

Wales Accord on the Sharing of Personal Information

Information Sharing Protocol for RCT Supporting Education, Employment and Training, Post 16 Partners

Final Version: 2.0

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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 Rhondda Cynon Taf (RCT) Supporting Engagement in Education, Employment or Training (EET) multi agency services with the regular sharing of personal information to identify and reduce the proportion of young people not in education, employment or training (NEET) aged 16+.
- 1.3 The purpose of this ISP is to share relevant information to ensure that young people who require support from more than one organisation, experience a seamless and effective service, and that services are co-ordinated, coherent and achieve intended outcomes. Information is therefore share to:
 - Assess personal barriers facing Young People
 - Identify and Initiate appropriate services to provide appropriate support
 - Measure progress and inter-refer accordingly with a Young Person's needs/priorities.
- 1.4 This ISP covers the exchange of information between the Local Authority on behalf of Schools and the Education Department, Careers Wales and Local Authority on behalf of Communities First and Further Education and Training Providers.
- 1.5 It supports the information sharing partner organisations involved and the groups of Young People 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; RCT's Supporting Engagement in EET Strategy and Action Plan and the RCT Guide to Schools and the RCT Non-Consent Supporting Engagement in Education, Training and Education Partners ISP.
- 1.7 For the purpose of this ISP, **explicit consent** is required from Young People.
- 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 |
|---|---|
| RCT Education & Lifelong Learning | Director Education & Life Long Learning RCT |
| Careers Wales | Director of Corporate Services |
| Coleg Y Cymoedd | Head of Learner Services |
| Community and Children's Services | Service Director |
| ITEC Training Solutions Ltd. | Development Director |

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:

- Seamless multi agency service delivery (the right support at the right time by the right agency)
- Reduced duplication of multi agency service delivery.
- Adult Mentor (Single Responsible Adult or Keyworker) to manage multi-agency interventions on a Young Person's behalf.
- Reduction in multiple requests for the same information from the individual.
- Multi agency individually tailored programme of support.
- A reduction in the number of young people in Tier 2, 3 and the provision of support for Tier 4
- A reduction of the number of young people who are or are at risk of becoming NEET 16+
- A reduction in the number of Young People claiming Job Seekers Allowance.

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 allowed 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 Section 123 – 129 of the Learning and Skills Act 2000 – this requires local authorities to provide youth support services and consult with other relevant agencies such as Health Boards, Police and Voluntary Organisations in doing so. It is considered that this provides an implied power to share personal data of children and young people in order to deliver those services
- 4.5 Section 25 – 29 of the Children Act 2004 places a duty on each children 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.
- 4.6 Section 2 of the Local Government Act 2000 provides Local Authorities with the powers 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.
- 4.7 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).

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, date of birth, address;
 - Service ReferenceNumber
 - NEET category as defined by RCT and Careers Wales’ Tiers 1 – 5 (Appendix B)
 - Post 16 provider details (including University name if appropriate).

- Name of programme enrolled on
- Personal Barriers or circumstances contributing to or preventing Services Users from entering opportunities
- Qualifications achieved/Examination results
- Attendance/Progress indicators

5.2 The information is used to identify and priorities the Young Person's needs, and to allocate the appropriate multi agency service 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) 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 C 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:

- Name
- Surname
- Address
- Date of Birth
- Service Reference Number (eg. And as agreed UPN, ULN, NI number etc)

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 – Data Protection Statement on all enrolment and application forms giving explicit consent.
- Education - Privacy Notice issued via Schools – issued to all parents.
- Education – Explicit Young Person’s Consent
- Careers Wales and the Consent Model (Appendix F)
- ITEC Training Solutions Ltd – Data protection
- Communities First - Explicit Consent

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 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 on 31st May 2016 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/ Young Person | 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 monitor and audited to ensure appropriate |

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|------------------------------------|---|
| | access is maintained. |
| Coleg Y Cymoedd | All college campus' across RCT including subsidiary venues utilised in provision. |
| Transitional Support Worker | Provides tailored support to young people living in Rhondda Cynon Taf 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 over arching 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 RCT. |
| Communities First | Communities First is a community focussed programme that supports the Welsh Government's Tackling Poverty agenda |

