

CONFIDENTIALITY AND INFORMATION SHARING
This policy applies to the whole College, including boarding

(To be read in conjunction with the 'Safeguarding (Child Protection) Policy' and 'Whistleblowing' Policy')

This document is publicly available from the college website and upon request, a copy (which can be made available in large print or another accessible format if required) may be obtained from the College office.

Whole-College Statement

This policy applies to the whole College, including boarding provision, residential accommodation, evening and weekend activities, trips, and all off-site and extended-day arrangements.

It should be read in conjunction with the College **Safeguarding (Child Protection) Policy, Whistleblowing Policy, Data Protection Policy, and Data Retention Policy.**

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Scope

The purpose of this policy is to set out clearly the College's arrangements for confidentiality and information sharing. These arrangements apply equally across:

- the academic day
- boarding houses and residential accommodation
- co-curricular, evening and weekend activities
- trips, visits and off-site provision

All who work, volunteer or supply services to the College, including boarding staff, residential supervisors, night staff, visiting professionals and contractors, have an equal responsibility to understand and implement these arrangements and procedures, both within and outside of normal College hours.

All new employees, volunteers and boarding staff are required to confirm that they have read, understood and will abide by this policy and its related procedural documents, and confirm this by signing the Policies Register.

Monitoring and Review

These arrangements are subject to continuous monitoring, refinement and audit by the Principal.

The Proprietor and the Governance Advisory Committee will undertake a full annual review of this policy, inclusive of its implementation across both day and boarding provision and the efficiency with which the related duties have been implemented. This review will be formally documented in writing.

Any deficiencies or weaknesses recognised in arrangements or procedures will be remedied immediately and without delay. All staff, including boarding staff, will be informed of updated or reviewed arrangements and these will be made available in electronic format.

Reviewed: January 2026

Next Review Date: January 2027

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Signed:

David Game
Proprietor & CEO

John Dalton
Principal

Key Safeguarding and Governance Contacts

To ensure clarity and immediate access to safeguarding advice and decision-making, the following key contacts apply across both day and boarding provision:

Head of Safeguarding: Nedaa Belal

Designated Safeguarding Lead (DSL): Remi Ferguson

Deputy DSLs: As published in the Safeguarding (Child Protection) Policy

Chair of the Governance Advisory Committee and Independent Safeguarding Lead: Jill Bainton

These individuals provide leadership, oversight and independent challenge in relation to safeguarding, confidentiality and information sharing. Contact details for all safeguarding leads are provided to staff and displayed in staff areas and boarding houses.

Aims and Objectives

This policy provides guidance and information on confidentiality and information-sharing procedures for staff, students, parents/carers, boarding staff, residential supervisors, and the Governance Advisory Committee.

It explains how information is managed, shared, recorded and protected in order to safeguard students' welfare while maintaining trust, professionalism and accountability across both academic and residential settings.

Rationale

We believe that:

- The safety, wellbeing and protection of students, including boarders living away from home, are the paramount consideration in all decisions staff make about confidentiality.
- Appropriate sharing of information between College staff, boarding staff and safeguarding leads is an essential element in ensuring student welfare and safeguarding.
- Trust is fundamental to College and boarding life, enabling students to seek help both during the school day and within residential settings.
- Students, parents/carers and staff must understand the boundaries of confidentiality, particularly in boarding contexts where staff may become aware of personal or welfare information outside teaching hours.
- No member of staff can offer absolute confidentiality where safeguarding concerns exist.
- Understanding the limits of confidentiality allows students and families to make informed choices about who to speak to.

Confidentiality – Definition

Confidentiality means information shared in trust that is private and entrusted to another. In a College and boarding context, there are very few circumstances where absolute confidentiality can be offered.

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The College seeks to balance:

- safeguarding and protecting students' welfare;
- maintaining trust within academic and residential relationships; and
- ensuring lawful, proportionate and appropriate information sharing.

In most cases, limited confidentiality applies. Information may be shared with professional colleagues on a strict need-to-know basis, including relevant boarding staff and safeguarding leads, without identifying the confider unless safeguarding, legal or regulatory requirements apply.

