Wales Accord on the Sharing of Personal Information

Information Sharing Protocol for NEET Multi Agency Service, Cardiff

Cardiff
Caerdydd

Version: [Insert details here]

Further information on how an ISP should be developed
within the WASPI framework is contained within Section 1 of the

Guidance on the Development of an Information Sharing Protocol

Further guidance may be sought from the
WASPI Service Integration and Development Team at:

www.waspi.org

Note: This page can be removed once the ISP development has commenced

Contents

1   Introduction to this ISP

1.1   This Information Sharing Protocol (ISP) is supplementary to the Wales Accord on the Sharing of Personal Information (WASPI), and has been agreed between the participating partner organisations. Partners have given consideration to its contents when drawing up this document.

1.2   This ISP has been prepared to support the regular sharing of personal information for the purpose of reducing the number of young people not in Education, Employment or Training in Cardiff.

1.3   This ISP has been prepared to support the Cardiff Youth Engagement Strategy. This is led by the City of Cardiff Council and covers a wide range of organisations.

It provides early intervention preventative support to young people who are at risk of disengagement from education, employment or training (EET), and also support for post16s who are not in education, employment or training (NEET), in order for them to make positive progress with their lives. The purposes for sharing information between organisations are:

- Identifying young people most at risk of disengagement from both pre and post 16 provisions.

- Better brokerage and co-ordination of the support to young people who are NEET or at risk of becoming NEET.

- Stronger tracking and effective transition of young people through the stages of education, training and employment

- Ensuring provision meets the needs of young people.

- Strengthening employability skills and opportunities.

- Greater accountability for better outcomes for young people.

1.4   This ISP covers the exchange of information services in the Local Authority, secondary schools, colleges, post 16 learning providers, third sector organisations and Careers Wales.

1.5   It supports the information sharing partner organisations involved and the groups of service users it impacts upon. It details the specific purposes for sharing and the personal information being shared, the required operational procedures, consent processes, and legal justification.

1.6   This ISP should be read in conjunction with 'Cardiff Commitment, Ensuring positive destinations for young people in Cardiff' and the Cardiff's Youth Engagement and Progression Action Plan which will deliver the strategy and the terms of reference for the EET Strategy.

1.7   For the purpose of this ISP, **explicit consent** is required from service users.

1.8   Partners may only use the information disclosed to them under this ISP for the specific purpose(s) set out in this document or to support the effective administration, audit, monitoring, inspection of services and reporting requirements.

1.9   A glossary of terms for this ISP is contained within Appendix A.

Please note: Staff should not hesitate to share personal information in order to prevent abuse or serious harm, in an emergency or in life-or-death situations. If there are concerns relating to child or adult protection issues, the relevant organisational procedures must be followed.

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2   The information sharing partner organisations

2.1   This ISP covers the exchange of information between practitioners of the following organisations:

Information Sharing Partner Organisations	Responsible Manager
The City of Cardiff Council	Director of Education Director of Children's Services
Local Authority Maintained Secondary Schools, Special Schools and Pupil Referral Unit (PRU) – See Appendix D	Headteachers (schools) and Teacher in Charge (PRU)
Careers Wales	Area Manager
Communities First	· C3SC – Manager · ACE – Manager · CCHA – Manager · BGR Community Development - Manager
Cardiff and Vale College	Principal
St David's College	Assistant Principal
Coleg y Cymoedd	Director of Learner Services
Cardiff Worked Based Learning	

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	· ACT Ltd – Director
	· ITEC Training Solutions Ltd - Director
Cardiff Third Sector Council	Chief Officer

2.2   The responsible managers detailed above have overall responsibility for this ISP within their own organisations, and must therefore ensure the ISP is disseminated, understood and acted upon by relevant practitioners.

2.3   The responsible manager from each partner organisation will regularly monitor and audit access to information shared under this ISP to ensure appropriate access is maintained.

3   Benefits of sharing

3.1   By sharing personal information under this ISP, it is envisaged that the following benefits will be achieved:

Improved communication amongst organisations and providers involved in supporting young people who are NEET or at risk of becoming NEET;

- Seamless multi agency service delivery (The right support at the right time by the right agency);
- Improved tracking and monitoring of potential NEETS;
- Early support and identification of young people at risk of becoming NEET 16+;
- Reduced duplication of multi agency service delivery;
- Key worker to manage multi agency interventions on service users behalf;
- Supporting better engagement and progression for all young people and contributing to higher engagement rates at 16 and 19;
- Reduction in multiple requests for information from the service user;
- Multi agency individually tailored programme of support.

Benefits for service user

- More young people in appropriate education, employment or training (EET) opportunities;
- More young people clearly progressing in their EET engagements;
- Fewer young people dropping out of EET;
- A reduction in the average time a young person is NEET;
- More support packages in place for NEET and those at risk of NEET;
- Improved services for NEETs and those at risk of NEET.

4   Legislative / statutory powers

4.1   Disclosure of information will be conducted within the legal framework of the Data Protection Act 1998 (DPA), the Human Rights Act 1998 and in compliance with the common law duty of confidence.

4.2   The conditions set out in Schedule 2 and 3 of the DPA are known as the "conditions for processing". Organisations processing personal data need to be able to satisfy one or

more of these conditions. For the purpose of this ISP, the condition that will be relied upon for both Schedules (where required) is **explicit consent**. Therefore no further conditions need to be met.

4.3   In addition to relying on consent as a Schedule condition, public bodies may have statutory requirements to share some types of personal data. In the absence of a statutory requirement, a public sector body should be able to explain the legal power it has to enable it to share. Other organisations may not need statutory powers to share.

