Confidentiality and Information Sharing Policy

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Related Documents:

Safeguarding and Child Protection Policy
Data Protection Policy

Your Success, Our Pride

Oxbridge Group Ltd: Confidentiality and Information Sharing Policy

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Oxbridge Group Ltd: Confidentiality and Information Sharing Policy

Introduction

At Oxbridge Group Ltd we believe that the safety, well-being and protection of the children and young people in our care is the paramount consideration in all decisions staff, volunteers and homestays make about confidentiality. The appropriate sharing of information between colleagues is an essential element in ensuring our children and young people's well-being and safety.

It is an essential part of the ethos of our company that trust is established to enable children, young people, parents, staff, volunteers and homestays to seek help both within and outside the organisation. We aim to minimise the number of situations when personal information is shared to ensure children, young people, parents, staff, volunteers and homestays are supported and safe.

Staff, volunteers and homestays need to know the boundaries of confidentiality in order to feel safe and comfortable discussing personal issues and concerns, including sex and relationships.

Oxbridge Group Ltd's attitude to confidentiality is easily understood and everyone should be able to trust the boundaries of confidentiality operating within the company.

Issues concerning personal information including sex and relationships and other personal matters can arise at any time.

Everyone involved with Oxbridge Group Ltd needs to know that no-one can offer absolute confidentiality.

Everyone involved with Oxbridge Group Ltd needs to know the limits of confidentiality that can be offered by individuals within the organisation so they can make informed decisions about the most appropriate person to talk to about any health, sex and relationship or other personal issue they want to discuss.

Related Guidance

This policy is based upon the following guidance:

- Keeping Children Safe in Education – Statutory guidance for schools and colleges 2026
  Keeping_children_safe_in_education_2026_.pdf
- Working Together to Safeguard Children, 2026
  Working_together_to_safeguard_children_2026_a_guide_to_multi_agency_working.pdf

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- Data (Use and Access) Act 2025 Data (Use and Access) Act 2025
- Data Protection Act (2018) Data Protection Act 2018
- UK GDPR (2021) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (United Kingdom General Data Protection Regulation) (Text with EEA relevance)
- Information Sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (2024)
  Information sharing: advice for practitioners (publishing.service.gov.uk)

Definition of Confidentiality

Confidentiality: "*Confidentiality* refers to the obligations of individuals and institutions to use information that has been disclosed to them and is under their control appropriately." (Cambridge English Corpus)

Oxbridge Group Ltd recognize our responsibility as both an employer and through working with young people, to exhibit discretion and follow relevant policies when dealing with sensitive topics and personal information.

In reference to the Safeguarding and Child Protection Policy, as well as the Data Protection Policy, Oxbridge Group Ltd follow the guidance detailed in the government documents detailed above when making decisions on whether to share information, and who to share that information with.

Offering absolute confidentiality to someone else would be offering to keep the content of his or her conversation completely secret and discuss it with no-one. Given the nature of our role, it is not practical to offer absolute confidentiality within Oxbridge Group Ltd. We strive to strike a balance between ensuring the safety, well-being and protection of our children, young people, parents, staff, volunteers and homestays, whilst ensuring there is an ethos of trust where individuals can ask for help when they need it. We believe in ensuring that when it is essential to share personal information, safeguarding and child protection issues and good practice are followed.

This means that in practice what is offered is limited confidentiality.

Disclosure of the content of a conversation could be discussed with professional colleagues, but the confider would not be identified except in certain circumstances.

Staff, volunteers and Homestays should make it clear that there are limits to confidentiality at the beginning of the conversation. These limits relate to ensuring children's safety and well-being. The child or young person will be informed when a confidence has to be broken for this reason and will be involved in the information sharing process.

One-to-one disclosures to members of staff, schools, volunteers or homestays

It is essential that all members of staff, schools, volunteers and homestays know the limits of the confidentiality which they can offer to children and parents, and any required actions and sources of further support or help available both within Oxbridge Group Ltd and from other agencies where appropriate.

All staff, schools, volunteers and homestays working with Oxbridge Group Ltd encourage children and young people to discuss different issues with their parents or guardians and vice versa. However, the needs of the child or young person are paramount and the Oxbridge Group Ltd will not automatically share information about the child or young person with his/her parents unless it is considered to be in their best interests.

The seven golden rules to sharing information – from Information Sharing: Advice for Practitioners (2024)

1. **All children have a right to be protected from abuse and neglect**. Protecting a child from such harm takes priority over protecting their privacy, or the privacy rights of the person(s) failing to protect them. The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA) provide a framework to support information sharing where practitioners have reason to believe failure to share information may result in the child being at risk of harm.

