



# **ROBERT CLACK SCHOOL**

## **INFORMATION SHARING POLICY**

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*Policy amendments may occur at any time and you should consult the Policies page on the website for the latest update.*

## Controlled Document

|                         |                                                                                                     |
|-------------------------|-----------------------------------------------------------------------------------------------------|
| <b>Title</b>            | Information Sharing Policy                                                                          |
| <b>Author</b>           | Data Protection Officer                                                                             |
| <b>Owner</b>            | Headteacher                                                                                         |
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## Version Control:

| Version | Date        | Author                                                                                                                       | Description of Change                                                                                                         |
|---------|-------------|------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------|
| 1       | 12/09/2018  | Data Protection Enterprise<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a>     | New Policy                                                                                                                    |
| 2       | 01/08/2019  | Data Protection Enterprise<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a>     | Annual Review<br>S4 Link amended                                                                                              |
| 3       | 21/09/2020  | Data Protection Enterprise Ltd<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a> | Annual review<br>S9 Added links to other policies                                                                             |
| 4       | 01/08/2023  | Data Protection Enterprise Ltd<br><a href="http://www.dataprotectionenterprise.co.uk">www.dataprotectionenterprise.co.uk</a> | Policy review. Amendments to: GDPR 2016/679 amended to read UK GDPR<br>Section 7 amended<br>Appendix 1 – ISA Template deleted |
| 5       | August 2026 | Data Protection Enterprise Ltd<br><a href="http://www.dpenterprise.co.uk">www.dpenterprise.co.uk</a>                         | Policy Review. Amendments to Sections: 1,3,4,5,6,7                                                                            |

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## **1. INTRODUCTION**

Sharing information across professional boundaries enables effective coordination, enhances service delivery, and supports the welfare of children and young people. It is therefore essential that the School adopts a joint, structured approach to ensure that information is shared in a way that is effective, lawful, and secure.

However, information sharing carries risks that must be carefully managed. The School must ensure that any sharing of personal data is conducted fairly, lawfully, and in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (DPA), and the Information Commissioner's Data Sharing Code of Practice. The School will keep this policy under review to reflect any relevant provisions of the Data Use and Access Act 2025 (DUAA) as they are brought into force.

## **2. PURPOSE AND SCOPE**

This policy sets out the overarching framework for the lawful and secure sharing of personal data between the School and external organisations whether public, private, or voluntary sector as well as internally.

It applies to all personal data about individuals (including pupils, parents/carers, staff, and governors) that may be shared for educational, safeguarding, operational, or legal purposes.

The policy applies to all individuals working for or on behalf of the School, including employees, contractors, agency staff, consultants, volunteers, and governors when acting in their official capacity.

## **3. WHAT IS INFORMATION SHARING?**

Information sharing refers to the disclosure or exchange of personal data between the School and external organisations, or the sharing of information internally.

Information sharing can take the form of:

- A reciprocal exchange of information
- The School providing data to one or more external parties;
- Several organisations pooling and accessing data collectively;
- Departments within the School sharing data with one another;
- Exceptional, one-off disclosures of information in unexpected or in emergency situations

Where artificial intelligence (AI) systems are used to process personal data on behalf of the School, the School will ensure that appropriate contractual and data protection safeguards are in place. The School will assess whether the provider is acting as a processor, controller or joint controller and will ensure that any processing complies with UK GDPR requirements.

## **4. DECIDING TO SHARE PERSONAL DATA**

Personal data sharing must not be shared unless there is a clear, lawful and justifiable basis for doing so. This means that:-

- The objective of sharing must be specific and proportionate
- A legal basis must be identified under the UK GDPR
- Individuals should be informed, unless an exemption applies
- An Information Sharing Agreement (ISA) should normally be in place where information sharing is regular, systematic or ongoing, unless there is a lawful reason why this is not appropriate.

The sharing of personal data must always be compliant with the UK GDPR, the Data Protection Act 2018 and in line with the Information Commissioner [Data Sharing Code of Practice](#)

Personal data may be shared without an individual's knowledge where permitted by law, such as:-

- The prevention or detection of crime
- The apprehension or prosecution of offenders; or
- The assessment or collection of tax or duty

## 5. BENEFITS OF INFORMATION SHARING AGREEMENT

Information Sharing Agreements (ISAs) provide a clear structure and shared understanding for how personal data will be shared between parties. The benefits include:

- **Promoting effective information sharing:** ISAs remove common barriers by setting agreed standards and procedures.
- **Supporting compliance and public trust:** Signatories confirm they will comply with relevant legislation and safeguards, enhancing accountability and transparency.
- **Reducing duplication:** Standardised guidance and templates avoid repeated drafting of similar agreements.
- **Clarifying roles and responsibilities:** ISAs set out exactly what data will be shared, the legal basis, how it will be protected, and the process for doing so.
- **Minimising risk:** Following agreed processes reduces the likelihood of unlawful, inappropriate, or insecure data sharing.
- **Providing evidence of decision-making:** ISAs formalise the justification and legal grounds for sharing data, reducing the School's risk of regulatory action.

## 6. DATA PROTECTION IMPACT ASSESSMENTS (DPIA)

A Data Protection Impact Assessment (DPIA) must be considered before entering into any new information sharing arrangement, particularly where the sharing is likely to result in a high risk to the rights and freedoms of individuals.

