

**Wales Accord on the
Sharing of Personal Information**

**Information Sharing Protocol for
NEET Multi Agency Service**

**CAERPHILLY COUNTY BOROUGH
COUNCIL**

Version: 1 [ASSURED]

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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 Caerphilly NEET/Engagement and Progression Multi Agency Services.
- 1.3 The purpose of this ISP is to share relevant information to ensure that young people who are at risk of becoming not engaged in education, employment or training (NEET), and require support from more than one organisation, experience a seamless and effective service, and that the services are co-ordinated, coherent and achieve intended outcomes. The objectives of the ISP are:
 - Early identification and support for young people who are at risk of becoming NEET
 - Assess individual barriers to learning and progression facing Young People
 - Identify and initiate appropriate and relevant services for young people, providing coaching and lead worker support as appropriate
 - Measure progress and inter-refer accordingly with a Young Person's needs/priorities
- 1.4 This ISP covers the exchange of information between Local Authority, Schools (see Appendix E), Post 16 Education providers, and Voluntary Organisations who all work with young people at risk of becoming NEET or who are currently NEET.
- 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 the Welsh Government Engagement Progression Framework Plan, the Caerphilly (NEET) Engagement and Progression Strategy and Operational Plan.
- 1.7 For the purpose of this ISP, **explicit consent** will be required from service users, or their parent/guardian if the child or young person does not have the capacity to understand the implications of giving their consent in the particular circumstance, except for the operational processes of Careers Wales which relies on **implied consent** for the sharing of client information with partner organisations (See Appendix D)
- 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.

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
1. Caerphilly County Borough Council	Manager for Community, Youth and Adult Education
2. Coleg y Cymoedd	Director of Learner Services
3. Coleg Gwent	Head of Learner Services
4. Careers Wales	Director of Corporate Services
5. Schools (See Appendix E)	Lead Officer
6. Rathbone Cymru Training	Director for Wales
7. Gwent Association of Voluntary Organisations (GAVO)	Chief Executive 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 the multi agencies involved in supporting young people who are NEET, or at risk of becoming NEET, resulting in young people getting the right support at the right time, from the right agency
- Improved outcomes for young people deemed vulnerable to becoming disengaged
- Early support and identification of young people at risk of being NEET resulting in a reduction in the number of young people actually becoming NEET
- Extend engagement of young people in education, employment and training post 16
- Increase provision of training opportunities
- Improved tracking and monitoring of potential NEETS

- Provision of multi agency individually tailored programmes of coaching and lead worker support
- Reduced duplication of multi-agency service delivery
- Reduction in multiple requests for information from service user
- Adult Mentor (Lead Worker) to facilitate , multi-agency interventions on a Young Person's behalf
- A reduction in the number of Young People NEET (16-24).

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, but with the exception of Careers Wales involvement (See Appendix D), the condition that will be relied upon is **explicit consent** and no further conditions need to be met for this information sharing.
- 4.3 As this ISP does not cover the exchange of sensitive personal information, a Schedule 3 condition is not required.
- 4.4 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.
- 4.5 Learning 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.
- 4.6 Section 25-29 of the Children Act 2004 places a duty on each children's services authority in Wales to make arrangements to promote co-operation between itself and relevant partner agencies to improve the well-being of children in their area. The section states that good information sharing is key to successful collaboration working and that arrangements under Section 10 of the Act should ensure that information is shared for strategic planning purposes and to support effective service delivery.
- 4.7 Section 2 of the Local Government Act 2000 provides Local Authorities with the power 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.

- 4.8 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).
- 4.9 Careers Wales is an organisation wholly owned by the Welsh Government and discharges the legal requirements pursuant to the delivery of Careers Services in Wales (Employment and Training Act 1973: Chapter 50).

