguarding concerns arise
- Ask for support or advice if you are worried about the safety or wellbeing of a child

1. Legal framework

This policy has due regard to all relevant legislation and statutory guidance including, but not limited to, the following:

- [ICO 'A 10 step guide to sharing information to safeguard children'](#)
- [DfE 'Keeping children safe in education' \(KCSIE\)](#)
- [DfE 'Information sharing duty'](#)
- [UK GDPR](#)
- [Data Protection Act 2018](#)
- [DfE 'Working Together to Safeguard Children'](#)

Where legislation has been passed or updated during the shelf life of this policy, we will always apply the latest version available irrespective of the version quoted here.

This policy operates in conjunction with the following policies:

- Data Protection Impact Assessment (DPIA)
- Subject Access Request (SAR) Policy (FI9)
- Data Protection Policy (FI20)
- Whistleblowing Policy and Procedure (HR25)
- Child Protection and Safeguarding Policy and Procedures (SG1)
- Reporting Low-Level Safeguarding Concerns Policy (SG11)
- Pupil Confidentiality Policy (SG28)

Central TCAT policies have the policy number identified, e.g. "SG1". Where no policy number is identified this indicates the policy is a school specific policy available from an individual TCAT school's website.

2. Roles and responsibilities

The CEO will be responsible for:

- Implementing and reviewing this policy across TCAT

Executive Headteachers, Headteachers and where delegated, Heads of School will be responsible for:

- The implementation of this policy within their schools
- Ensuring staff receive appropriate and regular data protection and safeguarding training as required and at least annually
- Implementing systems which enable staff to share safeguarding information without fear of breaking data protection law

The Trust Board and where delegated Local Governing Bodies will be responsible for:

- Keeping this policy under review and overseeing its implementation in liaison with the CEO, Executive Headteachers, Headteachers, Heads of School, the DPO and DSLs
- Holding TCAT and TCAT schools to account for their systems and processes for sharing safeguarding information and assessing their effectiveness
- Ensuring staff have due regard to the relevant data protection principles enabling them to share and withhold personal information for safeguarding purposes

DSLs will be responsible for:

- Being the first point of contact when safeguarding concerns and information needs to be reported within their school
- Providing guidance and support to staff members regarding the recognition and reporting of safeguarding concerns and information
- Quality assuring training provision to ensure it is high quality and up to date
- Being confident of processing conditions that enable them to store and share information required to carry out their safeguarding role
- Undertaking in-depth training and CPD

The Chief Finance Officer in consultation with the DPO will be responsible for:

- Overseeing the implementation of DPIAs
- Assessing risks associated with sharing safeguarding information in liaison with the Trust Education Welfare and Safeguarding Support Officer and DSLs
- Providing guidance and support to staff members regarding data protection legislation and sharing information appropriately
- Making it clear to staff members that sharing information relating to pupils at risk of harm is not prevented by data protection law

All staff will be responsible for:

- Reporting any known safeguarding information
- Making themselves aware of data protection law and how it applies to the sharing of information relating to safeguarding
- Participating in training and keeping up to date with relevant developments
- Seeking advice from their DSL, CFO and DPO as appropriate
- Reading any notices or emails regarding the sharing of safeguarding information and asking any questions as appropriate
- Being alert to safeguarding concerns and indicators of abuse and neglect
- Carrying forward disclosures of safeguarding issues by pupils to their DSL

Parents will be responsible for:

- Cooperating with TCAT and their school where safeguarding information regarding their child is being shared
- Reporting concerns regarding their child's wellbeing to their school and that which concerns other pupils' wellbeing if appropriate

3. Systems for sharing information to safeguard pupils

TCAT and our schools will adopt strong governance, policies and procedures to keep our systems for sharing safeguarding information under review.

Where a staff member notices a concerning incident or pattern of behaviour, they will understand that they need to report their concerns at the earliest opportunity. Staff will be trained and supported on how to do this appropriately in order for concerns to be addressed swiftly.

Training will include that which covers safeguarding and data protection to the appropriate level for their role within their school. Regular refresher sessions of such training will be provided.

TCAT and our schools will adopt policies and procedures which enable information sharing both on a routine basis and as a one-off.

The rules and procedures for routine information sharing will be agreed on, and the associated risks will be assessed via a Data Protection Impact Assessment (DPIA). A data sharing agreement will also be established.

For one-off information sharing, decisions will be made on what is required to safeguard pupils based on circumstances at the time whilst considering what is fair and appropriate. TCAT and our schools will plan ahead to incorporate systems for one-off information sharing and will clearly communicate these systems to staff members.

