



Confidentiality and Information Sharing Policy

At Sunflower Club we believe that all families, staff and members of the Sunflower Management Committee have the right to privacy. Parents/carers, children and young people have the right to know that their information is kept securely and in what circumstances it can be shared. Staff and volunteers need to understand what their role is in information sharing. The effective sharing of information between organisations and agencies is essential to keep children safe.

The Sunflower Club team, including the Manager, staff and Management Committee and any other individual associated with the running or management of the Club will respect confidentiality by:

- Not discussing confidential matters about children/families with other parents/carers.
- Not discussing confidential matters about parents/carers with children or other parents/carers.
- Avoiding sharing confidential information to other persons via social networking media, including photographs
- Not discussing confidential information about other staff members.
- Being aware of the environment for any confidential discussion, ie avoiding busy staff rooms, corridors, or other inappropriate places.
- Only passing sensitive information, in written or oral form, to relevant people.
- Following the Club's Code of Conduct Policy.

Staff

Staff failing to show due regard for confidentiality will be liable to disciplinary action under the provisions of the Staff Disciplinary & Grievance Procedures policy.

Data Protection – also see separate Data Protection Policy

Sunflower Club is also aware of its obligations regarding the storing and sharing of information under the General Data Protection Regulations 2018 and is committed to complying with these regulations and guidance. The Manager and staff are aware of the implications of the GDPR 2018 in so far as it affects their roles and responsibilities within the club.

Data protection law is not a barrier to sharing information when it is necessary, proportionate, and justified to do so. The most important consideration is to safeguard and promote the welfare of the child.

The Data Protection Act 2018 allows all organisations to process data for safeguarding purposes lawfully and without consent where necessary for the purposes of:

- protecting an individual from neglect or physical and emotional harm; or
- protecting the physical, mental or emotional wellbeing of an individual.

This covers situations where a child may be at risk of significant harm due to neglect or abuse and applies to referrals made to the local authority for any child considered to be a 'child in need'.

Circumstances when we will share information

All personal information will be treated as confidential. However confidential information may be shared to other agencies to safeguard and promote the welfare of children. In circumstances where staff have good reason to believe that a child is at risk, or is likely to be at risk, of child abuse or neglect, the Safeguarding Children/Child Protection policy will override confidentiality on a 'need to know' basis.

In some circumstances, seeking consent from a person we believe is neglecting or abusing a child may undermine safeguarding procedures and may increase the risk of harm to the child or another person. In these situations, we will share this information without consent.

If a child makes a disclosure, we will never promise the child confidentiality, instead we will explain that the information will need to be passed on to the appropriate person to help keep them safe.

Our organisation is responsible for lawfully sharing the information we hold, and we must not assume that someone else will pass on information that may be critical to safeguard and promote the welfare of a child.

Principles of Information Sharing

Our organisation will adhere to the following principles of information sharing:

- Information sharing must be necessary and proportionate to the circumstances of the child or young person.
- The information must be shared quickly and securely.
- Use clear and precise language.
- Identify how the information is to be shared.
- Record exactly what has been shared.
- If information is withheld, then that should also be recorded.

When sharing information with any organisation, we will first consider the principles outlined by Government Guidance. We will consult the 7 golden rules for information sharing from '[Information Sharing Advice for Safeguarding Practitioners](#)'

All staff are responsible to share information internally to either the deputy or manager whilst adhering to the 7 golden rules, as above.

The Safeguarding Lead Practitioners will be responsible for handling any external information sharing.

Access and Storage of Information Records

All written information such as personal details and records pertaining to children, parents/carers and all staff will be kept securely in a locked cupboard.

All staff will have access to children's registration forms Medical Records/Allergies – but these will not be on display for other children/parents to see

The Manager and deputy will also have access to staff records and any sensitive safeguarding records kept in a different locked cupboard. They will share any other sensitive information on a need to know basis with staff and Committee.

Retention of Records

Sunflower Club is registered on the Early Years Register and therefore required to keep records of complaints, child details, attendance, contact information, accidents, medication records, death, injury, disease or dangerous occurrence that's reportable to the HSE under RIDDOR, staff accident records and records of SMP, SSP, income tax and NI. These will be kept for a minimum of 3 years.

Records that will be kept for longer include:

- Personnel files, training records, wages, accounts and Committee minutes which will be kept for 6 years.
- Safeguarding records until the named child turns 25.

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