2. When you have a safeguarding concern, **wherever it is practicable and safe to do so, engage with the child and/or their carer(s),** and explain who you intend to share information with, what information you will be sharing and why. You are not required to inform them, if you have reason to believe that doing so may put the child at increased risk of harm (e.g., because their carer(s) may harm the child, or react violently to anyone seeking to intervene, or because the child might withhold information or withdraw from services).

3. **You do not need consent to share personal information about a child and/or members of their family if a child is at risk or there is a perceived risk of harm.** You

need a lawful basis to share information under data protection law, but when you intend to share information as part of action to safeguard a child at possible risk of harm, consent may not be an appropriate basis for sharing. It is good practice to ensure transparency about your decisions and seek to work cooperatively with a child and their carer(s) wherever possible. This means you should consider any objection the child or their carers may have to proposed information sharing, but you should consider overriding their objections if you believe sharing the information is necessary to protect the child from harm.

4. **Seek advice promptly whenever you are uncertain or do not fully understand how the legal framework supports information sharing in a particular case.** Do not leave a child at risk of harm because you have concerns you might be criticised for sharing information. The DSL or Data Protection Officer can offer advice on legal information on information sharing.

5. When sharing information, ensure you and the person or agency/organisation that receives the information take steps to **protect the identities of any individuals** (e.g., the child, a carer, a neighbour, or a colleague) who might suffer harm if their details became known to an abuser or one of their associates.

6. Only share relevant and accurate information with individuals or agencies/organisations that have a role in safeguarding the child and/or providing their family with support, and only share the information they need to support the provision of their services. Sharing information with a third party rarely requires you to share an entire record or case-file – **you must only share information that is necessary, proportionate for the intended purpose, relevant, adequate and accurate.**

7. **Record the reasons for your information sharing decision, irrespective of whether or not you decide to share information.** When another practitioner or organisation requests information from you, and you decide not to share it, be prepared to explain why you chose not to do so. Be willing to reconsider your decision if the requestor shares new information that might cause you to regard information you hold in a new light. When recording any decision, clearly set out the rationale and be prepared to explain your reasons if you are asked.

Principles for sharing information

The principles set out below are intended to help staff volunteers and Homestays working with children, young people and parents share information between organisations.

Staff, volunteers and Homestays should use their judgement when making decisions on what information to share and when they should follow Oxbridge Group Ltd procedures or consult with a senior member of staff if in doubt.

The most important consideration is whether sharing information is likely to safeguard and protect a child or young person.

Necessary and proportionate

When taking decisions about what information to share, you should consider how much information you need to release. The Data Protection Act 2018 requires you to consider the impact of disclosing information on the information subject and any third parties. Any information shared must be proportionate to the need and level of risk.

Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make sound decisions.

Adequate

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely

Information should be shared in a timely fashion to reduce the risk of harm. Timeliness is key in emergency situations and it may not be appropriate to seek consent for information sharing if it could cause delays and therefore harm to a child. Staff, volunteers and homestays should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure

Wherever possible, information should be shared in an appropriate, secure way.
Staff, volunteers and homestays must always follow the organisation's policy on security for handling personal information.

Record

Information sharing decisions should be recorded regardless of whether the decision is taken to

share. If the decision is to share, reasons should be cited including what information has been shared and with whom, in line with company procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with Oxbridge Group Ltd own retention policy, the information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review process.

When and how to share information

When asked to share information, you should consider the following questions to help you decide if and when to share. If the decision is taken to share, you should consider how best to effectively share the information.

When

Is there a clear and legitimate purpose for sharing information?
- Yes – see next question
- No – do not share

Does the information enable an individual to be identified?
- Yes – see next question
- No – you can share but should consider how

Is the information confidential?
- Yes – see next question
- No – you can share but should consider how

- Do you have consent?
- Yes – you can share but should consider how
- No – see next question

Is there another reason to share information such as to fulfil a public function or to protect the vital interests of the information subject?
- Yes – you can share but should consider how
- No – do not share

How

- Identify how much information to share

- Distinguish fact from opinion

- Ensure that you are giving the right information to the right individual

- Ensure where possible that you are sharing the information securely

- Inform the individual that the information has been shared if they were not aware of this, as long as this would not create or increase risk of harm.

All information sharing decisions and reasons must be recorded in line with the Oxbridge Group Ltd procedures. If at any stage you are unsure about how or when to share information, you should seek advice and ensure that the outcome of the discussion is recorded.

If there are concerns that a child or young person is suffering or likely to suffer harm, then follow the relevant Safeguarding procedures without delay.