Where TCAT or a TCAT school is required to share information in one-off situations that are not covered by routine arrangements or agreements, the risks of sharing that information will be assessed and plans will be made in advance to cover such situations.

In the event where the sharing of information needs to be done urgently, e.g. in the event of a safeguarding emergency, TCAT or the TCAT school will assess the risk and take action based on what is necessary and appropriate in accordance with the Sharing information in an emergency section of this policy.

TCAT schools' will incorporate an online safeguarding system which enables concerns to be shared with the DSL.

Parents will be involved in the process of sharing safeguarding information unless disclosing information to parents could put a pupil at greater risk, e.g. concerns relating to domestic abuse.

TCAT and our schools will be open and honest with the pupil concerned, and their parents where appropriate, about why, what, how, and with whom the information will be shared. TCAT and our schools will not be required to seek consent to share information if it means protecting the safety of a pupil; however, it will abide by the legal bases for processing data in accordance with the Data protection principles and lawful basis section of this policy.

Each TCAT school's systems for sharing safeguarding information will ensure that information being shared is:

- Necessary for the purposes
- Only shared with those individuals who require access to it
- Is proportionate to the concerns identified
- Accurate and up to date
- Shared in a timely fashion and in a secure manner

Staff will be reminded to follow the 'think, check, share' procedure when considering whether they have identified a safeguarding concern:

- **Think** – Staff will consider what they have seen or learned when observing or communicating with a pupil and whether it causes concern for the safety of the pupil. Staff will then ask themselves whether sharing this information could protect the pupil from harm
- **Check** – Staff will consider who should be made aware of the information and how this can be communicated safely and securely
- **Share** – Finally, staff will share the information with those who need to know so that the pupil can be protected from harm

TCAT and our schools will enter into a data sharing agreement with any others that it will be sharing information with to:

- Be clear about what information is being shared
- Provide clarity about how it will happen
- Demonstrate responsibility and compliance with data protection law

4. Purpose of sharing information

TCAT and our schools will remain clear that our purpose for sharing information in relation to safeguarding will always be necessary in order to protect the health and wellbeing of pupils. When sharing information, we will adopt a risk-based approach.

All staff will understand that information sharing is always necessary when it comes to safeguarding pupils and will be made aware that, where safeguarding concerns arise, they should share all the information required in order to protect the pupil concerned.

TCAT or our schools will record the purposes for sharing information and will only use personal data for a new purpose if it is compatible with the original purpose. Consent can be obtained or where there is a clear obligation or function set out in law.

TCAT and our schools will:

- Clearly identify its purpose or purposes for processing
- Document these purposes
- Include details of the purposes in the privacy information for individuals
- Regularly review processing and update documentation and privacy for individuals where necessary
- Where using personal data for a new purpose other than a legal obligation or function set in law, check that this is compatible with the original purpose or obtain specific consent for the new purpose

Where safeguarding concerns are being raised to external organisations, e.g. local safeguarding partners including the Herefordshire Safeguarding Board admin.sbu@herefordshire.gov.uk, CYPMHS and the police, consideration will be given to the extent of information that should be shared in order to protect the pupil concerned.

TCAT and our schools will consider sharing only minimal information where this is sufficient to fulfil the purpose of protecting pupils, e.g. when accessing support for a service to benefit a pupil. We will, however, understand where it is necessary to share information more widely or to share more information on a pupil's circumstances, e.g. where there are concerns about serious harm.

We will consider the relevance of sharing details of a pupil's history or circumstances and when doing so, will share this information proportionately in a way that it can be linked back to a compelling reason to share, i.e. it is necessary to safeguard the pupil.

5. Data protection principles and lawful basis

TCAT and our schools will keep in mind the principles of the UK GDPR, the Data Protection Act 2018 and human rights law whilst understanding that they are not barriers to information sharing related to safeguarding, but rather a framework to ensure that information is shared appropriately.

Staff will be provided with information on where they can receive advice on data protection in order to make the right decisions when sharing safeguarding information.

TCAT and our schools will ensure that the following seven data protection principles are followed when handling or sharing personal information:

- Lawfulness, fairness and transparency
- Purpose limitation – information is shared only for clear, specified and legitimate purposes
- Data minimisation – information shared is adequate, relevant and limited to what is necessary for the purpose of safeguarding pupils
- Accuracy – information is reviewed and kept up to date
- Storage limitation – information is not kept for longer than is necessary for the intended purpose
- Integrity and confidentiality – appropriate security is ensured
- Accountability – compliance with principles is demonstrated

We will ensure that information sharing is appropriate for the chosen lawful basis and the applied circumstances. When choosing the appropriate lawful basis for sharing agreements, we will use the ICO's lawful basis interactive guidance tool in order to ensure that the appropriate lawful basis is being used based on the context of the safeguarding information being shared.