General rule: Staff must explain the limits of confidentiality at the outset of discussions, including in boarding and residential settings. Students will be informed when confidentiality must be broken for safeguarding reasons and encouraged to participate in that process where safe.

Legal Context

This policy has regard to and complies with relevant legal and regulatory frameworks, including:

- the Human Rights Act 1998 (Article 8 – right to respect for private and family life);
- UK GDPR and the Data Protection Act 2018, which provide the lawful framework for processing and sharing personal data;
- statutory safeguarding legislation and guidance, including Keeping Children Safe in Education and Working Together to Safeguard Children, which require timely and appropriate information sharing to protect children.

These frameworks support, rather than prevent, justified information sharing where this is necessary to safeguard students or others.

Moral and Values Framework

This policy reflects the College's ethos and boarding values and promotes:

- Respect for self;
- Respect for others;
- Responsibility for personal actions;
- Responsibility towards the College, boarding community and wider society.

Policy Statement

The College respects every individual's right to privacy while recognising its safeguarding duties. All staff and visitors, including boarding and residential staff, must work within this policy.

In practice this includes:

- discouraging gossip in academic and residential settings;
- securing personal and safeguarding records;
- avoiding informal discussion of student matters;
- using teaching and boarding practices that protect confidentiality;
- encouraging students to speak to parents/carers where safe and appropriate, while ensuring students can access support when this is not possible.

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Personal Disclosures

Students will be informed that some information cannot remain confidential. Disclosures made during the school day, in boarding houses, overnight supervision, or during residential activities will be managed sensitively and in line with safeguarding procedures.

All disclosures or concerns must be managed in accordance with the Safeguarding (Child Protection) Policy and escalated appropriately.

Different Levels of Confidentiality in Different Contexts

Confidentiality in teaching and boarding environments

Teaching and residential practice must reaffirm respect and dignity. Strategies include:

Setting ground rules

Ground rules apply in classrooms, boarding meetings and group discussions, including:

- no obligation to disclose personal information;
- the right to pass;
- respect and active listening;
- zero tolerance for bullying or teasing.

Depersonalising

Staff will protect privacy by:

- using third-person scenarios;
- anonymising responses;
- avoiding identification of individuals.

Group and residential settings

In boarding houses and group activities, personal matters should never be discussed publicly. One-to-one settings must be used where appropriate.

One-to-One Disclosures (Including Boarding Staff)

All staff, including boarding and night staff, must understand the limits of confidentiality and the safeguarding and support routes available.

Students are encouraged to involve parents/carers where safe and appropriate, but this is not automatic.

Safeguarding escalation:

Concerns arising in classrooms, boarding houses, overnight supervision, or residential activities must be shared with the DSL (Remi Ferguson) as soon as practicable, and immediately and on the same day where there is risk of harm. The Head of Safeguarding (Nedaa Belal) provides strategic oversight and support.

Contraceptive Advice and Pregnancy

Health professionals working in College or boarding settings owe young people the same duty of care and confidentiality. Professional judgement must include exploration of coercion, abuse or exploitation, with safeguarding referrals made where required.

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Legal Position for College and Boarding Staff

No staff member may promise absolute confidentiality. Information may need to be shared where safeguarding or welfare concerns arise.

Where uncertainty exists, staff must consult the DSL as the first point of advice. Boarding staff should not rely solely on residential line management for safeguarding decisions.

Counsellors and Health Professionals

Professional judgement must balance trust and safeguarding. Confidentiality may only be breached where necessary to protect the student or others, and safeguarding concerns must be escalated to the DSL.

Visitors and Non-Teaching / Boarding Staff

All visitors, volunteers and non-teaching staff must report disclosures to the DSL promptly and discreetly. The DSL will determine further action and ensure appropriate support and supervision for both students and staff.

Other Professionals Working in College and Boarding

Police requests

Disclosure must be lawful, necessary and proportionate. Advice must be sought from the DSL and/or Principal before disclosure wherever practicable.

