

# FOOTSTEPS TRUST DATA SHARING POLICY

## 1. Policy Statement

Footsteps Trust Academy recognises that effective information sharing is essential to safeguarding, education, welfare and the promotion of positive outcomes for children and young people.

The Academy is committed to ensuring that personal information is:

- Shared lawfully.
- Shared fairly.
- Shared securely.
- Shared only when necessary.
- Shared in the best interests of children and young people.

The Academy recognises that fears about sharing information must not prevent appropriate action being taken to safeguard and promote the welfare of children.

## 2. Purpose

This policy aims to ensure that:

- Personal information is handled appropriately.
- Safeguarding responsibilities are supported.
- Legal obligations are fulfilled.
- Information is shared securely.
- Individuals' rights are respected.
- Staff understand their responsibilities.

## 3. Legislative Framework

This policy has regard to:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Human Rights Act 1998
- Keeping Children Safe in Education 2026
- Working Together to Safeguard Children
- Education (Information About Individual Pupils) (England) Regulations 2013
- Freedom of Information Act 2000
- Independent School Standards Regulations

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## 4. Principles of Information Sharing

The Academy will ensure that personal data is:

- **Lawful** - Information will only be shared where a lawful basis exists.
- **Necessary** - Only information necessary for the purpose will be shared.
- **Proportionate** - The minimum amount of information required will be disclosed.
- **Accurate** - Information shared should be accurate and up to date.
- **Timely** - Information will be shared promptly where delays could place individuals at risk.
- **Secure** - Appropriate security measures will be used when transferring information.

## 5. Safeguarding Information Sharing

Footsteps Trust Academy recognises that safeguarding information sharing is critical to protecting children.

In accordance with KCSIE 2026:

- Information may be shared without consent where there is a safeguarding concern.
- The welfare of the child is paramount.
- Staff should not assume that consent is always required.
- Information should be shared with relevant agencies where necessary to protect a child from harm.

Examples include concerns relating to:

- Abuse and neglect.
- Child-on-child abuse.
- Child sexual exploitation.
- Criminal exploitation.
- County lines.
- Radicalisation and extremism.
- Missing education.
- Mental health concerns.
- Serious attendance concerns.

Safeguarding information sharing decisions will be recorded appropriately.

## 6. Who the Academy May Share Information With

### Department for Education (DfE)

The Academy may share information with the DfE where required by law or regulatory requirements.

This may include information relating to:

- Pupil records.
- Census returns.
- Educational outcomes.
- Attendance.
- Post-16 destinations.

### Local Authorities

Information may be shared with Local Authorities for purposes including:

- Educational provision.
- Attendance monitoring.
- Alternative Provision commissioning.
- SEND support.
- Education Health and Care Plans (EHCPs).
- Post-16 transition arrangements.
- Safeguarding and child welfare matters.

### Children's Social Care

Information may be shared where:

- A safeguarding concern exists.
- A child is subject to Child in Need plans.
- Child Protection plans are in place.
- Early Help support is being coordinated.

The Academy will work collaboratively with Social Care in the best interests of the child.

### Police and Other Enforcement Agencies

Information may be shared with:

- Police
- Youth Offending Services
- Probation Services
- Other law enforcement agencies

where lawful and necessary for:

- Safeguarding.
- Crime prevention.
- Public protection.
- Investigations.

### Health Professionals

Information may be shared with:

- School Nursing Services
- CAMHS

- NHS services
- GPs
- Mental Health Professionals

where necessary to support:

- Health needs.
- Emotional wellbeing.
- Medical treatment.
- Safeguarding concerns.

### Referring Schools and Commissioners

As an Alternative Provision, Footsteps will regularly share information with:

- Referring schools.
- Commissioners.
- Virtual Schools.
- Local Authorities.

This may include:

- Attendance data.
- Academic progress.
- Behaviour information.
- Safeguarding concerns.
- Reintegration planning.
- Post-16 planning.

Information sharing supports continuity of education and safeguarding.

## 7. Special Educational Needs and Disabilities (SEND)

The Academy may share information relating to SEND where necessary to:

- Support educational progress.
- Meet EHCP requirements.
- Implement reasonable adjustments.
- Coordinate support services.
- Facilitate transitions between provisions.

Only relevant information will be shared.

## 8. Photographs, Images and Media

Photographs and video recordings may be used for:

- Educational purposes.
- Celebrating achievement.
- School displays.
- Publications.
- Academy websites and social media platforms.

Appropriate permissions will be obtained and managed through parental consent and privacy notices.

The Academy will ensure that:

- Photographs are used appropriately.
- Images are stored securely.
- Safeguarding risks are considered.
- Sensitive or inappropriate images are never published.

## 9. Secure Information Sharing

Information may be shared through:

- Secure email systems.
- Encrypted file transfers.
- Secure cloud-based services.
- Management Information Systems.
- Secure safeguarding platforms.

Staff must not:

- Share personal data via unsecured methods.
- Store sensitive information on personal devices.
- Transfer records without appropriate authorisation.

## 10. International Transfers

The Academy will only transfer personal data internationally where:

- Appropriate safeguards exist.
- UK GDPR requirements are met.
- Approved contractual protections are in place.

The Data Protection Officer should be consulted before any international transfer occurs.

## 11. Individual Rights

Individuals have the right to:

- Be informed about data sharing.
- Access their data.
- Request corrections.
- Request restriction of processing where applicable.
- Object to certain processing activities.
- Complain to the Information Commissioner's Office (ICO).

These rights are subject to safeguarding, legal and public interest exemptions where applicable.

## 12. Data Breaches

Any unauthorised disclosure or loss of personal information must be reported immediately.

The Academy will:

- Investigate incidents.
- Assess risks.
- Notify affected individuals where necessary.
- Report breaches to the ICO where legally required.

## 13. Record Keeping

The Academy will maintain records of:

- Information-sharing decisions.
- Safeguarding disclosures.
- Data-sharing agreements.
- Data breach incidents.
- Information requests.

Records will be maintained in accordance with the Academy's Data Retention Policy.

## 14. Monitoring and Review

The Principal, Designated Safeguarding Lead and Data Protection Officer will monitor:

- Compliance with this policy.
- Safeguarding information sharing.
- Data breaches.
- Staff training.

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- Information-sharing arrangements.

This policy will be reviewed annually or following significant legislative or guidance changes.