The Welsh Government's remit for Careers Wales places a responsibility on the organisation to:

- Support clients with the formulation of career and progression plans, which may be shared with parents, educational establishment and other opportunity providers;
 - Provide a 'Placing service' for 16 – 19 year olds which assists clients in securing Employment and Training and requires a sharing of information with providers of these opportunities;
 - Establish partnership agreements with schools, colleges and other opportunity providers which includes details of the exchange of client information with partners
- 4.10 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 old clients gain and sustain employment, training and education, including the sharing of information to facilitate these outcomes.
- 4.11 The Education Act 1997: Section 44 Requires Head teachers / governors / LEAs – in respect of PRUs etc / Principals of FE colleges to provide the careers service with background information about the pupil / student relevant to providing careers guidance.
- 4.12 The Education Act 1981, Education Act 1996 and SEN Code of Practice Wales 2004 provides the statutory basis for Careers Wales access to young people statements of special education needs and communications between clients with learning difficulties and disabilities and professional supporting them in the Transitional Planning process.
- 4.13 The Education (Information about Individual Pupils) (Wales) Regulations 2007. Section 5(2)D of the regulations cites Careers Wales as a 'person' to whom Welsh Ministers may provide a variety of 'learner information' which includes unique pupil number (UPN), surname, first name(s), middle name(s), gender, date of birth, ethnic group, national identity, date of admission to school, national curriculum year group, post code of home where pupil normally resides, SEN provision type, whether looked after by the local authority (i.e. in care), whether the pupil is excluded from school.

5 Details of personal information being shared

- 5.1 Personal information shared for the purpose of this ISP includes a range of information and might therefore include:
- Name, Address, Tel. No., DOB, gender
 - Identifying reference number/s, including but not exclusively UPN, NI, etc
 - Level of current engagement
 - NEET category as defined by CCBC and Careers Wales' Tiers 1-5 (see appendix C)
 - Predicted qualifications and grades, achieved grades and examination
- 5.2 The information is used to identify and prioritise a Young Person's needs and to allocate the appropriate multi agency services to support and report progress. Young People 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 work) 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

- 6.1 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:
- Full Name – including first name, any middle names and surname, previous names or aliases
 - Address
 - Gender
 - DOB
 - Identifying Reference Number/s

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:

- Coleg y Cymoedd/Coleg Gwent Data Protection Statement on all enrolment and application forms
- Verbally at time of contact with Partner Organisations
- Directorate of Education & Lifelong Learning: Privacy Notices issued via schools to all parents
- Explicit Young Person's Consent Forms (Appendix F)
- Letter written by Careers Wales to young people in year 9 or in the case of Special Schools, to parents/guardians of pupils in Key Stage 3 (Appendix D explains this)

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 purpose of this ISP, **explicit consent** will be required from service users. The exception is Careers Wales (see appendix D).
- 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 overriding '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, or sooner if appropriate.

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.
Disengagement	Early identification RAG vulnerability profile and those lacking career management skills, Youth Engagement and Progression Framework Post 16 5 Tier model Tiers 3, 2 and 1. Definition of at risk of disengagement Youth Engagement and Progression Framework Post 16 5 Tier model Tier 4.
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.

Term	Definition
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.
Coleg y Cymoedd & Coleg Gwent	All college campuses across Caerphilly County Borough including subsidiary venues utilised in provision.
Lead Worker	Provides tailored support to young people living in Caerphilly County Borough aged 16-24 years who are at risk of disengagement, 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 over arching goal of engagement and empowerment in decision making whilst providing pre-engagement information, guidance and motivation.