18 Appendix B -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. | <ul style="list-style-type: none"> 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 | <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. |

19 Appendix C – Information Reference Flow Table

| The sharing of personal information to support the provision of Rhondda Cynon Taf (RCT) Supporting Engagement in Education, Employment or Training (EET) | | | | |
|--|---|---|---|--|
| | Description | 001 | 002 | 003 |
| 1 | <p>Information exchange</p> <p>General description of the process or stage to which the information exchange relates.</p> | <p>All organisations involved in supporting young people into, and providing education, employment and training Post 16 to provide Careers Wales with information on all those who have received offers with their service. This ensures that all those between the ages of 16-24 have access to the support services available. Particularly if pre-16 sharing and reporting arrangements indicate the young person is at risk of disengagement from Education, Employment or Training.)Youth Engagement and Progression Framework 5 Tier Model Tiers 4,2,)</p> | <p>Careers Wales to discuss or report on a monthly basis those young people in Youth Engagement and Progression Framework 5 Tier Model, Tiers 4, 2 & 1.</p> | <p>All organisations involved in supporting young people into education employment and training post 16 to meet with Careers Wales to discuss monthly those young people in Youth Engagement and Progression Framework 5 Tier Model, Tiers 4, 2 & 1.</p> |
| | <p>Description of the information to be provided.</p> <p>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</p> | <p>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</p> <p>The following personal information relates to the young person unless stated otherwise</p> <ol style="list-style-type: none"> 1, Full Name 2. Service Reference Number 3. Post 16 Provider details 4. Name of programme enrolled on 5. Age 6. DOB 7. Address | <p>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</p> <p>The following personal information relates to the young person unless stated otherwise</p> <ol style="list-style-type: none"> 1, Full Name 2. Service Reference Number 3. Post 16 Provider details 4. DOB 5. Address 6. Title of Course enrolled on 7. Qualifications achieved. 8. Additional support need requirements | <p>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</p> <p>The following personal information relates to the young person unless stated otherwise</p> <ol style="list-style-type: none"> 1, Full Name 2. Service Reference Number 3. Post 16 Provider details 4. DOB 5. Address 6. Title of Course enrolled on 7. Qualifications achieved. |

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|---|--|--|---|--|---|---|---------------|
| | | | 8. Additional support need requirements | | | | |
| 3 | Consent to share Details of when and how consent will be sought. | Consent is explicit given by the individual and is contained within: - Coleg y Cymoed application and enrolment forms, - Local Authority Young Persons' Post 16 consent forms. - Careers Wales Client Information Form Communities First Registration document with Consent ITEC Training Solutions Ltd consent/application forms | | Consent is explicit given by the individual and is contained within: - Coleg y Cymoed application and enrolment forms, - Local Authority Young Persons' Post 16 consent forms. - Careers Wales Client Information Form. Communities First Registration document with Consent ITEC Training Solutions Ltd consent/application forms | | Consent is explicit given by the individual and is contained within: - Coleg y Cymoed application and enrolment forms, - Local Authority Young Persons' Post 16 consent forms. - Careers Wales Client Information Form. Communities First Registration document with Consent ITEC Training Solutions Ltd consent/application forms | |
| | | 4 | Partner Organisation(s) | Who by | Who to | Who by | Who by |
| a | Details of provider and recipient organisation(s) | Education and Life Long Learning RCTCBC Coleg Y Cymoedd Careers Wales Communities First ITEC Training Solutions Ltd | Careers Wales | ITEC Training Solutions and Coleg Y Cymoed will provide Careers Wales with updates on a monthly basis for those young people in Tier 4 who are at risk of disengaging from their current placement/provision. Careers Wales will provide Education and Lifelong Learning partners with updates on a monthly basis for those young people in Tier 2 and 1. | ITEC Training Solutions Ltd Coleg Y Cymoed Education & Lifelong Learning RCTCBC Local Authority Engagement and Progression Co-ordinator will provide Education and Lifelong Learning and Communities First with details of appropriate Tier 1 and Tier 2 young | ITEC Training Solutions Ltd and Coleg Y Cymoed will provide Careers Wales with updates on a monthly basis for those young people in Tier 4 who are at risk of disengaging from their current placement/provision. Local Authority Engagement and Progression Co-ordinator will provide Careers Wales with updates on a monthly basis for those young people in Tier 2 and 1 All Partners will share | Careers Wales |