4.4   **Learning and Skills Act 2000** - Sections 123 – 129 and Section 138 provide the framework for the sharing of information in relation to youth support services in Wales. In particular Section 126, which sets out the duties on maintained schools and institutions funded through the Welsh Government to provide relevant information. Section 138 subsection 3 lists the bodies empowered to supply relevant information about young people to a Local Authority or to any other person or body involved in the provision of youth support services.

4.5   Local authorities have powers under section 2 of the Local Government Act 2000 to promote or improve the social wellbeing of their area. This provides an implied power to share information with other statutory services and the independent sector.

4.6   Section 25 of the Children's Act 2004 provides for the co-operation of relevant partners of children's services authority in the making of arrangement to safeguard the emotional wellbeing, physical and mental health, education, protection and social and economic wellbeing of children in Wales.

4.7   Guidance provided by the Welsh Assembly Government includes *Safeguarding Children; Working Together under the Children Act 2004* (Welsh Assembly Government 2007) document. This document includes guidance for sharing information on vulnerable young people among agencies, with a focus on the role of Local Safeguarding Children Board (LSCBs).

4.8   Section 111 of the Local Government Act 1972 grants a local authority power to do anything that is calculated to facilitate, or is conducive or incidental to the discharge of any of its statutory functions and therefore implies information sharing powers.

4.9   Part 3 of the Children and Family (Wales) Measure 2010 requires that the partner agencies work together to deliver the statutory service; information sharing is expected and clearly referenced in the Regulations.

4.10   Sections 27 and 47 of the Children's Act 1989 provide implied power for information to be shared by health, social care, housing and education, to assess and provide services to children and to investigate allegations of abuse and neglect.

4.11   Careers Wales has powers under 'The Education Act 1997: Section 44' and 'The Education (Information about Individual Pupils) (Wales) Regulations 2007' to access the education records of children and young people in order to carry out its functions.

5   Details of personal information being shared

5.1   Personal information shared for the purpose of this ISP includes a range of information and will include:

- Forename, Surname;
- Age and date of birth;
- Address;
- Gender and any protected characteristics (if known);

- Status within the 5 Tier Careers Wales System (Appendix 2)
- Vulnerability Assessment Profile (VAP) Categorisation.
- Reference Number (e.g as agreed UPN,ULN or referring organisation reference code);
- Specific and additional learning needs, SEN;
- Personal Barriers or circumstances contributing to or preventing service users from entering opportunities (e.g physical or mental health, caring responsibilities pregnancy etc);
- Historic relevant information such as Education, employment, training experience, offending behaviour, family and social support.
- Current provision or programme enrolled on;
- Qualifications obtained;
- Risk factors;
- School destination data.

5.2   The information is used to identify and prioritise the young person's needs, and to allocate the appropriate multi agency services to support and report progress. Service Users will move through the specific multi agency support remits until personal barriers have been addressed. Young people will then explore and consider further learning, employment (including voluntary) or training opportunities.

5.3   Only the **minimum necessary** personal information consistent with the purposes set out in this document can be shared.

5.4   Information provided by partner organisations will not generally be released to any third party without prior consultation with the owning partner organisation.

5.5   An information reference table within Appendix B provides a comprehensive list of the personal information to be shared between the partner organisations, including with whom in each partner organisation it will be shared with, why it will be shared and the methods of how it will be shared.

6   Identifying the service user

In order to ensure that all partner organisations, when sharing information, are referring to the same service user, the following personal identifiers must be included:

- Forename
- Surname
- Address
- Date of Birth
- Service Reference Number (e.g as agreed UPN,ULN or referring organisation reference code).

7   Informing the service user

7.1   It is necessary to communicate with the service user or their lawful representatives about the need for information sharing at the earliest appropriate opportunity, preferably at first contact unless by doing so would risk harm to others or hinder any investigation or legal proceedings.

7.2   Therefore in most cases practitioners will clearly inform service users or their lawful representatives about what personal information is to be shared, and for what purposes

it will be used. Partner organisations should also ensure that service users are provided with any information they need to fully understand the way in which their personal data will be handled in any specific circumstance, including the names of any persons or organisations with whom their data may be shared.

7.3   Where appropriate, agreed methods of providing this information are:

- Education - Privacy Notices issued via schools to all parents.
- Careers Wales and the Consent Model (Appendix 4 and 5).
- Verbal communication during initial meetings.
- Participant Enrolment Form (Appendix 6)
- Organisation consent forms.
- ESF Activate registration forms.
- Cardiff and Vale College Student registration forms.

8   Obtaining consent

8.1   The approach to obtaining consent should be transparent and respect the rights of the service user.

8.2   Consent is given by a service user agreeing actively, to a particular use or disclosure of information. It can be expressed either verbally or in writing, although written consent is preferable since that reduces the scope for subsequent dispute. For the purposes of this ISP, **explicit consent** will be required from service users.

8.3   Consent must not be secured through coercion or inferred from a lack of response to a request for consent. Practitioners must be satisfied that the service user has understood the information sharing arrangements and the consequences of providing or withholding consent.

8.4   Where a service user is a child or young person, the practitioner should consider whether the child or young person has the capacity to understand the implications of giving their consent in the particular circumstance. Where the practitioner is confident that the child or young person can understand their rights, then consent should be sought from them rather than a parent. It is important that a child or young person is able to understand (in broad terms) what it means to give their consent.

8.5   Consent should not be regarded as a permanent state. Opportunities to review the service user's continuing consent to information sharing should arise during the course of the service provision. Practitioners should exercise professional judgement in determining whether it would be appropriate to re-visit a service user's continued consent at any given juncture. Ideally it should take place in the context of a review or re-assessment.