18 Appendix B – Information Reference Flow Table

The sharing of personal information to support the provision of Caerphilly County Borough Council NEET Multi-Agency Services				
	Description	001	002	003
1	Information exchange General description of the process or stage to which the information exchange relates.	<u>Providing information</u> All organisations involved in supporting young people into, and providing education, employment and training Post 16, to provide Careers Wales and Local Authorities with information on the application status of potential entrants for those who have received offers within their service or who are at risk of disengagement from their services. Local Authority to provide Coleg y Cymoedd and Coleg Gwent with young person vulnerability RAG coding where enrolments have been confirmed to support/engage with those at risk to better maintain ETE. NB no detail will be provided unless the college has gained explicit consent from the young person.	<u>Monthly discussion/reporting</u> All organisations involved in supporting young people into, and providing education, employment and training Post 16 to discuss, or report on a monthly basis, those young people in Youth Engagement and Progression Framework 5 Tier Model, Tiers 4, 3, 2 & 1 deemed NEET or at high risk.	<u>Engagement and Progression meetings (KIT)</u> All organisations involved in supporting young people into education, employment and training Post 16 to meet via monthly Engagement and Progression (KIT) meetings to discuss those young people in Youth Engagement Progression Framework 5 Tier Model, Tiers 4, 3, 2 & 1 who require additional support.
	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.	The following personal information relates to the young person unless stated otherwise <ol style="list-style-type: none"> 1. Full Name 2. DOB 3. Address/contact details 4. Identifying Reference Number/s 5. Post 16 Provider details 6. Name of programme/course enrolled on 	The following personal information relates to the young person unless stated otherwise <ol style="list-style-type: none"> 1. Full Name 2. DOB 3. Address/contact details 4. Identifying Reference Number/s 5. Post 16 Provider details 6. Name of programme/course enrolled on 7. Qualifications achieved. 8. Additional support need requirements 	The following personal information relates to the young person unless stated otherwise <ol style="list-style-type: none"> 1. Full Name 2. DOB 3. Address/contact details 4. Identifying Reference Number/s 5. Post 16 Provider details 6. Name of programme/course enrolled on 7. Qualifications achieved. 8. Additional support need requirements

<p>3 Consent to share</p> <p>Details of when and how consent will be sought.</p>	<p>This ISP relies on both explicit consent and implied consent.</p> <ul style="list-style-type: none"> ➤ Explicit consent: given by the individual or their parent/guardian if the young person does not have the capacity to understand the implications of giving their consent in the particular circumstance, and is contained within: <ul style="list-style-type: none"> • Local Authority Young Persons' consent forms. • Team Around the Family (TAF) Consent forms • Coleg y Cymoedd/Coleg Gwent application and enrolment forms ➤ Implied consent: see Appendix D. <ul style="list-style-type: none"> • Careers Wales Client Information forms 		<p>This ISP relies on both explicit consent and implied consent.</p> <ul style="list-style-type: none"> ➤ Explicit consent: given by the individual or their parent/guardian if the young person does not have the capacity to understand the implications of giving their consent in the particular circumstance, and is contained within: <ul style="list-style-type: none"> • Coleg y Cymoedd/Coleg Gwent application and enrolment forms • Local Authority Young Persons' consent forms. • Team Around the Family (TAF) Consent forms ➤ Implied consent: see Appendix D. <ul style="list-style-type: none"> • Careers Wales Client Information forms 		<p>This ISP relies on both explicit consent and implied consent.</p> <ul style="list-style-type: none"> ➤ Explicit consent: given by the individual or their parent/guardian if the young person does not have the capacity to understand the implications of giving their consent in the particular circumstance, and is contained within: <ul style="list-style-type: none"> • Coleg y Cymoedd/Coleg Gwent application and enrolment forms • Local Authority Young Persons' consent forms. • Team Around the Family (TAF) Consent forms ➤ Implied consent: see Appendix D. <ul style="list-style-type: none"> • Careers Wales Client Information forms 	
<p>4 Partner Organisation(s)</p> <p>a Details of provider and recipient organisation(s).</p>	<p>Who by</p>	<p>Who to</p>	<p>Who by</p>	<p>Who to</p>	<p>Who by</p>	<p>Who to</p>
	<ol style="list-style-type: none"> 1. CCBC Directorate of Education & Life Long Learning 2. Coleg y Cymoedd 3. Coleg Gwent 5. Schools (See appendix E) 6. Rathbone Cymru Training 7. GAVO 	<ol style="list-style-type: none"> 4. Careers Wales 	<p>Tier 4: exchange updates on individuals at risk of disengagement</p> <ol style="list-style-type: none"> 1. CCBC 2. Coleg y Cymoedd 3. Coleg Gwent 4. Careers Wales <p>Tiers 3, 2 & 1 – monthly updates</p> <ol style="list-style-type: none"> 1. CCBC 4. Careers Wales 	<ol style="list-style-type: none"> 1. CCBC Directorate of Education and Life Long Learning 2. Coleg y Cymoedd 3. Coleg Gwent 4. Careers Wales 6. Rathbone Cymru Training 7. GAVO <ol style="list-style-type: none"> 1. CCBC Directorate of Education & Life Long Learning 2. Coleg y Cymoedd 3. Coleg Gwent 4. Careers Wales 6. Rathbone Cymru Training 7. GAVO 	<p>Tiers 2, 3 & 4: update on individuals who require targeted support</p> <ol style="list-style-type: none"> 1. CCBC 2. Coleg y Cymoedd 3. Coleg Gwent 4. Careers Wales 5. Schools (See appendix E) 6. Rathbone Cymru Training 7. GAVO <p>Tiers 2 & 3: monthly updates</p> <ol style="list-style-type: none"> 1. CCBC Directorate of Education & Lifelong Learning 	<ol style="list-style-type: none"> 1. CCBC 4. Careers Wales