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| | | | | | <p>people to ensure service response meets needs and is not duplicated.</p> <p>Communities First will provide Local Authority Engagement and Progression Co-ordinator with monthly updates on any young person referred in Tier 1 or Tier 2</p> | <p>information as and when required to ensure appropriate service responses are made available to provide additional support</p> | |
|--|--|--|--|--|---|--|--|

| b | Role(s) of staff responsible for providing and receiving the information. | Who by | Who to | Who by | Who to | Who by | Who to |
|---|---|---|---|---|---|--|---------------------------------------|
| | | <p>SEET Strategic Co-ordinator/LA Engagement and Progression Co-ordinator</p> <p>Post 16 Transitional Support Workers.</p> <p>14-19 Learning Pathways Strategic Co-ord</p> <p>College Head of Learner Services</p> <p>Adult Education Principal Officer</p> <p>Principal Youth Officer</p> <p>Detached Youth Team</p> | <p>Careers Wales Area Manager - RCT</p> <p>Careers Wales Data Controller</p> <p>SEET Strategic Co-ordinator /LA Engagement and Progression Co-ordinator</p> <p>Local Authority Management Information</p> | <p>Careers Wales Locality Managers</p> <p>SEET Strategic Co-ordinator /LA Engagement and Progression Co-ordinator</p> | <p>Post 16 Transitional Support Workers.</p> <p>College Head of Learner Services</p> <p>Adult Education Principal Officer</p> <p>Detached Youth Team Leader</p> <p>Detached Youth Workers</p> <p>Cluster Managers</p> <p>ITEC Training Solutions Ltd Centre</p> | <p>Post 16 Transitional Support Workers</p> <p>College Head of Learner Services</p> <p>Adult Education Principal Officer</p> <p>Detached Youth Team Leader</p> <p>Detached Youth Workers</p> <p>Communities First Cluster Staff</p> <p>ITEC Training Solutions Ltd</p> | <p>Careers Wales Locality Manager</p> |

| | | | | | | | |
|----------|--|--|--------------|--|---|--|--|
| | | Leader Detached Youth Workers Careers Wales Locality Managers Careers Wales Area Manager Communities First Co-ordinator ITEC Training Solutions Ltd Centre Manager. | Systems Team | | Manager ITEC Training Solutions Ltd Learner Recruiter | Centre Manager ITEC Training Solutions Ltd Learner Recruiter | |
| 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. | Monthly Destination Reports | | Young People identified as Tier 4, 2 & 1 | | Young people identified as Tier 4, 2 & 1 | |
| 6 | How will the information be transferred? Detail all agreed secure methods in | Telephone Direct feed from IT system E Mail | | Face to Face Direct feed from IT system | | Face to Face Direct feed from IT system | |

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| <p>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>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>Yearly</p> | <p>Monthly As and when required</p> | <p>Monthly As and when required</p> |

| | | |
|--|---|--|
| <p>8 Additional consideration s Issues or 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 sensitive 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>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 sensitive 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 4,2 & 1.</p> <p>Definition of disengagement is key stage 4 RAG vulnerability profile and those lacking career management skills, Youth Engagement and Progression Framework Post 16 5 Tier model Tiers 2 and 1. Definition of at risk of disengagement Youth Engagement and Progression Framework Post 16 5 Tier model Tier4.</p> |
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20 Appendix D – Supporting Engagement in EET Strategy



Supporting
Engagement in EET S

21 Appendix E – Supporting Engagement Action Plan



Supporting
Engagement Action P

22 Appendix F – 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.