# Wales Accord on the Sharing of Personal Information

Information Sharing Protocol for NEET Multi Agency Service within Merthyr Tydfil County Borough Council

Final: v0.5

Draft V0.5 Review Date: 29<sup>th</sup> August, 2015 Issue Date: 29<sup>th</sup> August, 2014 Quality Assurance Date: 29<sup>th</sup> August, 2014

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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 Merthyr Tydfil NEET multi-agency services to identify and reduce the proportion of young people not in education, employment or training (NEET) and to identify and support at an early stage all young people at risk of being NEET.
- 1.3 For this purpose these multi agency services have come together to form the Merthyr Tydfil NEET to identify and reduce the proportion of young people not in education, employment or training by providing them with a timely offer of careers information, advice and guidance. The information is shared to assess personal barriers and implement the appropriate support and training
- 1.4 This ISP covers the exchange of information between the local authority, training agencies, further education college, Careers Wales, Secondary Schools, employment agencies and third sector agencies within the area of Merthyr Tydfil County Borough Council.
- 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's NEET Strategy, "Young People not in Education, Employment or Training", published September 2011.
- 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.
- 1.10 An Information Reference Flow Table is contained within Appendix B.

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
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Schools (see Appendix G)	Headmaster
MTCBC Education Inclusion & ALN Services	ALN & Inclusion Manager
MTCBC Community Services	NEET Coordinator
MTCBC Children Services	Head of Children's Services
<ul> <li>Gellideg Foundation</li> </ul>	Chief Project Officer
MTCBC Youth Service	Play & Youth Manager
Careers Wales	Regional Manager for Wales
College Merthyr Tydfil	Head of Student Services
Rathbone Training	Youth Programme Manager
Tydfil Training Consortium	Area Delivery Manager
College MT Work Based Learning	Contract Manager
Transition into Employment	Project Manager
Bridges into Work	Employability Manager
Multiple Intervention Assistance (MIA)	Family Support Coordinator
Parenting Support Programme	Family & Parenting Coordinator
Voluntary Action Merthyr Tydfil (VAMT)	CF Cluster Lead
Youth Offending Service (YOS)	Regional Manager

- 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) and multi-agency individually tailored programme of support.
  - Key worker to manage multi-agency interventions on Service Users behalf
  - Information is shared to assess personal barriers facing Services Users, implement appropriate service(s) to support, and measure progress and inter-refer accordingly with Service User needs/priorities
  - Reduced duplication of multi-agency service delivery and reduction in multiple request for information from the Service User
  - partner organisations that form the Merthyr Tydfil NEET Operational Group who 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..

#### 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 **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.

### 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;
  - NEET Category ( At Risk / Ready to Enter / Not Ready to Enter);
  - Personal Barriers or circumstances contributing to or preventing Service Users from entering opportunities:
  - Post 16 destination, college, training, job, unemployed.
- The information is used to identify and prioritise the Service User'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. Service Users 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

- 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:
  - First Name
  - Surname
  - Unique Learning Number
  - Address
  - Postcode
  - Date of Birth

#### 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:
  - NEET guidance/information leaflet.
  - Careers Wales Letter.
  - Post 16 Transition Support Letter

### 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 29<sup>th</sup> August, 2015 and every two/three years thereafter or sooner if appropriate.

## 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 NEET is a young person not in Education, Employment or Training.
МТСВС	Merthyr Tydfil County Borough Council

Unique Learning Number (ULN)	A Unique Learning Number (ULN) is a 10-digit identifier, which is applied to the Learner Record of anyone over the age of 14 involved in UK education or training.
EPC	Engagement & Progression Coordinator
VAMT	Voluntary Action Merthyr Tydfil (VAMT)
CPO – Gellideg	Chief Project Officer