Hospital discharge

Medical and welfare information relevant to boarding or day provision will be shared on a need-to-know basis to ensure continuity of care and safeguarding.

Starters and Leavers

Information regarding starters and leavers of students of compulsory school age is shared with the Local Authority in accordance with statutory requirements. Where a student of compulsory school age starts or leaves during the term, the College notifies the Local Authority within five working days. Information is shared securely using agreed secure platforms.

Risk of Self-Harm

Concerns arising during the school day or overnight in boarding must be reported to the DSL immediately. Parents/carers will usually be involved unless this increases risk. Emergency services will be contacted where required.

Serious Crime

Students will be supported sensitively, including in boarding contexts, while safeguarding duties and legal requirements are upheld.

Dealing with the Media

All media contact must be referred to the Principal. Boarding staff and residential supervisors must not engage with the media under any circumstances.

Parents and Carers

The College works in partnership with parents/carers while recognising students' need for support and confidentiality. Parents will be informed of policy updates and significant concerns where this is safe and appropriate.

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When Confidentiality Must Be Broken

See the Safeguarding (Child Protection) Policy. Staff must consult the DSL first where safeguarding applies. Where concerns involve leadership or safeguarding systems, escalation may also be made to the Independent Safeguarding Lead and Chair of the Governance Advisory Committee (Jill Bainton).

All decisions must be lawful, proportionate, clearly justified and recorded.

Record Keeping

Safeguarding and confidential records from day and boarding provision are stored securely, with access limited to those with a legitimate need-to-know. Boarding-related records are transferred promptly to safeguarding systems to ensure continuity and oversight.

Information Sharing

Information sharing is essential to safeguarding. Boarding staff must share relevant information with day staff, safeguarding leads and vice versa to ensure continuity of care, particularly during handovers between day and residential provision.

Information will be shared with external safeguarding partners, including local authority children's services, health professionals and the police, where required to safeguard students.

Key Principles for Information Sharing

Information shared must be:

- necessary and proportionate;
- relevant and adequate;
- accurate and timely;
- secure and appropriately recorded.

Dissemination and Implementation

This policy is issued to all teaching, boarding and non-teaching staff. Induction and ongoing safeguarding training reinforce expectations, including specific guidance for boarding and residential staff.

Appendix 1 - Confidentiality Charter

We want to be a College where students can disclose confidential information in a safe and secure environment. We want all students to know and understand what 'confidentiality' means in the College and how that will affect students who do have concerns either about themselves or other students.

We believe students have a right to know that the College is a safe and secure environment where they can discuss their concerns and are informed who this information may need to be shared with.

What is Confidentiality?

Something which is spoken or given in confidence; private.....another's secret affairs.

David Game College wants to promote a safe and secure environment where students can talk about their personal concerns, or concerns they have about their friends, in the knowledge that these will not be shared with all staff, but may have to be shared with key staff members. This is to ensure that students are supported and feel safe whilst at LIFE Wirral

What the College will do:

Sports College.

- Ensure students are aware that the College may have to share any information where a young person is at risk of harm.
- Ensure students are aware of what will happen to the information they have shared.
- Encourage students to discuss their concerns with their parents- as long as this does not place the students at risk of harm.
- Ensure all students have access to agencies outside of the College – giving the students the opportunity to gain support without the College having knowledge.
- Ensure that all data held on students is in line with Acts of Law such as the Data Protection Act and Children Act.
- Ensure students know who the Designated Safeguarding Lead is at the College.
- Ensure students have access to an Independent Listener.
- Ensure all PHE lessons have ground rules for confidentiality.

Students who have disclosed a confidential issue will be supported by:

Being offered someone to talk with and/or access to an outside counsellor or College therapeutic partner.
Being reassured and helped to regain their self-confidence.

