



# Information Sharing Policy – DigiTribe / Creative Active Lives CIC

## 1. Introduction

Sharing information is vital for safeguarding and promoting the welfare of children and young people to facilitate early intervention to ensure that those with additional needs receive the services they require and that children are protected from abuse and neglect.

Often, it is only when information from a number of sources has been shared and is then put together that it becomes clear that a child is at risk of suffering significant harm.

A key factor in many Serious Case Reviews has been a failure to record information, to share it, to understand the significance of the information shared, and to take appropriate action in relation to known or suspected abuse or neglect.

Practitioners are often concerned about sharing information and uncertain about when they can do so lawfully. This procedure provides a summary of the general principles to be followed by all practitioners on this issue.

The general principle is that consent should be obtained from children and young people (depending on their age and understanding) and their families before information about them is shared with others.

### **Confidential information and the public interest**

Confidential information is information of some sensitivity, which is not public knowledge, and which has been shared in a relationship where the person giving the information understood that it would not be shared with others.

Confidence is only breached where the sharing of confidential information is not authorised by the person who provided it or to whom it relates. If the information was provided on the understanding that it would be shared with a limited range of people or for limited purposes, then sharing in accordance with that understanding will not be a breach of confidence. Similarly, there will not be a breach of confidence where there is explicit consent to the sharing.

Even where sharing of confidential information is not authorised, it may lawfully be shared if this can be justified in the public interest. Seeking consent should be the first option, if appropriate. Where consent cannot be obtained to the sharing of the information or is refused, or where seeking it is likely to undermine the prevention, detection or prosecution of a crime, the question of whether there is a sufficient public interest must be judged by the practitioner on the facts of each case. Therefore, where a practitioner has a concern about possible significant harm to a child, he or she should not regard refusal of consent as necessarily precluding the sharing of confidential information.

A public interest can arise in a wide range of circumstances, for example, to protect children and young people or other people from harm, to promote the welfare of children or to prevent crime and disorder. The key factor in deciding whether or not to share confidential information is proportionality, i.e. whether the proposed sharing is a response in proportion to the need to protect the public interest in question. In making the decision, the practitioner must weigh up what might happen if the information is shared against what might happen if it is not, and make a decision based on a reasonable judgement.

### **Consent to information sharing**

When an organisation considers that it will need to share information in order to promote the wellbeing of a child or young person under 16, consent should be obtained from a parent or other person with parental responsibility.

In relation to young people of 16 and over, they have the right to give and withhold consent independently of their parents' views.

Where a child is under 16, he or she may wish to give or withhold consent independently of and in contradiction to their parents' views. This wish should be upheld where the child is considered to be of sufficient understanding to give informed consent. It is for the practitioner working with the child to make this judgement as to whether the child or young people can appreciate what is being proposed, having regard to their age and level of understanding. The practitioner should also seek advice from his or her line manager or other relevant person in the organisation. Further guidance can be found in Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (March 2015).

Therefore, practitioners should explain to children and young people and families openly and honestly, what and how information will, or could be shared and why, and seek their consent about with whom and what information.

## **2. Purpose of Information Sharing**

At DigiTribe / Creative Active Lives CIC, we collect personal information to:

- Manage bookings and attendance for online and in-person sessions.
- Communicate with parents, carers, and participants.
- Ensure the safety and well-being of all participants.
- Comply with legal obligations, safeguarding requirements, and funder reporting.

## **3. Types of Information Collected**

### **Online Sessions (Acuity Booking System):**

- Parent/carer name
- Email address
- Child's Gamer tag
- Child's age
- Optional access requirements

### **In-Person Sessions:**

- Parent/carer name
- Optional email (for mailing list)
- Child's name and age
- First part of postcode (for anonymised reporting to funders)
- Emergency contact details (for use only in case of illness during the session)

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## 4. Legal Basis for Processing Data

We process personal data under GDPR legal bases:

- **Contractual necessity:** To deliver sessions and manage bookings.
- **Consent:** For optional data such as mailing list subscriptions or access requirements.
- **Legal obligation:** To comply with safeguarding and reporting requirements.

## 5. Consent and Children's Data

- We collect children's personal data from their parent or carer.
- Children aged 16 and over may give consent independently if they have sufficient understanding.
- Consent is obtained where required and can be withdrawn at any time.

## 6. Information Sharing

We **do not share personal information with third parties** unless:

- Required by law.
- Necessary for safeguarding purposes.
- Explicit consent has been obtained.

We may share anonymised data with funders for reporting purposes.

**Third-party services:** Online booking systems, mailing platforms, or other partners are considered data processors and are GDPR compliant.

## **7. Data Security**

- All personal data is stored securely and accessed only by authorised staff.
- Technical and organisational measures prevent unauthorised access, loss, or disclosure.

## **8. Data Retention**

- Booking and attendance data: retained for 6 months after sessions.
- Mailing list: retained until opt-out.
- Emergency contact details: retained until the child no longer attends sessions.

## **9. Rights of Individuals**

Parents, carers, and participants have the right to:

- Access their personal data.
- Request correction of inaccurate or incomplete data.
- Request deletion of their data.
- Object to or restrict processing where applicable.
- Withdraw consent at any time.

## **10. Related Policies**

- Safeguarding Policy
- Data Protection Policy
- Privacy Policy