At least one lawful basis will be identified prior to sharing information, and we will ensure that we can demonstrate that we have considered which lawful basis to use in order to satisfy the accountability principle.

Records of decisions and reasons for these decisions will be maintained.

Consent will not be required for sharing information in the context of safeguarding; however, we will ensure that the appropriate lawful basis has been identified prior to sharing information.

Staff will be trained on identifying the appropriate lawful basis to ensure that concerns are dealt with swiftly.

The following lawful bases for sharing information will be clearly communicated to staff members and how they apply to TCAT and our schools in the context of safeguarding:

- Public task
- Legitimate interests
- Legal obligation
- Vital interests

- Consent

All staff will be aware that information sharing is always necessary where a pupil's life or immediate wellbeing may be at risk and that this will fall under the vital interests basis. Staff will also be aware of their duties to share information to safeguard a child where this falls under a legal obligation outside of data protection, e.g. the legal requirement for teachers to report FGM.

Staff will be aware that, whilst it is good to work with the knowledge and understanding of those involved in the sharing of safeguarding information, the lawful basis of consent is not required for sharing information in the context of safeguarding, and that the withholding of consent will not impact the ability to share information for a legitimate safeguarding purpose.

It will be important, however, to consider whether any of the information disclosed by a pupil should be withheld from certain individuals in order to reduce the risk of further harm to the pupil.

When sharing special category data – which is sensitive data that includes information about health, or revealing racial or ethnic origin – in addition to identifying a lawful basis TCAT and our schools will ensure that the following is met:

- A condition for processing under Article 9 of the UK GDPR, including health and social care
- For some of those provisions, a condition in the Data Protection Act 2018, including substantial public interest conditions such as the safeguarding of children and individuals at risk

When processing special category data, TCAT and our schools will ensure that we document which special categories of data are being processed and will consider whether a DPIA is required.

We will share relevant personal information required to keep a pupil at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

We will comply with the right of individuals under Article 15 of the UK GDPR to access and receive a copy of their personal data in accordance with the Subject Access Request (SAR) Policy.

Staff will be advised to speak to the DPO via the CFO or direct if they are unsure about sharing safeguarding information and the DSL if they are unsure whether their concern constitutes a safeguarding issue.

6. Assessing risks

When making decisions about sharing information about a pupil, TCAT and our schools will ensure that the risks have been thoroughly assessed.

A DPIA will be utilised to help plan for information sharing and to assess and mitigate the risks to pupils' rights and freedoms. The DPIA will be used to ensure that sharing is done safely, lawfully and with accountability.

The CFO in consultation with the DPO will prepare the DPIA based on their expertise and the information they have been provided with.

TCAT and our schools will not always be able to conduct a DPIA in one-off circumstances, or in an urgent or emergency situation where a staff member needs to raise their concerns over something they have seen as a matter of urgency. In these situations, information will be shared swiftly based on what is necessary and proportionate in the circumstances at the time to safeguard the pupil.

7. Sharing information in an emergency

In the event of an emergency, we will not hesitate to share information to safeguard a pupil and will prioritise protecting the safety of the pupil over following the usual process of sharing information; however, a proportionate approach will be taken based on the circumstances.

A record of what has been shared, who with and why will be produced by the DSL as soon as possible.

We will plan ahead for emergency or urgent situations to ensure that everyone knows what to do and the process to follow.

Planning ahead will include considering what circumstances would mean that withholding information may cause more harm than sharing it.

TCAT and our schools must refuse to share personal data if doing so would be likely to result in serious harm to:

- The child
- Another child
- An adult

This is called the Serious Harm Test, and it is an explicit safeguard in law.

Staff will receive training that is updated regularly and as required in order to ensure that they know what to do in the event of a safeguarding emergency, how to report information and who to report it to.

Monitoring and review

Lifespan of Policy: 3 Years

At any point this policy is updated or fully reviewed, it will be updated on the main TCAT website and will automatically update on all TCAT school websites simultaneously.

Where an annual check or other check results in minor changes, the Version History will be reviewed and updated with a change in the number following the decimal point, for example, v1.1 ⇒ v1.2. Where the policy is reviewed in full, then the number before the decimal point will change and reset, for example v1.4 ⇒ v2.0.