As students we will help by:

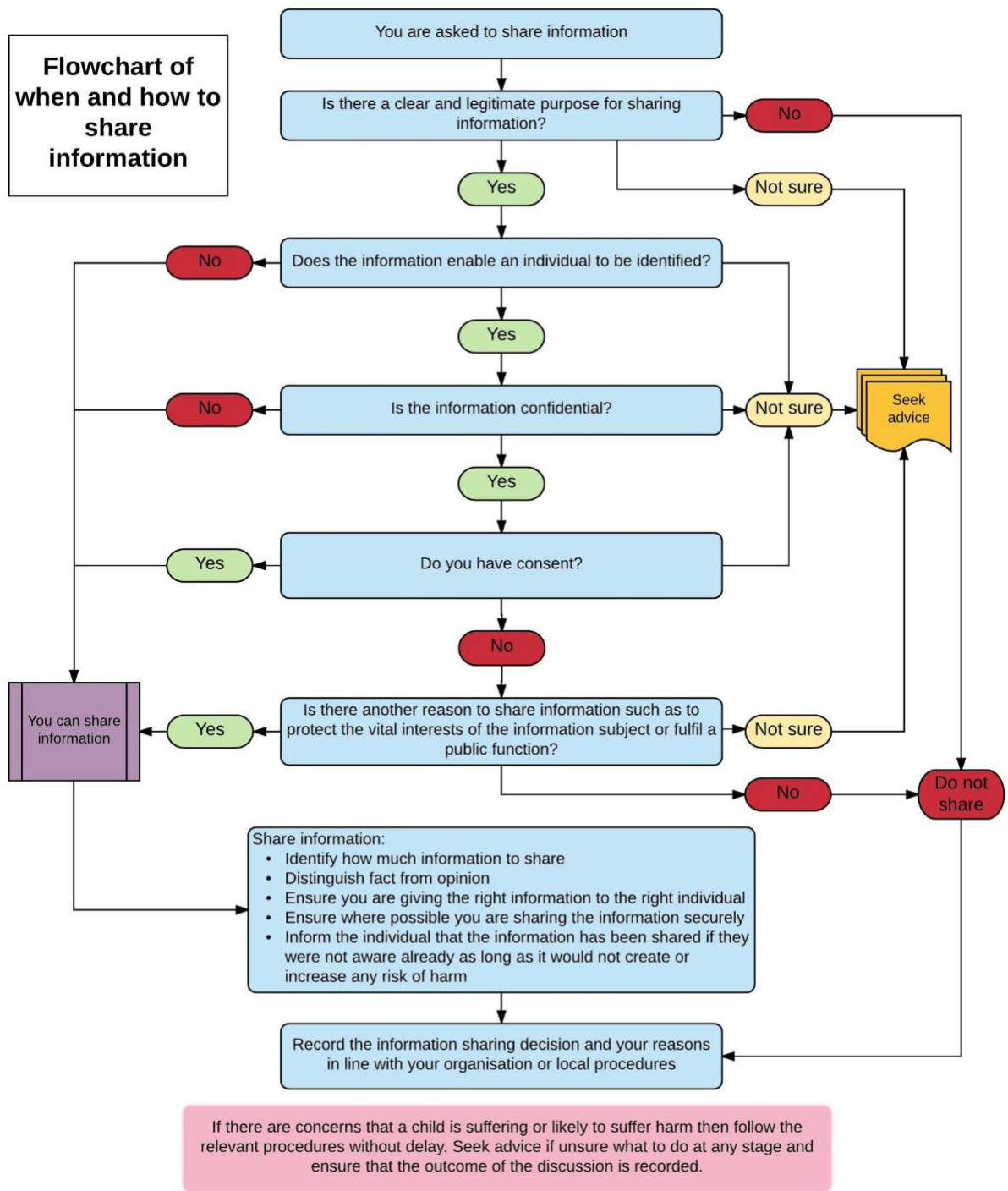
- Knowing who the Designated Safeguarding Lead is.
- Support other students and if necessary report any concerns about students welfare directly to staff.
- Not passing on unfair or unhelpful gossip.
- Encouraging others to get help and support if they are having difficulties or struggling while at College.
- Taking a friend to peer listeners or staff to talk about it if they need help to do this.

If you think have a concern or need support

Speak to **ANY** member of staff you feel comfortable talking to.

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Appendix 2 - Flowchart of key questions for information sharing



Source: Information Sharing (HM Government March 2015)