8.6   Consent obtained from service users for the purposes of this ISP will only be used to support the delivery of the purposes and functions set out in this document. Once the provision of this specific ISP concludes or the purpose changes, then consent obtained for it will also end.

8.7   In some exceptional circumstances, personal information can be lawfully shared without consent where there is a legal requirement or where an appropriate professional of sufficient seniority within the partner organisation, has taken the view that the duty of confidentiality can be breached where there is a substantial over-riding 'public interest'. Such situations where information might be shared without consent include:

- 'Life and death' situations, for example, where information is shared in an emergency in order to preserve life;
- where a person's condition indicates they may be a risk to the public or may inflict self-harm;
- in order to prevent abuse or serious harm to others;
- on a case-by-case basis, to prevent serious crime and support detection, investigation and punishment of serious crime.

This is not an exhaustive list and each situation should be considered on a case by case basis.

8.8 Where decisions are made to share personal information without the service user's consent, as detailed above in 8.7, this must be fully documented in the service user's record.

8.9 Where it is not appropriate to defer the sharing of information, then it will not be appropriate to defer consent, as consent cannot be obtained retrospectively. Therefore, only where deemed necessary, may information be shared without consent.

8.10 If there are any concerns relating to child or adult protection issues, practitioners must follow the relevant organisational procedures.

9 Obtaining consent where a service user lacks mental capacity

9.1 The Mental Capacity Act 2005 Code of Practice defines the term 'a person who lacks capacity' as a person who lacks capacity to make a particular decision or take a particular action for themselves, at the time the decision or action needs to be taken.

9.2 Whenever dealing with issues of capacity to consent, local rules and procedures should be followed and these must be in compliance with the Mental Capacity Act 2005 and its Code of Practice.

9.3 Where a person has a temporary loss of capacity consent will be deferred, if appropriate, until such time as consent can be obtained. Consent to share information will be sought when capacity is regained.

10 Recording consent

10.1 Decisions regarding service users' consent of how and when it was obtained and whether it was provided in verbal or in written form, must be stored or recorded in the service user's record.

11 Refused and withdrawn consent

11.1 A service user has the right to refuse their consent to have information about them shared. They also have the right to withdraw previously granted consent at any point, to the sharing of their information. Further personal information should not then be shared under this ISP.

11.2 Where the service user has refused or withdrawn consent, the implications of withholding consent will be clearly explained to them and this dialogue will be recorded in the service user's record. If a service user withdraws consent to share personal information it will also be explained that information already shared cannot be recalled.

12   Information security

12.1 Practitioners carrying out the functions outlined in this ISP should make themselves aware of, and adhere to, their organisation's information security policies and procedures.

12.2 Where practitioners are unable to comply with their organisation's policies regarding the safe and secure transfer of information they must ensure that a risk assessment is undertaken by their Information Security/Governance department at the earliest opportunity. Alternative secure methods, as identified within the organisation's policy, must be used until such time as the risk assessment has been undertaken.

12.3 A list of agreed methods for the safe and secure transfer of personal information is documented within Appendix B.

12.4 Any breaches of security, confidentiality and other violations of this ISP must be reported in line with each partner organisation's incident reporting procedures. Consideration should be given to share, where appropriate, the outcome of any investigation with the partner organisations involved.

13   Records management

13.1 Practitioners carrying out the functions outlined in this ISP should make themselves aware of, and adhere to, their organisation's records management procedures, specifically in relation to collecting, processing and disclosing of personal information.

13.2 All information, whether held on paper or in electronic format must be stored and disposed of in line with each partner organisation's retention and disposal schedule.

13.3 Personal information will only be collected using the agreed collection methods, ensuring the required information is complete and up-to-date.

13.4 Practitioners will ensure where practical, that records are maintained of when information is shared with a partner organisation, and to whom.

13.5 Decisions about service users should never be made by referring to inaccurate, incomplete or out of date information.

13.6 If information is found to be inaccurate, practitioners will ensure that their records and systems are corrected accordingly. Consideration must also be given to advising partner organisations where practical.

14   Data Protection Act and Freedom of Information Act requests

14.1 Where requests are received for information relating to this ISP or any individual service user(s) then each request will be dealt with in accordance with each partner organisation's relevant policies and procedures.

15   Complaints

15.1 Each partner organisation has a formal procedure by which service users, partner organisations and practitioners can direct, their complaints regarding the application of this ISP.

16   Review of this ISP

16.1 This ISP will be reviewed annually in the first instance or sooner if appropriate and every 2 years thereafter.

17   Appendix A – Glossary of Terms

Term	Definition
Consent	An informed indication by which the service user signifies agreement and understanding of how personal information relating to them is processed.
Personal information	Information which relates to an individual, including their image or voice, which enables them to be uniquely identified from that information on its own or from that and / or other information available to that organisation. It includes personal data within the meaning of Section 1 of the Data Protection Act 1998 and information relating to the deceased.
Sensitive personal information	Personal information as to; the racial or ethnic origin of an individual; their political opinions, their religious beliefs or other beliefs of a similar nature, whether they are a member of a trade union, their physical or mental health or condition, their sexual life, the commission or alleged commission by them of any offence, or any proceedings for an offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings.
Personal identifiers	A set of basic personal details that allow partner organisations to identify exactly who is being referred to. For example, name, address, date of birth, post code.
Processing personal information	Broadly describes the collecting, using, disclosing, retaining or disposing, of personal information. If any aspects of processing are found to be unfair, then the Data Protection Act 1998 is likely to be breached.
Service user	An inclusive term to describe those people who have contact with service providing organisations within Wales and have information recorded about them. For example: individual organisations may refer to these people as data subjects, patients, clients, lawful representatives, etc.
Practitioner	An inclusive term to describe any staff working for the partner organisations involved in the care of or provision of services for the service user. For example: police officer, health professional, social worker, volunteer etc.
Responsible Manager	A senior manager within an organisation who has overall responsibility for the area of work related to a specific ISP. It will be their responsibility to ensure that ISPs are disseminated, understood and acted upon by relevant practitioners and that access to personal information is regularly monitored and audited to ensure appropriate access is maintained.
NEET	A young person aged 16 to 24 who is not in education, employment or training, is considered to be NEET.
EET	A young person who is in education, employment or training, is considered to be EET.