Any changes made by the CEO in collaboration with the Board Appointed Trustee will be passed to the Trust Board for ratification and subsequently be notified to Clerks to Local Governing Bodies and Headteachers/Heads of School.

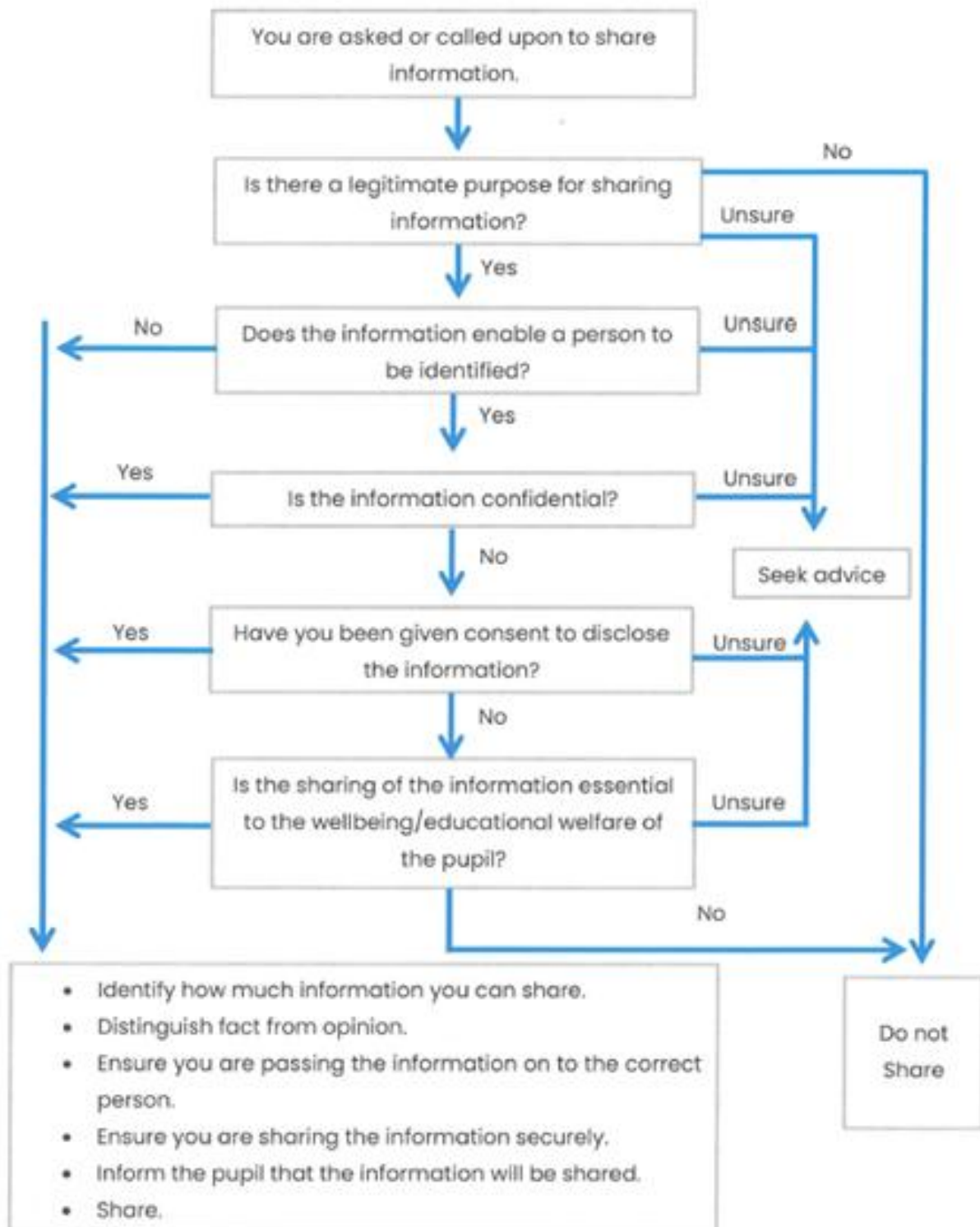
The next scheduled full review date for this policy is 31st August 2029.

Date approved by the Board Appointed Trustee: 30th August 2026.

To be ratified and recorded in the minutes at the first Trust Board Meeting after 30th August 2026.

