

# Information Sharing Agreement for Federations

<b>REFERENCE:</b>	Dec 2024 V1.2	<b>TITLE:</b>	Data sharing between schools within Synergy Schools Federation
<b>EFFECTIVE DATE:</b>	<b>22<sup>nd</sup> January 2025</b>	<b>REVIEW DATE:</b>	<b>December 2025</b>

Names of organisations (the Parties):	<p>Synergy Schools Federation including</p> <ul style="list-style-type: none"> <li>• Aiskew, Leeming Bar CE Primary School</li> <li>• Brompton-on-Swale Church of England Primary School (includes Busy Bees Pre-School)</li> <li>• Crakehall Church of England Primary School</li> <li>• Leeming and Londonderry Community Primary School</li> <li>• Hutton Rudby Primary School</li> <li>• Pickhill Church of England Primary School</li> </ul>
Purpose of the sharing:	<p>To ensure safeguarding of children, ensuring academic improvement and achievement, sharing of staff across sites.</p> <p>For Department of Education purposes we are funded separately and therefore classed as 6 separate schools. However, we have one shared governing body, one shared leadership team and staff operate across schools. The schools operate as one in all areas, with the exception of financial management.</p>
Why the sharing is necessary?	<p>Sharing of information across the Federation allows the schools to compare data, recognise and support educational requirements, improve teaching and learning across all schools</p> <p>Data sharing enables us to operate as a single unit. Staff at each school could potentially work across all four sites accessing staff/pupil information.</p>

Commented [AJ1]: Any text in red I've added – please can you check and amend as needed?



<p>Personal data to be shared:</p>	<p>Data to be shared across schools: Pupil files, HR files, SEN files, child protection info, single central record, staff working across sites accessing data of other schools.</p> <p>The types of personal data are:</p> <ul style="list-style-type: none"> <li><input checked="" type="checkbox"/> Name</li> <li><input checked="" type="checkbox"/> Address/postcode</li> <li><input checked="" type="checkbox"/> Date of birth</li> <li><input checked="" type="checkbox"/> Telephone number/email</li> <li><input checked="" type="checkbox"/> Emergency contact details</li> <li><input checked="" type="checkbox"/> National Insurance number</li> <li><input type="checkbox"/> NHS number</li> <li><input checked="" type="checkbox"/> Gender</li> <li><input checked="" type="checkbox"/> Images (photo/film)</li> <li><input checked="" type="checkbox"/> IP addresses</li> <li><input checked="" type="checkbox"/> Other (please state): <ul style="list-style-type: none"> <li>• Pupil educational and assessment attainment</li> <li>• Free school meal eligibility</li> <li>• Absence records, including medical records</li> <li>• Pastoral and behavioural data</li> <li>• SEN/disability information</li> <li>• Safeguarding information</li> <li>• School trips</li> <li>• Extracurricular activities</li> <li>• Breakfast and after school clubs.</li> </ul> </li> </ul>
<p>Location of the information being shared:</p>	<p>Location of Information: Scholar Pack Microsoft OneDrive Filing Cabinet in School Office CPOMS</p>



Identify the lawful basis you are relying on to share the information:	<input checked="" type="checkbox"/> (a) Consent <input checked="" type="checkbox"/> (b) Contract <input checked="" type="checkbox"/> (c) Legal obligation <input type="checkbox"/> (d) Vital interests <input checked="" type="checkbox"/> (e) Public task/interest <input checked="" type="checkbox"/> (f) Legitimate interests
If relying on legitimate interests, briefly describe the interests being pursued:	The schools rely on a number of legal bases for sharing data. We effectively operate as one organisation with staff working across sites under one management team. Pupil progress is tracked from age 2 to 11 across the Federation with planning undertaken as one team. There may be some limited circumstances where the other legal bases do not apply. In this case, the data is shared under the legitimate interests of the schools to facilitate and coordinate effective, high quality and continuous educational and related activities across the schools.
Does processing involve any special category (sensitive) data?	<p>Yes</p> <p>The types of 'special category' personal data are:</p> <input checked="" type="checkbox"/> Racial or ethnic origin <input type="checkbox"/> Political opinions <input type="checkbox"/> Religious or philosophical beliefs <input type="checkbox"/> Trade union membership <input type="checkbox"/> Genetic or biometric data <input checked="" type="checkbox"/> Health (including SEN info) <input type="checkbox"/> Sex life or sexual orientation
If processing special category data, identify the UK GDPR Article 9 condition that allows this:	<input checked="" type="checkbox"/> (a) Explicit consent <input checked="" type="checkbox"/> (b) Employment, social security and social protection <input type="checkbox"/> (c) Vital interests



	<input type="checkbox"/> (d) Not-for-profit bodies <input type="checkbox"/> (e) Made public by the data subject <input type="checkbox"/> (f) Legal claims or judicial acts <input checked="" type="checkbox"/> (g) Reasons of substantial public interest <input checked="" type="checkbox"/> (h) Health or social care <input checked="" type="checkbox"/> (i) Public health <input type="checkbox"/> (j) Archiving, research and statistics
If you have relied upon (b), (g), (h), (i) or (j) above, please also state which Schedule 1 condition you are relying on:	<ul style="list-style-type: none"> <li>• (b): DPA '18 Schedule 1, Part 1, Condition 1: Employment, social security and social protection; and Condition 3: Public Health.</li> <li>• (g): DPA '18 Schedule 1, Part 2, Condition 6: Statutory and Government Purposes; Condition 8: Equality of opportunity or treatment; Condition 16: Support for individuals with a particular disability or medical condition; and Condition 18: Safeguarding of children and of individuals at risk.</li> </ul>
Are you sharing any criminal conviction information?	Yes, DBS checks are shared data within the Federation.
What Schedule 1 condition is relied upon for this?	DPA '18 Schedule 1, Part 2, Condition 6: Statutory and government purposes; Condition 10: Preventing or detecting unlawful acts; Condition 18: Safeguarding of children and of individuals at risk.
What are the arrangements for providing privacy information to individuals?	Privacy Notices are provided on each school's website.
Has each school within the Federation completed a DPIA for this sharing?	<p>No</p> <p>Reason: the risk threshold is not met.</p> <p>DPO's view: a DPIA is not mandatory or necessary in the circumstances. Although some sensitive data is being shared, processing is for the ordinary school purposes that data subjects would reasonably expect. The schools within</p>