b	Role(s) of staff responsible for providing and receiving the information.	Who by	Who to	Who by	Who to	Who by	Who to
		1.1 Manager - Community, Youth and Adult Education 1.2 Lead Workers 1.3 Adult Education Manager 1.4 Principal Youth Officers 1.5 PREVENT Co-ordinator 1.6 LIFT Co-ordinator 1.7 Bridges Co-ordinator 1.8 PASSPORT Co-ordinator 1.9 Communities First Co-ordinator 1.10 Children Services Post 16 Manager 1.11 Team Around the Family (TAF) Manager 1.12 Youth Offending Service Manager 2 College Director of Learner Services (Coleg y Cymoedd) 3 College Head of Learner Services (Coleg Gwent) 5 Challenge Advisor for Post 16 6 Director for Wales (Rathbone Cymru Training) 7 GAVO	4.1 Careers Wales Area Manager - CCBC 4.2 Careers Wales Data Controller - CCBC	4.3 Careers Wales Locality Managers 2 Coleg Y Cymoedd 3 Coleg Gwent 1.1 Manager - Community, Youth and Adult Education	1.1 Manager - Community, Youth and Adult Education 1.2 Lead Workers 1.3 Adult Education Manager 1.4 Principal Youth Officers 1.5 PREVENT Co-ordinator 1.6 LIFT Co-ordinator 1.7 Bridges Co-ordinator 1.8 PASSPORT Co-ordinator 1.9 Communities First Co-ordinator 1.10 Children Services Post 16 Manager 1.11 Team Around the Family (TAF) Manager 1.12 Youth Offending Service Manager 2 College Director of Learner Services (Coleg y Cymoedd) 3 College Head of Learner Services (Coleg Gwent) 4.1 Careers Wales Area Manager	1.1 Manager - Community, Youth and Adult Education 1.2 Lead Workers 1.3 Adult Education Manager 1.4 Principal Youth Officers 1.5 PREVENT Co-ordinator 1.6 LIFT Co-ordinator 1.7 Bridges Co-ordinator 1.8 PASSPORT Co-ordinator 1.9 Communities First Co-ordinator 1.10 Children Services Post 16 Manager 1.11 Team Around the Family (TAF) Manager 1.12 Youth Offending Service Manager 2 College Director of Learner Services (Coleg y Cymoedd) 3 College Head of Learner Services (Coleg Gwent) 4.1. Careers Wales Area Manager	1.1 Manager - Community, Youth and Adult Education 4.3. Careers Wales Locality Manager