Appendix A: Staff Information Sharing Flowchart

Staff information sharing flowchart



Trust Glossary

AA	Admissions Authority	H&S	Health and Safety
AAI	Adrenaline Auto-Injector (Epi Pen)	HoS	Head of School
ACM	Asbestos Containing Materials	HSE	Health and Safety Executive
AHT	Assistant Headteacher	ICO	Information Commissioners Office
AIR	Attendance Intervention Reviews	IDSR	Inspection Data Summary Report
APDR	Assess Plan Do Review Cycle	IHP	Individual Healthcare Plan
APIs	Application Programming Interfaces	IRMS	Information and Records Management Society
ASC	Autistic Spectrum Condition	IWF	Internet Watch Foundation
ASP	Analyse School Performance	KCSIE	Keeping Children Safe in Education
ATH	Academy Trust Handbook	KS1/2/3/4	Key Stage 1/2/3/4
BAME	Black, Asian and Minority Ethnic Backgrounds	LAC	Looked After Child
BAT	Board Appointed Trustee	LADO	Local Authority Designated Officer
BCP	Business Continuity Plan	LGB	Local Governing Body
BFR	Budget Forecast Return	LLC	Low-Level Concerns
CEO	Chief Executive Officer	LSA	Learning Support Assistants
CFO	Chief Financial Officer	MASH	Multi-Agency Safeguarding Hub
CIF	Condition Improvement Fund	MAT	Multi-Academy Trust

CIN	Child in Need	MFA	Multi-Factor Authentication
CLA	Children Looked After	MFL	Modern Foreign Language
CMIE	Child Missing in Education	NCSC	National Cyber Security Centre
COO	Chief Operating Officer	NoV	Note of Visit
COSHH	Control of Substances Hazardous to Health	NPQ	National Professional Qualifications
CP	Child Protection	PA	Persistent Absence
CPD	Continuing Professional Development	PAN	Published Admission Number
CPOMS	Child Protection Online Management System	PECR	Privacy and Electronic Communications Regulations
CSCS	Children's Social Care Services	PEP	Personal Education Plan
CSE	Child Sexual Exploitation	PEEP	Personal Emergency Evacuation Plan
CTIRU	Counter-Terrorism Internet Referral Unit	PEx	Permanent Exclusion
CWD	Children with Disabilities	PP	Pupil Premium
CYPMHS	Children and Young People's Mental Health Services	PPG	Pupil Premium Grant
DBS	Disclosure and Barring Service	PSHE	Personal, Social and Health Education
DDSL	Deputy Designated Safeguarding Lead	PSED	Public Sector Equality Duty
DfE	Department for Education	PTFA	Parent, Teacher and Friends Association
DHT	Deputy Headteacher	QA	Quality Assurance

DSE	Display Screen Equipment	RIDDOR	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations
DSL	Designated Safeguarding Lead	RHE	Relationships and Health Education
DPO	Data Protection Officer	RPA	Risk Protection Arrangement
EAL	English as an Additional Language	RSHE	Relationships, Sex and Health Education
ECT	Early Career Teacher	SA	Severely Absent
EDIB	Equality, Diversity, Inclusion and Belonging	SALT	Speech and Language Therapist
EHA	Early Help Assessment	SARC	Sexual Assault Referral Centre
EHENA	Education, Health and Care Needs Assessment	SBM	School Business Manager
EHCP	Education, Health and Care Plan	SCC	Standard Contractual Clause
EHE	Elective Home Education	SCITT	School-Centred Initial Teacher Training
ELSA	Emotional Literacy Support Assistant	SCR	Single Central Record
ESFA	Education and Skills Funding Agency	SDP	School Development Plan
EVC	Educational Visit Coordinator	SDQ	Strengths and Difficulties Questionnaire
EWOSSE	Education Welfare and Safeguarding Support Officer	SEF	Self-Evaluation Form
EYFS	Early Years Foundation Stage	SEMH	Social, Emotional, and Mental Health
FBV	Fundamental British Values	SENCO	Special Educational Needs Coordinator
FFT	Fischer Family Trust	SEND	Special Educational Needs and Disabilities

FGM	Female Genital Mutilation	SIP	School Improvement Partner
FGMPO	FGM Protection Order	SLA	Service Level Agreement
FOI	Freedom of Information	SLCN	Speech, Language and Communication Needs
FSM	Free School Meals	SLT	Senior Leadership Team
FTS	Find a Tender Service	SPOC	Single Point of Contact
GAG	General Annual Grant	STEM	Science, Technology, Engineering and Maths
GDPR	General Data Protection Regulation	TA	Teaching Assistant
GIAS	Get Information about Schools	TAC	Team Around the Child
HASH	Herefordshire Association of Secondary Heads	TCAT	Three Counties Academy Trust
HBA	Honour Based Abuse	TUPE	Transfer of Undertakings (Protection of Employment)
HR	Human Resources	VSH	Virtual School Headteacher