At Risk of NEET	A young person who, for various reasons, could easily disengage from education and learning, is considered to be at risk of NEET
VAP	The pupil vulnerability assessment profile is a tool which measures the vulnerability of children and young people in Cardiff, based on schools data. To assist youth work organisations with the targeting of those most at risk of NEET, each young person is given a RAG status (red, amber, green) that visually highlights their vulnerability score.
Cardiff and Vale College (CAVAC)	All college campus' across Cardiff including subsidiary venues utilised in provision.
Coleg Y Cymoedd	All college campus' across RCT including subsidiary venues utilised in provision
Lead Worker	Provides tailored support to young people living in Cardiff aged 16 - 24 years who are vulnerable to, or have disengaged from education, employment or training to enable them to achieve their full potential. The focus of this support is on increasing engagement in training, learning, volunteering and work opportunities and the removal of barriers young people face in order to increase skill and understanding with the overarching goal of engagement and empowerment in decision making whilst providing pre-engagement information and guidance and motivation
ITEC Training Solutions	Work based learning provider delivering funded skills and employability services through Cardiff
ACT Training	Work based learning provider delivering funded skills and employability services through Cardiff
Communities First	Communities First is a community focussed programme that supports the Welsh Government's Tackling Poverty agenda

18   Appendix B – Information Reference Table

The sharing of personal information to support the provision of Cardiff Youth Engagement Strategy			
Description	**001**	**002**	**003**
1 **Information exchange** General description of the process or stage to which the information exchange relates.	All organisations involved in supporting young people into, and providing education, employment and training Post 16 to provide Careers Wales with information on all young people who have received offers with their service/organisation. This will facilitate the sharing of agreed data as part of the identification, monitoring and tracking of young people who are at risk of disengaging or have become disengaged (11-24) and whose destination is or becomes unknown and to explore current position, barriers to engagement and nominated plan to engage Monthly status reports (5 Tier model) shared from Careers Wales to EPC. Post 16 - this information shared with Neighbourhood Youth Engagement Panel Chairs and discussed at monthly multi-agency meetings to. Those appearing not to be engaging with Careers Wales Services will be allocated a relevant partnership lead worker Pre -16 – sharing information from the VAP to identify if the young person is at risk of disengagement to ensure appropriate support is agreed and put in place.	The EPC will provide Education and Lifelong Learning directorate, the Youth Service and Communities First with details of appropriate Tier 1 and Tier 2 young people to ensure response meets needs and is not duplicated. They will subsequently provide the EPC with monthly updates on any young person referred in Tier 1 and Tier 2. The lead worker will capture the outcomes of the diagnostic assessment. They will cross reference support if other agencies are identified as being involved with an individual and call a case conference where necessary. The lead worker will work with the learner to form an action plan in order to support them to progress into Education, Employment or Training. The progress being made with the learner and any barriers encountered will be reviewed in the neighbourhood panel meeting on a monthly basis.	The Engagement and Progression Co-ordinator will provide Careers Wales with monthly updates for those young people followed up in Tiers 1 and 2. FE and WBLA will provide Careers Wales with updates on a monthly basis young people disengaging or at risk of disengaging from provision/placements as well as information of those learners in tier 5 for Destinations purposes). Communities First will provide information on young people entering EET/Tier 5. All partners will share information as and when required to ensure appropriate service responses are made available to provide additional support.
2 **What information will be shared?**	Full name of young person; address; age and date of birth; gender and any		

Description of the information to be provided. **Please note**: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.	protected characteristics (if known) Status within the 5 Tier Careers Wales System Current provision or programme enrolled on. Vulnerability Assessment Profile (VAP) Categorisation. Reference Number (e.g as agreed UPN,ULN or referring organisation reference code); Current and previous involvement with agencies and partner organisations. Specific and additional learning needs, SEN. Personal Barriers or circumstances contributing to or preventing service users from entering opportunities (e.g physical or mental health, caring responsibilities pregnancy etc). Historic relevant information such as Education, employment, training experience, offending behaviour, family and social support. Qualifications obtained. Risk factors. School destination data	Full name of young person; address; age and date of birth; gender and any protected characteristics (if known) Status within the 5 Tier Careers Wales System Current provision or programme enrolled on. Vulnerability Assessment Profile (VAP) Categorisation. Reference Number (e.g as agreed UPN,ULN or referring organisation reference code); Current and previous involvement with agencies and partner organisations. Specific and additional learning needs, SEN. Personal Barriers or circumstances contributing to or preventing service users from entering opportunities (e.g physical or mental health, caring responsibilities pregnancy etc) Historic relevant information such as Education, employment, training experience, offending behaviour, family and social support. Qualifications obtained. Risk factors. School destination data	Full name of young person; address; age and date of birth; gender and any protected characteristics (if known) Status within the 5 Tier Careers Wales System Current provision or programme enrolled on. Vulnerability Assessment Profile (VAP) Categorisation. Reference Number (e.g as agreed UPN,ULN or referring organisation reference code); Current and previous involvement with agencies and partner organisations. Specific and additional learning needs, SEN. Personal Barriers or circumstances contributing to or preventing service users from entering opportunities (e.g physical or mental health, caring responsibilities pregnancy etc) Historic relevant information such as Education, employment, training experience, offending behaviour, family and social support. Qualifications obtained. Risk factors. School Destination data
3 **Consent to share**		Carried over - consent ongoing	Carried over - consent ongoing

| Details of when and how consent will be sought. | Careers Wales would gain consent to share information with partner organisations prior to the learner leaving school in relation to their status of engagement.