DPIAs support the School identifying and mitigating data privacy risks before data sharing begins. The School's Data Protection Officer (DPO) must be consulted in advance of any planned data sharing, especially where the sharing is regular, large-scale or involves sensitive data.

DPIAs should accompany any proposed Information Sharing Agreement or other significant data sharing initiative.

## 7. PROCESS

The School DPO should be consulted before any new, regular or high-risk data sharing takes place.

Where an Information Sharing Agreement (ISA) is required, it must:

- Clearly set out the lawful basis for sharing
- Be agreed by all parties involved
- Be reviewed regularly
- Be reviewed by the School's DPO where appropriate and recorded within the School's information governance records.

All information sharing agreements must be stored centrally and made available for audit or inspection. A summary may be provided to the public on request.

## 8. POLICY REVIEW

The Data Protection Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

## 9. LINKS WITH OTHER POLICIES

This Information Sharing policy is linked to the School:

- Data Protection Policy
- Freedom of information Policy
- Security Incident and Data Breach Policy
- CCTV Policy
- Data Protection Impact Assessment Policy
- Information Security Policy
- Safeguarding and Child Protection Policy
- UK GDPR Privacy Notices

The Information Commissioner provides a free helpline and a wide range of guidance and resources relating to information rights and data protection. Further information is available from: [Information Commissioner Office \(ICO\)](#)

**RESTRICTED****NOT TO BE DISCLOSED TO UNAUTHORISED PERSONNEL****REQUEST FOR THE DISCLOSURE OF INFORMATION**

This form should be completed whenever an external organisation requests personal data from the School, or where the School requests personal data from another organisation, unless another formal information sharing process already exists.

|                                                                                                                    |                                                 |
|--------------------------------------------------------------------------------------------------------------------|-------------------------------------------------|
| <b><u>Details of Information Required</u></b>                                                                      |                                                 |
| <b>Name of person(s):</b>                                                                                          | <b>Date of Birth:</b>                           |
| <b>Current address:</b>                                                                                            |                                                 |
| Has the individual been informed of this request: <input type="checkbox"/> Yes <input type="checkbox"/> No         |                                                 |
| If no, explain why:                                                                                                |                                                 |
| Please describe the information required and what outcome is the information intended to achieve?                  |                                                 |
| Please identify the lawful basis relied upon for requesting or sharing the information:                            |                                                 |
| <input type="checkbox"/> Public Task                                                                               | <input type="checkbox"/> Legitimate Interests   |
| <input type="checkbox"/> Consent                                                                                   | <input type="checkbox"/> Legal Obligation       |
| <input type="checkbox"/> Vital Interests                                                                           | <input type="checkbox"/> Other (please specify) |
| The requesting organisation confirms that:                                                                         |                                                 |
| <input type="checkbox"/> The information will only be used for the purpose stated in this request.                 |                                                 |
| <input type="checkbox"/> Access will be restricted to authorised personnel.                                        |                                                 |
| <input type="checkbox"/> The information will not be shared with any third party unless authorised by law.         |                                                 |
| <input type="checkbox"/> The information will be retained only for as long as necessary and then securely deleted. |                                                 |
| <b>Declaration:</b>                                                                                                |                                                 |

I confirm that the information requested is necessary, proportionate and relevant for the purpose identified above and that I am authorised to make this request on behalf of my organisation.

Name:

Role/Position:

Organisation:

Date:

## CONFIDENTIALITY AGREEMENT

To enable the exchange of information between attendees at this meeting to be carried out in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, the Human Rights Act 1998 and the common law duty of confidentiality, all attendees are asked to agree to the following. This agreement will be recorded in the minutes.

1. Information can be exchanged within this meeting for the purpose of identifying any action that can be taken by any of the agencies or departments attending this meeting to resolve the problem under discussion.
2. A disclosure of information outside the meeting, beyond that agreed at the meeting will be considered a breach of the subjects' confidentiality and a breach of the confidentiality of the agencies involved.
3. All documents exchanged should be marked 'Restricted – not to be disclosed without consent'. All minutes, documents and notes of disclosed information should be kept in a secure location to prevent unauthorised access.
4. If further action is identified, the agency(ies) who will proceed with this action(s) should then make formal requests to any other agencies holding such personal information as may be required to progress this action quoting their legal basis for requesting such information. Information exchanged during the course of this meeting must not be used for such action.
5. If the consent to disclose is felt to be urgent, permission should be sought from the Chair of the meeting and a decision will be made on the lawfulness of the disclosure such as the prevention or detection of crime, apprehension or prosecution of offenders, or where it is required to prevent injury or damage to the health of any person.

This confidentiality agreement is in relation to the \_\_\_\_\_ meeting(s)

Name: \_\_\_\_\_ Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Representing (School/Organisation): \_\_\_\_\_



## MEETING ATTENDANCE SHEET

MEETING: \_\_\_\_\_

DATE: \_\_\_\_\_

The persons listed below agree that any information received during the course of this meeting will remain confidential at all times. Persons named below are prohibited from disclosing/using any information received/obtained without the authority of the appropriate Data Controller. Any processing of data without the appropriate authority is an offence under the UK General Data Protection Regulation and the Data Protection Act 2018.

| ORGANISATION | NAME | ROLE | SIGNATURE |
|--------------|------|------|-----------|
|              |      |      |           |
|              |      |      |           |
|              |      |      |           |
|              |      |      |           |
|              |      |      |           |