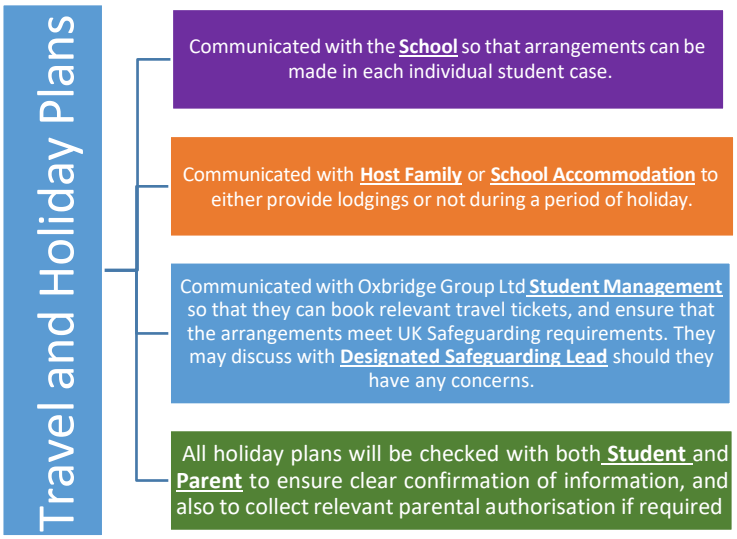
Practical Guide to Sharing of Information

Oxbridge Group Ltd are required to share certain information as part of our daily routines to provide the best possible standard of service to our students. These include, but are not limited to:

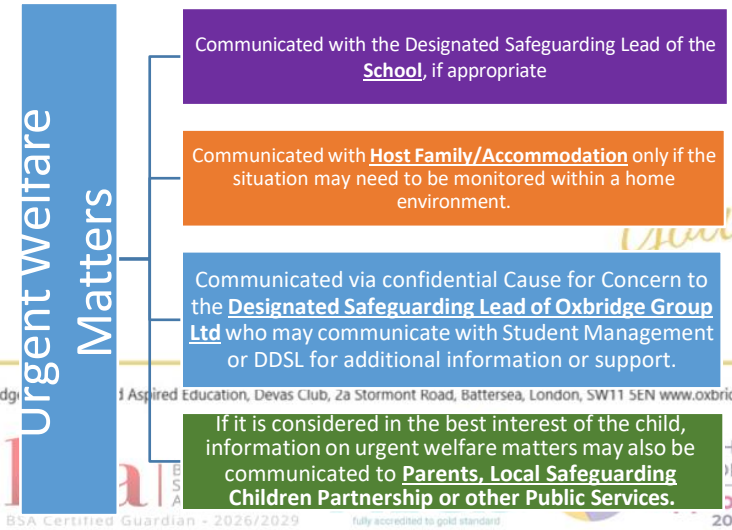
- Information on travel and half term/holiday plans
- Information on urgent welfare matters
- School Reports or other Academic concerns
- Personal Documents to aid Academic or Other Services (Passport/Visa Information) To

ensure clarity on our procedures we have noted below the processes that each of these cases would follow, along with staff or external people who may be consulted in each of these situations.