The lead worker will gain written or verbal consent in relation to the casework allocation on a neighbourhood basis to enable support to re-engage and sustain in Education, Employment or Training.

All young people will be asked to sign EET Consent form - Appendix F or an individual organisational 'consent to share' form that is compliant with the DPA.

In situations where it is not possible to gain consent a note will be held against the learners record to evidence this and no further intervention will take place in relation to this Youth Engagement Neighbourhood agenda.

Consent will also be contained within individual organisation enrolment, application and regisatration forms. | | | | | |

Description		001		002		003

4	**Partner Organisation(s)**	**Who by**	**Who to**	**Who by**	**Who to**	**Who by**	**Who to**
a	Details of provider and recipient organisation(s).	1. **The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorate	1.**The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorate	1. **The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorate	1. **The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorate	1. **The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorate	1.**The City of Cardiff Council** 1.1 Education and Lifelong Learning Directorates

	Who by	Who to	Who by	Who to	Who by	Who to
b	1.2 Children's Services Directorate 2.Cardiff Schools, PRU and EOTAS (see appendix 3) 3.Careers Wales 4.Communities First 5.Colleges 5.1Cardiff and Vale College 5.2 Coleg y Cymoedd 5.3 St David's College 6. Work Based Learning Providers 6.1 ACT 6.2 ITEC 7. Third Sector Organisations	2 Careers Wales	2. Careers Wales 3. Communities First	1.2 Children's Services Directorate 2. Cardiff Schools, PRU and EOTAS (see appendix 3) 3.Careers Wales 4.Communities First 5.Colleges 5.1 Cardiff and Vale College 5.2 Coleg y Cymoedd 5.3 St David's College 6. Work Based Learning Providers 6.1 ACT 6.2 ITEC 7. Third Sector Organisations	1.2 Children's Services Directorate 2. Cardiff Schools, PRU and EOTAS (see appendix 3) 3. Careers Wales 4.Communities First 5.Colleges 5.1 Cardiff and Vale College 5.2 Coleg y Cymoedd 5.3 St David's College 6. Work Based Learning Providers 6.1 ACT 6.2 ITEC 7. Third Sector Organisations	1.2 Childrens Services Directorates 2. Communities First 3. Careers Wales 4.Cardiff and Vale College 5.Work Based Learning Providers – ACT, ITEC 6. Third Sector Organisations

Role(s) of staff responsible for providing and receiving the information.	1. The City of Cardiff Council Staff	1. The City of Cardiff Council Staff	1. The City of Cardiff Council staff	1. The City of Cardiff Council staff	1. The City of Cardiff Council staff	1. The City of Cardiff Council staff
	1.1 Engagement and Progression Co-ordinator	*1.1 Youth Prevention and Engagement Team Leaders*	*1.1 Engagement and Progression Co-ordinator*	*1.1 Engagement and Progression Co-ordinator*	*1.1Engagement and Progression Co-ordinator*	*1.1 Engagement and Progression Co-ordinator*
	1.2 Youth Workers	*1.2 Nominated Key Worker*	*1.2 Youth Workers*	*1.2 Youth Workers*	*1.2 Youth Workers*	*1.2 Director of Education and Lifelong Learning*
	1.3 Youth Mentors	*1.3 Youth Mentor*	*1.3 Youth Mentors*	*1.3 Youth Mentors*	*1.3 Youth Mentors*	*1.3 Director of Children's Services*
	1.4 LACE Education Co-ordinator	*1.4 Youth Workers*	*1.4 LACE Education Co-ordinator*	*1.4 LACE Education Co-ordinator*	*2.1 LACE Education Co-ordinator*	*1.4 Education Managers*
	1.5 Social Workers	*1.5 Education Welfare Officers*	*1.5 Social Workers*	*1.5 Social Workers*	*2.2 Social Workers*	*1.5 Head teachers*
	1.6 Youth Offending Workers	**2. Careers Wales**	*1.6 Youth Offending Workers*	*1.6 Youth Offending Workers*	*1.6 Youth Offending Workers*	*1.6 Youth Service Managers*
	1.7 EOTAS Co-ordinator	*2.1 Area Manager*	*1.7 EOTAS Co-ordinator*	*1.7 EOTAS Co-ordinator*	*1.7 EOTAS Co-ordinator*	**2 Careers Wales**
	1.8 School Staff	*2.2 Careers Advisers*	*1.8 School Staff*	*1.8 School Staff*	*1.8 School Staff*	*2.1 Area and Locality Managers*
	1.9 PRU Staff		*1.9 PRU Staff*	*1.9 PRU Staff*	*1.9 PRU Staff*	
	1.10 Education Welfare Officers		*1.10 Education Welfare Officers*	*1.10 Education Welfare Officers*	*1.10 Education Welfare Officers*	CollegesCollege Principals
	1.11 Operation Manager Youth Service		*1.11 Operation Manager Youth Service*	*1.11 Operation Manager Youth Service*	*1.11 Operation Manager Youth Service*	WBLA Managers
	1.12 Operation Manager 14-19		*1.12 Operation Manager 14-19*	*1.12 Operation Manager 14-19*	*1.12 Operation Manager 14-19*	Community First Leads
	1.13 Youth Development Officers 11-25		*1.13 Youth Development Officers 11-25*	*1.13 Youth Development Officers 11-25*	*1.13 Youth Development Officers 11-25*	
			1.14 Performance Manager (Education)			