	the Federation have equivalent data protection standards and are subject to the same requirements around information security and confidentiality.
If a DPIA was conducted, what was the outcome?	N/A.
Are there any circumstances in the proposed sharing that might result in a risk to individuals?	No specific risks have been identified that go beyond the privacy risks that would apply to each school individually.
Where risks to individuals have been identified, how will you mitigate those risks?	Staff are aware that they should access personal data on a 'need to know' basis and standard access controls and other information security measures are in place within the Federation.
What arrangements are in place to comply with the duty of confidentiality?	All schools' staff are made aware of the need to keep personal information confidential, unless required to disclose by law.
What arrangements are there for complying with individuals' information rights?	<p>Note: the UK GDPR provides the following rights for individuals:</p> <ul style="list-style-type: none"> <li>• The right to be informed</li> <li>• The right of access</li> <li>• The right to rectification</li> <li>• The right to erasure</li> <li>• The right to restrict processing</li> <li>• The right to data portability</li> <li>• The right to object</li> <li>• Rights in relation to automated decision making and profiling.</li> </ul> <p>Requests under this legislation should be made in writing to Mr M White, Executive Headteacher.</p> <p>To comply with individuals' rights in respect of their personal data, the schools within the Federation provide details of a point of contact within the school on their Privacy Notices who data subjects can contact for any queries they have. The schools' DPO details are also included on privacy notices so that data</p>



	subjects can contact the DPO to make any requests and the DPO will assist the Federation to comply with the request or respond appropriately.
Explain how the data will be transferred securely between the schools:	The data will be transferred via password protected access or transmission using encryption.  Access to paper files is on a 'need to know' basis.
Outline the technical and organisation security measures that the schools will put in place to ensure data is processed and held securely.	Access controls are limited to administrators and Heads of School/Headteachers or the IAO.  All schools follow the Information Policy and Information Security Incident Reporting Policy.  Measures to protect the information from inappropriate disclosure or a breach of security include access controls and security credentials of IT systems used.
How will the schools ensure that data is accurate and up to date?	Administrators regularly review the data in line with the Records Management Policy, Archive Policy and Information Policy.  The schools are jointly responsible for keeping personal data accurate and up to date by amending the relevant file or system when the school is aware that something has changed.
Provide details of data breach arrangements.	Each School has an Information Security Incident Reporting Policy and data breaches will be managed in accordance with this policy. The parties will manage breaches together in relation to shared personal data.
Will third parties be used by any of the schools to process the personal data being shared?	Yes  Contracting arrangements: Contractors will be checked against the contract assurance document on the Veritau Portal to ensure the contract contains the data processing terms required by law. For contractors that are not on the assurance document, the schools must check the contract or Terms and Conditions against the contracts checklist, also on the Veritau Portal.



What arrangements are in place for retention and erasure of the information?	The schools envisage the information being shared for the duration of the Federation and records will be retained in accordance with the legal requirements and the Retention Schedule contained in the IRMS Schools Toolkit. Secure disposal of data at the end of its retention period will be by deletion from the relevant IT system or application; or shredding of paper records.
In respect of the data sharing, has the Data Protection Officer (DPO) been consulted and their views considered?	Yes  DPO's recommendation: The proposed data sharing is acceptable, so long as there are sufficient access controls and other technical and organisational security measures.
Arrangements for review of this Agreement:	This agreement will be reviewed by the Executive Headteacher & Governing Body every 2 years.
Date of termination of the Agreement:	This agreement will terminate when a school leaves the Federation, or the Federation is terminated.
Signed on behalf of each school within the Federation:	Name of signatory: Mr Mike White Signing on behalf of Synergy Schools Federation Position: Executive Headteacher, Synergy Schools Federation Date: 22 <sup>nd</sup> January 2025  Name of signatory: Mrs B Stanley Signing on behalf of Aiskew Leeming Bar & Leeming & Londonderry Primary Schools Position: Headteacher Date: 22 <sup>nd</sup> January 2025  Name of signatory: Mr Adam Firmin Signing on behalf of Brompton-on-Swale CE Primary School Position: Head of School Date: 22 <sup>nd</sup> January 2025



	<p>Name of signatory: Mrs Nicole Rayer Signing on behalf of Crakehall CE Primary School &amp; Pickhill CE Primary School Position: Head of School Date: 22<sup>nd</sup> January 2025</p> <p>Name of signatory: Mr R Johnson Signing on behalf of Hutton Rudby Primary School Position: Headteacher Date: 22<sup>nd</sup> January 2025</p>
<p>By signing this Agreement above, the Parties agree that data sharing and processing under this Agreement shall be carried out in accordance with this Agreement and all relevant legislation, particularly the UK General Data Protection Regulation and the Data Protection Act 2018.</p>	