Information on travel and half term/holiday plans

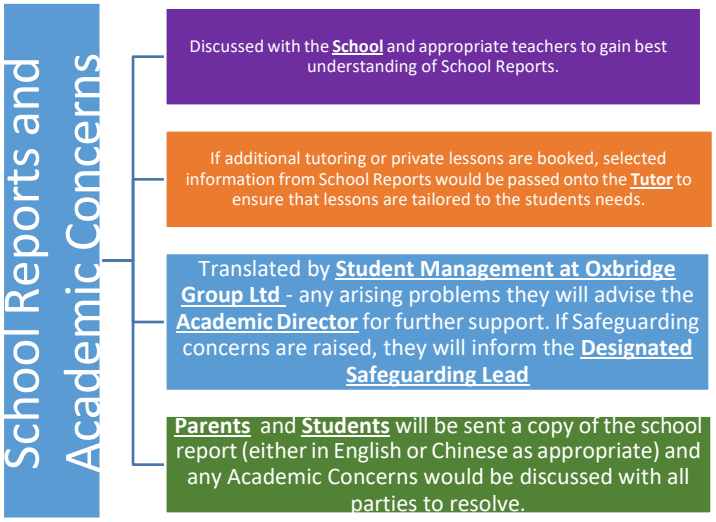


Information on Urgent Welfare Matters

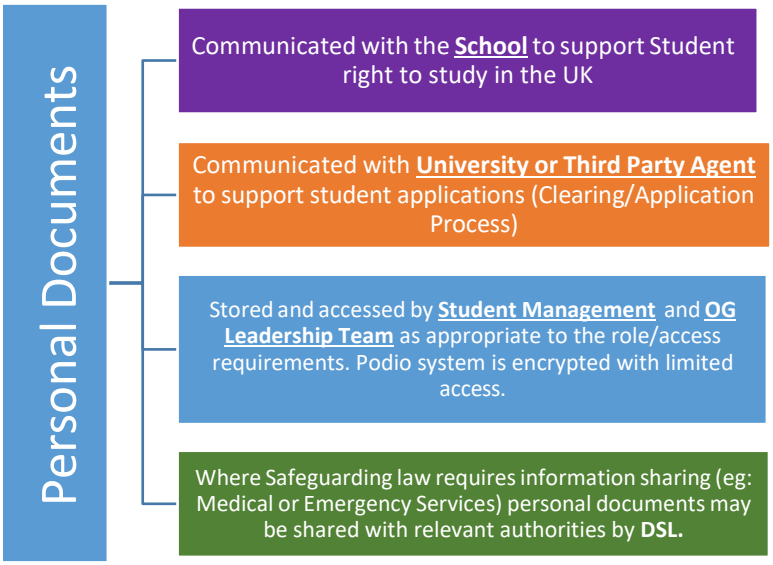


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School Reports or other Academic Concerns



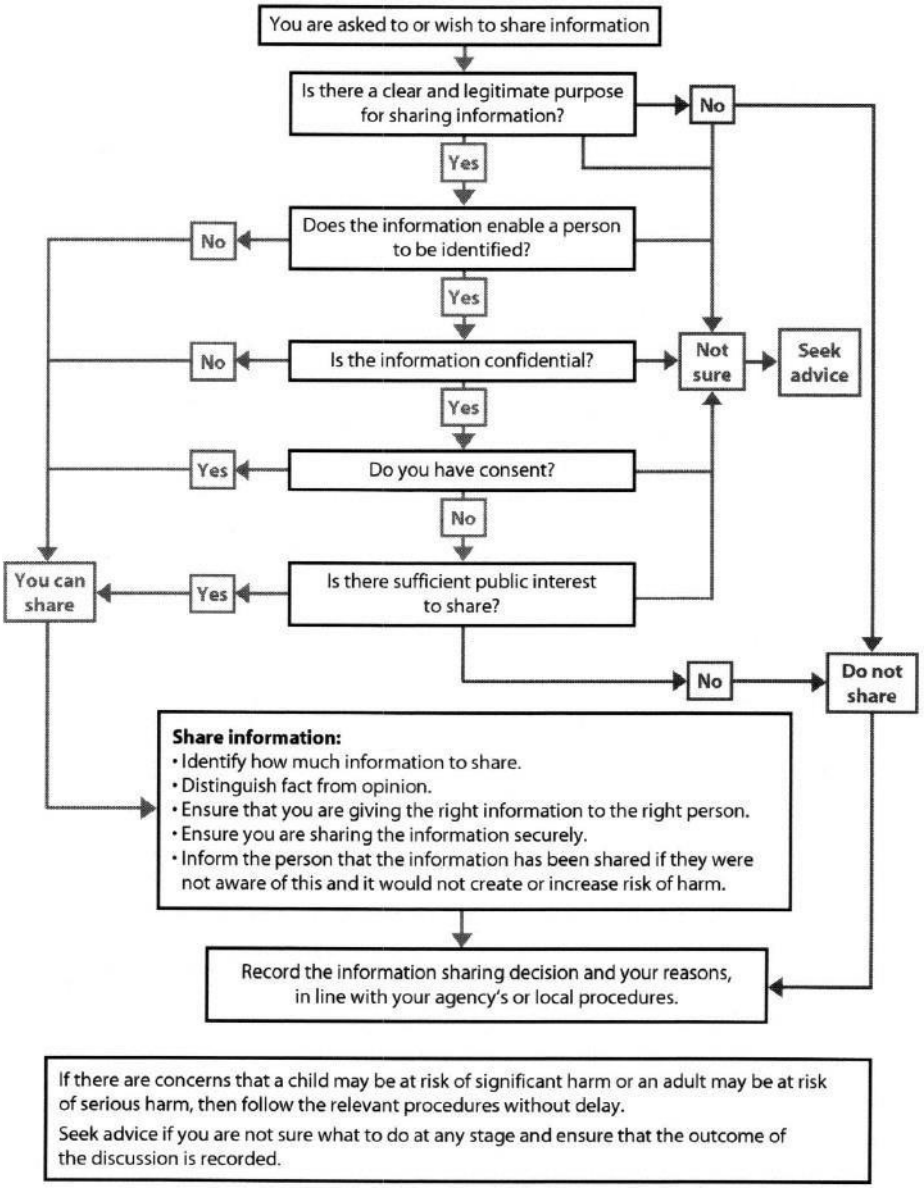
Personal Documents to Aid Academic or Other Services (ID, Visa etc)



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Information Sharing Flowchart



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bsa BOARDING SCHOOLS' ASSOCIATION BSA Certified Guardian - 2026/2029
AEGIS fully accredited to gold standard
BRITISH BOARDING SCHOOLS NETWORK Approved Agent 2025-2026