

7. Keep a record

Record clearly what information you shared or decided not to share, and why. Capture the key factors that informed your decision, including any risks, safeguarding concerns, or professional advice you considered. Note who you shared the information with, when the contact took place, and any agreed actions or follow up steps. Good records ensure clarity, create a reliable audit trail, and support safe and accountable information sharing.

When you request information from another agency, also record what you asked for, why, the lawful basis, and any response you received.

1. GDPR is not a barrier

Remember that data protection and regulation law is not intended as a barrier to info sharing – it helps us to share the right information, in the right way, for the right reasons. Never put management or organisation interests before the safety of others. The principle of confidentiality is not absolute, especially when it is to safeguard adults or children.

It is lawful to share information without consent when it is **necessary and proportionate** to protect a child or adult at risk, or when required for a statutory safeguarding enquiry. The duty to share can be as important as the duty to protect confidentiality.

6. Necessary, proportionate, relevant, accurate, timely and secure

Check these key words. Is it the right information for the purpose? Is it being shared in the right format, with the right people? Is it accurate and up to date? Are you sharing promptly enough for the purpose intended? Think “need-to-know.”

Share only what is necessary and avoid releasing entire records where a small amount of information will do. If another agency requests information, it is appropriate to ask them to specify exactly what they need to ensure you provide only relevant, proportionate details.

2. Be open and honest

Right from the start, be clear with the people we support (and/or their families where needed) what we hold, why we might share it, who might need to know. Try and get informed consent from the beginning where possible.

When requesting information from another agency, be open about who you are, why you need the information, and the lawful basis for asking, so partners understand the safeguarding purpose behind the request.



5. Always consider safety and well-being

When deciding whether to share information, the starting point should always be the safety and welfare of the person at risk. Ask yourself:

- What is the risk of not sharing this information?
Could failing to share leave a child or adult exposed to harm, delay support, or stop agencies from seeing the full picture?
- What will be the impact of sharing — or not sharing — this information?
Think about how your decision affects the individual and anyone else involved, both now and in the longer term.

Remember that no single agency ever holds the whole picture. Requesting information from others may be necessary to fully understand or reduce risk.

4. Share with consent wherever possible

Respect an adult's decision not to consent, provided they have capacity. You may still decide to share the information without consent, where you can evidence that the need is:

- in the public interest (e.g. other adults at risk, staff are implicated)
- the adult, a child, or someone else, is at very serious risk of harm
- a serious crime has been committed
- you suspect coercion or duress is involved in their decision
- the person lacks the mental capacity to make the decision

In addition, you do not need to seek consent if doing so would place someone at greater risk (e.g. domestic abuse, coercive control, or active police enquiries). Sharing is also permitted where required for a statutory safeguarding duty or lawful public task.

3. Seek advice

If in doubt, ask. Have confidence in checking things out with others—no one is expected to manage safeguarding concerns alone. Talk to your safeguarding lead or your line manager, and don't hesitate to seek guidance early if something doesn't feel right. Remember, you do not have to disclose personal or identifying information in order to get someone else's view, even when consulting with the police or the local authority. A quick conversation can help you clarify your next steps and ensure concerns are handled promptly and appropriately.

If you receive an information request that is unclear or too broad, seek clarification before deciding whether to share.