## **Appendix B – Information Reference Table**

	The sharing of personal information to support the provision of NEET multi-agency service.							
	Description	Referral	Assessment and Allocation	Intervention and Review				
1	Information  General description of the process or stage to which the information exchange relates.	All partner organisations are involved in supporting young people pre 16 and post 16 planning arrangements into education, employment and training.  To provide information on interventions, support needs and the post 16 destination for all those service users engaged in their service.  This ensures that all those between the ages of 14-24yrs have access to the support services available so that they do not become NEET.  Referral are sent by the school /Careers Wales for consideration by the NEET co-ordinator	Once a referral is received by the NEET Co-ordinator an Engagement & Progression Coordinator from the most appropriate organisation will assess the service user and inform the NEET Operational Group	Intervention takes place by the Lead Worker in the NEET Operational Group Meetings are arranged to discuss and confirm post 16 destination and support needs. Reviews in the form of monthly meetings whereby monitoring of progress by the NEET Operational group take place.				

WASPI Information Sharing Protocol for....

2	What information will be shared?  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.	<ol> <li>Demographic data;</li> <li>NEET Category.</li> </ol>	<ol> <li>Demographic data;</li> <li>NEET Category ( At Risk / Ready to Enter / Not Ready to Enter);</li> <li>Personal Barriers or circumstances contributing to or preventing Service Users from entering opportunities:         <ul> <li>Health information;</li> <li>Education information/background;</li> <li>Family Background</li> <li>Behavioural issues;</li> <li>Relationships</li> <li>Lifestyle and risks.</li> </ul> </li> <li>Post 16 destination, college, training, job, unemployed.</li> </ol>	<ol> <li>Demographic data</li> <li>NEET Category (At Risk/Ready to Enter/Not Ready to Enter);</li> <li>Personal Barriers or circumstances contributing to or preventing Service Users from entering opportunities:         <ul> <li>Health information;</li> <li>Education information/background;</li> <li>Family Background;</li> <li>Behavioural issues;</li> <li>Relationships;</li> <li>Lifestyle and risks.</li> </ul> </li> <li>Post 16 destination, college, training, job, unemployed.</li> </ol>
3	Consent to share  Details of when and how consent will be sought.	Information is passed from the schools of children who are potentially NEET for pre-16 (See Schools Privacy Notice).	Careers Wales letter (sent to parents about the support they can offer, who have the option to opt-out)  Post-16 all sign up to the service when they engage with one of the partner organisations for support.	Consent follows on from the School Privacy Notice, Careers Wales letter and individual sign-up for Post-16.

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Descript	ion	Refer			and Allocation	Intervention	and Review
4 Partner Organisa	ation(s)	Who By	Who to	Who by	Who to	Who by	Who to
	provider and rganisation(s).	School     Careers     Wales	3. MTCBC Community Services	2. Careers Wales 3. MTCBC Community Services 4. MTCBC Education Inclusion & ALN Services 5. MTCBC Children Services 6. MTCBC Youth Services 7. College Merthyr Tydfil 8. Transition into Employment (TIE) 9. Rathbone Training 10.Bridges into Work (BIW) 11.Merthyr Tydfil College Work Based Learning (WBL) 12.Tydfil Training Consortium (TTC)	2. Careers Wales 3. MTCBC Community Services 4. MTCBC Education Inclusion & ALN Services 5. MTCBC Children Services 6. MTCBC Youth Services 7. College Merthyr Tydfil 8. Transition into Employment (TIE) 9. Rathbone Training 10.Bridges into Work (BIW) 11.Merthyr Tydfil College Work Based Learning (WBL) 12.Tydfil Training Consortium (TTC)	<ol> <li>Careers Wales</li> <li>MTCBC         Community         Services</li> <li>MTCBC         Education         Inclusion &amp;         ALN Services</li> <li>MTCBC         Children Services</li> <li>MTCBC Cohildren Services</li> <li>MTCBC Youth Services</li> <li>College Merthyr Tydfil</li> <li>Transition into Employment (TIE)</li> <li>Rathbone Training</li> <li>Bridges into Work (BIW)</li> <li>Merthyr Tydfil College Work Based Learning (WBL)</li> <li>Tydfil Training Consortium (TTC)</li> </ol>	2. Careers Wales 3. MTCBC Community Services 4. MTCBC Education Inclusion & ALN Services 5. MTCBC Children Services 6. MTCBC Youth Services 7. College Merthyr Tydfil Transition into Employment (TIE) 8. Rathbone Training 9. Bridges into Work (BIW) 10.Merthyr Tydfil College Work Based Learning (WBL) 12. Tydfil Training Consortium (TTC)