	1.14 Performance Manager (Education) **2 Careers Wales** 2.1 Area Manager Careers Wales 2.2 Careers Advisers **3.Communities First** 3.1 CCHA Cluster Manager/youth Mentors 3.2 C3SC Cluster Manager 3.3 BRG Cluster Manager 3.4 ACE Cluster Manager **4. Colleges** 4.1 Principal CAVC 4.2 Enrolment Officer CAVC 4.3 Social Engagement and		**2. Careers Wales** 1.1 Area Manager Careers Wales 1.2 Careers Advisers **3. Communities First** 3.1 CCHA Cluster Manager/Youth Mentors 3.2 C3SC Cluster Manager 3.3 BRG Cluster Manager 3.4 ACE Cluster Manager **4. Colleges** 4.2 Principal CAVC 4.3 Enrolment Officer CAVC 4.4 Social Engagement and Collaboration Manager CAVC 4.5 Director of Learner	*1.14 Performance Manager (Education)* **2. Careers Wales** 2.1 Area Manager Careers Wales 2.2 Careers Advisers **3. Communities First** 3.1 CCHA Cluster /Youth Mentors 3.2 C3SC Cluster Manager 3.3 BRG Cluster Manager 3.4 ACE Cluster Manager **4. Colleges** 4.1 Principal CAVC 4.2 Enrolment Officer CAVC 4.3 Social Engagement and	1.14 Performance Manager (Education) **2.Careers Wales** 2.1 Area Manager Careers Wales 2.2 Careers Advisers **3.Communities First** 3.1 CCHA Cluster Manager/Youth Mentors 3.2 C3SC Cluster Manager 3.3 BRG Cluster Manager 3.4 ACE Cluster Manager **4. Colleges** 4.1 Principal CAVC 4.2 Enrolment Officer CAVC	

		Collaboration Manager CAVC 4.4 Director of Learner Services Coleg Y Cymoedd 4.5 College Staff 4.6 Assistant Principal St David's College **5. Work Based Training Providers** 5.1 Traineeship Manager ACT 5.2 Manager ACT 5.3 Traineeship Manager ITEC 6. **Cardiff Third Sector** 6.1 Project Workers		Services - Coleg Y Cymoedd 4.6 College Staff 4.7 Assistant Principal St David's College **5. Work Based Training Providers** 5.1 Traineeship Manager ACT 5.2 Manager ACT 5.3 Traineeship Manager ITEC 6. **Cardiff Third Sector** 6.1 Project Workers	Collaboration Manager CAVC 4.4 Director Of Learner Services - Coleg Y Cymoedd 4.5 College Staff 4.6 Assistant Principal St David's College **5. Work Based Training Providers** 5.1 Traineeship Manager ACT 5.2 Manager ACT 5.3 Traineeship Manager ITEC **6. Cardiff Third Sector** 6.1 Project Workers	4.3 Social Engagement and Collaboration Manager CAVC 4.4 Director of Learner Services - Coleg Y Cymoedd 4.5 College Staff 4.6 Assistant Principal - St David's College 5 **Work Based Training Providers** 5.1 Traineeship Manager ACT 5.2 Manager ACT 5.3 Traineeship Manager ITEC 6. **Cardiff Third Sector** 6.1 Project Workers	

5	**Form title and reference number** Detail the title and reference number of any form(s) or letter(s) used to collect and / or convey the information.	Youth Service Referral Form (appendix G) Careers Wales – IO System recording information on young people in line with 5 tier model and actions agreed at Neighbourhood Panel Meetings Youth Service MIS System to record interventions with young people VAP	Youth Service Referral Form (appendix G) Careers Wales – IO System recording information on young people in line with 5 tier model and actions agreed at Neighbourhood Panel Meetings Youth Service MIS System to record interventions with young people VAP Meeting Minutes and Agendas	Youth Service Referral Form (appendix G) Careers Wales – IO System recording information on young people in line with 5 tier model and actions agreed at Neighbourhood Panel Meetings Youth Service MIS System to record interventions with young people VAP Meeting Minutes and Agendas
6	**How will the information be transferred?** Detail all agreed secure methods in which the information can be transferred to the recipient e.g. fax, direct feed from system, verbal transfer at team meeting, telephone call, e-mail.	Manual documentation; hard copies shared through the monthly meetings disposed of (shredded) post meeting and up-dated on password protected spreadsheets. Secure Email Telephone Calls. Face to face monthly (post 16) and termly (pre 16) multi agency meetings. ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures	Manual documentation; hard copies shared through the monthly meetings disposed of (shredded) post meeting and up-dated on password protected spreadsheets. Secure Email Telephone Calls. Face to face monthly (post 16) and termly (pre 16) multi agency meetings. ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures	Manual documentation; hard copies shared through the monthly meetings disposed of (shredded) post meeting and up-dated on password protected spreadsheets. Secure Email Telephone Calls. Face to face monthly (post 16) and termly (pre 16) multi agency meetings. EET Strategy group. ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures
7	**When will it be shared?** Details of when the information needs to be exchanged or shared e.g. daily, weekly, monthly, yearly, as and when necessary.	Monthly sharing of Careers Wales Tier Data. Termly for sharing at VAP data. Monthly multi-agency meetings. At the point of disengagement or on request by providers as listed above when young people who are at risk of disengaging or have become disengaged. As and when required.	Monthly sharing of Careers Wales Tier Data. Termly for sharing at VAP data. Monthly multi-agency meetings. At the point of disengagement or on request by providers as listed above when young people who are at risk of disengaging or have become disengaged. As and when required.	Monthly sharing of Careers Wales Tier Data. Monthly multi-agency meetings. Termly for sharing at VAP data. At the point of disengagement or on request by providers as listed above when young people who are at risk of disengaging or have become disengaged.