<p>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.</p>	<p>Monthly Destination Reports</p>	<p>Young People identified as Tier 4, 3, 2 & 1 and recorded in the minutes of the meeting.</p>	<p>Young people identified as Tier 4, 3, 2 & 1 and recorded in the minutes of the meeting.</p>
<p>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.</p>	<p>Telephone Face to face Direct feed from IT system E Mail Hard copy</p>	<p>Telephone Face to face Direct feed from IT system E Mail Hard copy</p>	<p>Telephone Face to face Direct feed from IT system E Mail Hard copy</p>
<p>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.</p>	<p>Monthly</p>	<p>Monthly As and when required</p>	<p>Monthly As and when required</p>
<p>8 Additional consideration Issues of comments not included (where appropriate)</p>	<p>Email only with encryption using secure networks, strictly in-line with each partner organisations' Email Policy regarding the transmission of sensitive personal information.</p> <p>Each partner organisations Fax Procedure must be followed when sending personal information.</p> <p>ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures.</p> <p>Telephones would only be used for clarification should a conflict of information be received on destinations by Careers Wales.</p> <p>Secure postal methods must be used when sending information via Royal Mail.</p>	<p>Email only with encryption using secure networks, strictly in-line with each partner organisations Email Policy regarding the transmission of sensitive personal information.</p> <p>ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures.</p> <p>This meeting will take place in order to discuss those young people who are Tier 4, 3, 2& 1.</p>	<p>Email only with encryption using secure networks, strictly in-line with each partner organisations Email Policy regarding the transmission of sensitive personal information.</p> <p>ICT controls in-line with each partner organisations Information Security and Information Governance policies and procedures.</p> <p>This meeting will take place in order to discuss those young people who are Tier 4, 3, 2& 1.</p>

19 Appendix C – Youth Engagement and Progression Implementation Plan (WG 2013)

The 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)	<ul style="list-style-type: none"> • Sustaining education, employment or training (EET). • Working or studying part time over 16 hours. • Voluntary Work. 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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. 	<p>Allocation of lead worker depends on level of risk.</p> <ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • 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. 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Young person not available/ unable to seek EET (sickness, young carers, pregnancy, custody). • Young people with significant or multiple barriers requiring intensive personal support. 	<ul style="list-style-type: none"> • 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	<ul style="list-style-type: none"> • Young people unknown to Careers Wales. 	<ul style="list-style-type: none"> • Once individuals are identified they are allocated to appropriate tier and allocated a lead worker accordingly.

20 Appendix D - 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.

1	Bedwas High School
2	Blackwood Comprehensive School
3	Cwmcarn High School
4	Heolddu Comprehensive School
5	Lewis Girls Comprehensive School
6	Lewis School, Pengam
7	Newbridge School
8	Oakdale Comprehensive School
9	Pontllanfraith Comprehensive School
10	Rhymney Comprehensive School
11	Risca Comprehensive School
12	St. Cenydd Comprehensive School
13	St. Martins Comprehensive School
14	Ysgol Gyfun Cwm Rhymni

21 Appendix E – Caerphilly Schools

15	The Learning Centre
16	Trinity Fields

22 Appendix F – Explicit Young Person’s Consent Form



Young Person’s Consent Form

NameDate of birth.....

Address.....

Post code..... Telephone Number.....

Alternative Address.....

Email Address.....

National Insurance Number.....

Unique Pupil Number/Unique Learner Number (if known).....

Are you currently	Where?
In education or training	
Employed full time	
Employed under 16 hours	
Unemployed	
Redundant in last 6 months	
Under notice of redundancy	
On the Work Programme (over 18s only)	
Attended Work Programme in last 6 months	

Would you like support to access Education, Training or Employment:

Yes

No

I agree to the above information being shared across Engagement & Progression agencies listed below so that they can provide me with information and support I may be entitled to and discuss the options available to me

Yes

No

Your personal information will be held and used in accordance with the Data Protection Act 1998. Only information contained on this consent form will be shared. The partnership will not disclose such information to any unauthorised person or body but where appropriate will use such information in carrying out its various functions and services. The partnership may also use this data in connection with the prevention or detection of fraud or other crime.

The Partnership Includes:
Caerphilly County Borough Council
Careers Wales
Work placement providers
Training Providers
National Youth Advocacy Service
Communities First
Coleg y Cymoedd
Coleg Gwent
Job Centre Plus
Drug & Alcohol
Youth Service
Youth Offending Service
Youth Inclusion Support Programme

Signature of Young Person..... Date.....

Engagement & Progression worker name.....

Signature..... Date.....

Please return forms to:
Engagement & Progression Coordinator
Caerphilly County Borough Council
Penallta House, Tredomen Park,
Ystrad Mynach. CF82 7PG