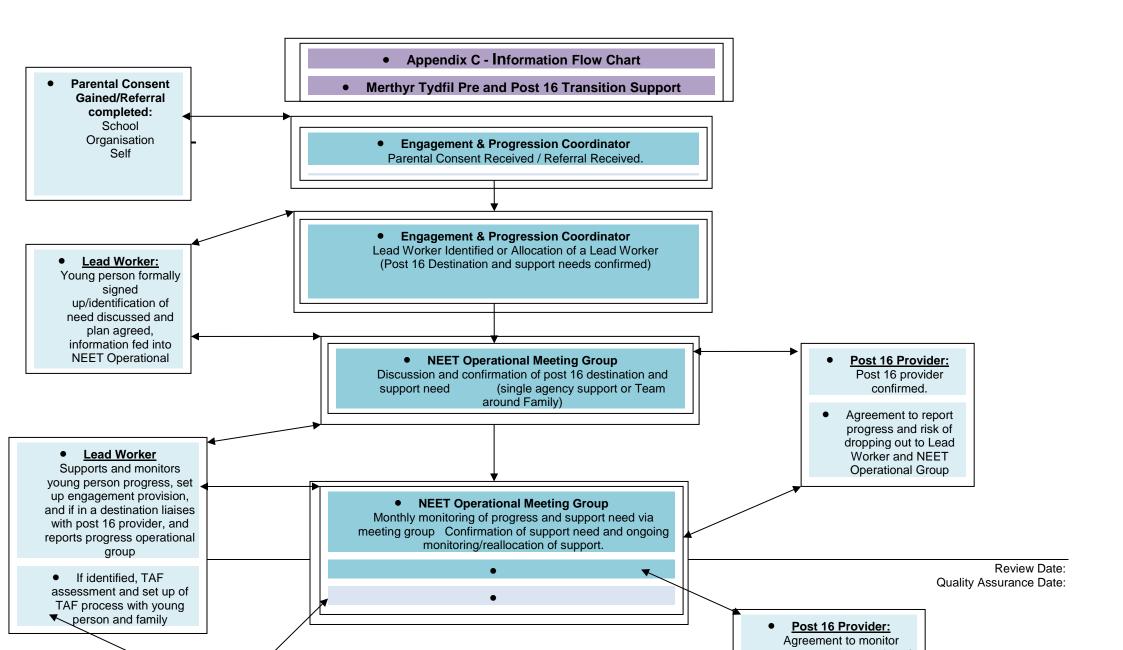
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						<ul><li>13. MTCBC Youth     Offending Service</li><li>14. Multi Intervention     Assistance (MIA)</li><li>15. Parent Support     Programme</li><li>16. VAMT</li></ul>	13. MTCBC Youth Offending Service 14. Multi Intervention Assistance (MIA) 15. Parent Support Programme 16. VAMT	<ul> <li>13. MTCBC Youth Offending Service</li> <li>14. Multi Intervention Assistance (MIA)</li> <li>15. Parent Support Programme</li> <li>16. VAMT</li> </ul>
		Role(s) of staff	Who By	Who to	Who by	Who to	Who by	Who to
	á	responsible for providing and receiving the information.	Teacher     Careers     Manager &     Adviser	3. NEET Coordinator	2. i. Careers Manager ii Careers Advisor iii EPC 3. NEET Coordinator 4. i. Education Inclusion & ALN Manager ii. EPC 5. i. Social Worker ii. LAC Education Officer iii. Chief Project Officer - Gellideg 6i. Youth Manager ii. Youth Worker 7 i. Manager Student Services ii. Administrator iii. EPC 8. i. Manager ii. Administrator iii. EPC 9. i. Manager	4 Education Inclusion & ALN Manager 5 i. Social Worker ii. LAC Education Officer iii. CPO - Gellideg 6 i. Youth Manager ii. Youth Worker 7 i. Manager Student Services ii. Administrator 8 i. Manager ii. Administrator 9. i. Manager ii. Administrator 10. i. Manager ii. Administrator 11. i. Manager ii. Administrator 12. i. Manager ii. Administrator 13. i. Manager ii. Administrator 14. i. Manager ii. Intake Team 14, i. Manager	<ol> <li>i. Careers Manager         ii. Careers Advisor</li> <li>NEET         Coordinator</li> <li>Education         Inclusion &amp; ALN         Manager</li> <li>i. Social Worker         ii. LAC Education         Officer         iii CPO – Gellideg</li> <li>i. Youth Manager         ii. Youth Worker</li> <li>i. Manager Student         Services         ii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>iii. Manager         iii. Administrator</li> </ol>	<ol> <li>i. Careers Manager         ii. Careers Advisor</li> <li>NEET         Coordinator</li> <li>Education         Inclusion &amp; ALN         Manager</li> <li>i. Social Worker         ii. LAC Education         Officer         iii CPO - Gellideg</li> <li>i. Youth Manager         ii. Youth Worker</li> <li>i. Manager Student         Services         ii. Administrator</li> <li>ii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>ii. Manager         iii. Administrator</li> <li>iii. Administrator</li> </ol>