				As and when required.
8	**Additional considerations** Issues or comments not included (where appropriate).	Storage of information will be subject to the following data handling / retention policies: Retention Guidelines for Local Authorities, with specific reference to: Process involving individual case management of services or support to youth. Destroy **25** years from D.O.B. or destroy **10** years from last contact.		

Appendix C – Youth Engagement and Progression Implementation Plan (WG2013)

Careers Wales five tier model of engagement (for post-16) and allocation of lead workers

Tier	Client group	Lead worker
Tier 5 Young People in Further Education, Employment or Training (EET)	• Sustaining education, employment or training (EET). • Working or studying part time over 16 hours. • Voluntary Work.	• No lead worker is judged necessary given that young person is already engaged and not judged to be at risk of disengaging.
Tier 4 Young People at risk of dropping out of EET	• Those engaged in less than 16 hours of EET. • Those who have been identified at risk of disengagement pre-16 and/or were judged as at risk of not making a positive transition who are subsequently in FE, sixth form or training. • Those who have been made aware to CW by EET providers (or themselves) as at risk of dropping out of EET.	•Allocation of lead worker depends on level of risk. • Low and medium risk – provider pastoral systems and/or allocation of learning coach as a lead worker. • High risk – may be allocated lead worker from either Youth Service or Careers Wales or if Families First involved Team Around the Family will decide allocation of lead worker.
Tier 3 Unemployed 16 and 17 year olds known to Careers Wales	• Engaged with CW and/or known to be actively seeking EET; either ready to enter EET, or assessed as requiring career management or employability skills support to enter EET. • This tier should also include those known to CW, actively seeking EET but not requiring CW enhanced support i.e. accessing support via CW.com, awaiting a college start date etc.	• Lead worker identified for 100% cohort. • Careers Wales will provide the lead worker in nearly all cases.
Tier 2 Unemployed 16 and 17 year olds, known to Careers Wales, who are not available for EET	• Young person not available/ unable to seek EET (sickness, young carers, pregnancy, custody). • Young people with significant or multiple barriers requiring intensive personal support.	• Lead worker identified for 100% cohort. • Youth Service will provide lead worker in nearly all cases.
Tier 1 Unknown status on leaving Careers Wales services	• Young people unknown to Careers Wales.	• Once individuals are identified they are allocated to appropriate tier and allocated a lead worker accordingly.

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Issue Date: Quality Assurance Date:
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6 Appendix D – List of Secondary Schools

List of Secondary Schools

School	Responsible Person
The Bishop of Llandaff CIW High School	Head teacher
Cantonian High School	Head teacher
Cardiff High School	Head teacher
Cathays High School	Head teacher
Corpus Christi RC High School	Head teacher
Fitzalan High School	Head teacher
West Federation - Glyn Derw & Michaelston Community College	Head teacher
Llanishen High School	Head teacher
Mary Immaculate High School	Head teacher
Radyr Comprehensive School	Head teacher
Eastern High	Head teacher
St Illtyd's RC High School	Head teacher
St Teilo's Chuch in Wales High School	Head teacher
Whitchurch High School	Head teacher
Willows High School	Head teacher
Ysgol Gyfun Bro Edern	Head teacher
Ysgol Gyfun Glantaf	Head teacher
Ysgol Gyfun Plasmawr	Head teacher
Greenhill Special School	Head teacher
EOTAS Pathways	Achievement Leader - Behaviour Support
Bryn Y Deryn Pupil Referral Unit	Teacher in Charge
Woodlands High School	Head teacher
Ty Gwyn School	Head teacher

7 Appendix E – Careers Wales and the Consent Model

As referenced in section 1.7, for the purposes of this ISP explicit consent is required from service users.

There is an exception to this requirement.

The ISP documents and supports the sharing of information between Careers Wales and a range of other partners involved in providing services to children and young people for the purposes of reducing the risk of them becoming NEET (Not in Employment, Education or Training), and / or in supporting those who are NEET.

Careers Wales has powers under 'The Education Act 1997: Section 44' and 'The Education (Information about Individual Pupils) (Wales) Regulations 2007' to access the education records of children and young people in order to carry out its functions. Moreover, Welsh Government guidance on the Youth Engagement and Progression Framework (YEPF) provides examples of how Careers Wales should work with partners to help 14 – 25 year olds gain and sustain employment, education and training, which includes the sharing of information to facilitate these outcomes.

It is not practical for Careers Wales to obtain the explicit consent of children and young people to refer information to other service providers. This is because of the scale of Careers Wales' work with young people and adults in education and the labour market, and the often transient nature of clients who are NEET, or at risk of becoming NEET. In the light of this, Careers Wales relies on implied consent. In general terms, implied consent is given when a service user takes some action in the knowledge that, in so doing, he or she has incidentally agreed to a particular use or disclosure of information.

The specific working practice of Careers Wales is to write to young people in Year 9 in mainstream education to explain that it holds information about them and that it may share specified 'personal information' about them with partners who may be able to help them in managing their career ideas and plans. In special schools, this information is supplied to the parents of pupils in Key stage 3. Via this process, Careers Wales provides a mechanism for its service users to opt-out of this data sharing and the process is replicated with all previously unknown clients who may thereafter seek services from Careers Wales. Careers Wales is content that if service users do not use the opt-out they can be considered to have given implied consent to their information being shared for the purposes described.

Careers Wales will not share with partners the personal information of individuals who have invoked the opt-out option.

The consequence of using implied consent is that Careers Wales is unable to share the 'sensitive personal data' (as defined by section 2 of the data protection act 1998) of service users until such time as a service user has given explicit consent.

8 Appendix F – Careers Wales Client Information form

GyrfaCymru
Careers Wales

CIF 2013

CLIENT INFORMATION FORM

Please complete all the sections below

CLIENT DETAILS:

First Name_____   Surname_____

Address_____

_____

Post Code_____   Date of Birth_____

Telephone_____   Mobile number_____

Email_____

National Insurance Number_____

Male / Female (please circle)

Age: (please tick)

16-17
18-24
25+

Do you have access to IT/ Internet?

To ensure we refer you to the most appropriate service please complete the following questions

1) Are you currently..............

In education or training
Employed full time
Employed under 16hrs
Unemployed
Redundant in last 6 months
Under notice of redundancy

On the Work Programme *(over 18s only)*
Been on Work Programme in last 6 months

2) What would you like us to help you with today?

_____
_____
_____

PTO

GyrfaCymru
Careers Wales

CIF 2013

Ethnic Origin:

Asian/ British - Bangladeshi
Asian/ British – Indian
Asian/ British - Pakistani
Asian/ British – Any other
Black/ British – Somali
Black/ British – African
Black/ British – Caribbean
Black/ British – Other
Chinese
Other ethnic group
Mixed – White & Asian
Mixed – White/ Black African
Mixed – White/ Black Caribbean
Mixed – Any other
White - British
White – Irish
White – Any other
Prefer not to say

Do you have a disability?

Yes ☐   No ☐   I'd prefer not to say ☐

Where were you referred from? ....

Careers Wales is committed to protecting your personal information and complying with the Data Protection Act (DPA). We only ask for information we need to help provide you with up to date, impartial careers information, advice and guidance. To progress your career plans, we may also share this information with partner organisations and employers. Please sign below to show that you agree with this. For further details on the DPA please see http://www.ico.gov.uk. Our registration number is: Z637134X.

I agree that my information can be shared with other organisations:

Signature_____

Date_____

OFFICE USE ONLY

IO Reference No:

PTO

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9 Appendix G – Youth Service Referral form

REGIONAL PROGRAMME:	Date Enrolled:	Quarter Enrolled:
80928		

Inspire 2 Achieve

PARTICIPANT ENROLMENT FORM

(This document is available in Welsh/ Mae'r ddogfen hon ar gael yn Gymraeg)

Joint Beneficiary:		Unique Learner No.:		Participant ID:	

Personal Details

Title		Family Name / Surname		Given Name(s)	

Address 1

Address 2

Town

County   Postcode

Telephone No.   1.   2.

Email Address

Gender:	Date of Birth:	NI Number:

Female

Male

On EIT (evidence) and most at risk of becoming NEET?   Yes   No

EIT Score:

In Full time Education/Training (16 hours plus)	Yes	☐	No	☐

Name of School / College / Training Provider:	
Address 1	
Address 2	
Town/City	
County	Post Code

Qualifications – What is the highest qualification you hold at present?

No qualifications	☐	Below CQFW Level 1	☐
CQFW level 1		CQFW level 2	
CQFW level 3		CQFW level 4	
CQFW level 5 or above	☐		

Household/Family information

Is there only one adult in your household?	Yes ☐	No ☐
Is anyone in your home working?	Yes ☐	No ☐
Are you currently homeless or at risk of becoming homeless?	Yes ☐	No ☐

Are you a primary carer of any of the below?

Children under 18	Yes ☐	No ☐	Disabled Adult 18+	Yes ☐	No ☐
Older person/people (65+)	Yes ☐	No ☐			

Do you have a work limiting health condition?   Yes ☐   No ☐

Preferred Language

Welsh ☐   English ☐   Other ☐

REGIONAL PROGRAMME:	Date Enrolled:	Quarter Enrolled:
80928		

Joint Beneficiary:		Unique Learner No.:		Participant ID:	

Declaration

I declare that the details given on this form are to the best of my knowledge accurate and true.

I am aware that this project is part financed by the European Union through the Welsh Government.

I agree that my details can be used for monitoring and research purposes only and that they will be destroyed at the end of the programme.

I accept that my details will be added to a database which will be used to pass information to the Welsh Government, the European Commission and other agencies involved in the project for delivery, monitoring and audit purposes and will be held securely under the Data Protection Act 1998.

I agree that that information held by the Youth Service Early Intervention and Prevention Team and obtained through the registration and assessment process may be shared with relevant agencies or organisations for the purpose of support and engagement.

Participant Signature   Print Name   Date

		D	D	M	M	Y	Y

Project Worker Signature   Print Name   Date

		D	D	M	M	Y	Y

OFFICE USE ONLY

I confirm that the above information shows that this individual is eligible for ESF support.

Signed:... (Project Coordinator/Manager)   Date: ....