			iii. EPC 15. i. N	eyworkers Manager Keyworkers	12. i. Manager i. Administrator  13. i. Manager ii. Intake Team 14, i. Manager ii. keyworkers 15. i. Manager ii. Keyworkers	12. i. Manager ii. Administrator  13. i. Manager ii. Intake Team 14, i. Manager ii. keyworkers 15. i. Manager ii. Keyworkers
ţ	Description  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.	Form title: Post 16 Transition Support.  This form is used to collect and refer information in relation to NEET.	ii. Keyworkers iii. EPC  Assessment and Alloca  Form title: Post 16 Transition Supp  This form is used to collect and rei information in relation to NEET.	oort	Intervention  Form title: Post 16 Tran  This form is used to coll information in relation to within the form may be monthly review meeting	lect and refer o NEET. Details referred to in
					Agendas and minutes a delegates that attend th	re circulated to

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.	Secure Email (encrypted via Egress Switch);     Telephone Calls.	Secure Email (encrypted via Egress Switch);     Verbal at operational group meetings;     Telephone Calls.	Verbal at monthly review meetings.     Secure Email (encrypted Egress).
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.	1. As and when necessary.	1. Monthly or as and when necessary.	1. Monthly or as and when necessary.
8	Additional Issues or comments not included (where appropriate).	N/A	N/A	N/A



## **Appendix D – Careers Wales Letter**



## **Appendix E – Merthyr Tydfil County Borough Council Consent Letter**



## Appendix F - Schools Privacy Notice



## Appendix G – List of Secondary Schools

School Name	Address
Afon Taf High School	Yew Street, Troedyrhiw, Merthyr Tydfil. CF48 4ED
Cyfarthfa High School	Cae Mari Dwn, Queens Road, Merthyr Tydfil. CF47 8RA
Pen Y Dre High School	Gurnos Estate, Merthyr Tydfil. CF47 9BY
Bishop Hedley High School	Penydarren, Merthyr Tydfil CF47 9AN

Final

## Appendix H – Careers Wales and the Consent Model



Final