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# Wales Accord on the Sharing of Personal Information

## Information Sharing Protocol for YOUTH ENGAGEMENT AND PROGRESSION FRAMEWORK CAERPHILLY COUNTY BOROUGH COUNCIL

Version Final – V2

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Quality Assurance Group WASPI South East QA Group

## 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 following consultation between the participating partner organisations.
- 1.2 This ISP is intended to help practitioners understand what information can be shared between the listed partners for the stated purpose(s). It also provides assurance that the partners have considered the requirements of data protection legislation.
- 1.3 This ISP has been prepared to support the regular sharing of personal information for the Youth Engagement and Progression Framework in the Caerphilly County Borough Council area
- 1.4 Personal information is shared for the purpose of identifying young people who have become, or who are at risk, of becoming disengaged with education, employment or training and who could benefit from support from more than one organisation and then providing the appropriate support to those young people. Their personal information will be shared with organisations in order to provide a seamless and effective service which is co-ordinated, coherent and tailored to the specific needs of the individual in order to achieve the intended outcomes to benefit the young person. The objectives of this ISP are:
  - Early identification and support for young people who are at risk of becoming NEET (Not in Education, Employment or Training)
  - Providing support for young people who have become NEET
  - Assess individual barriers to learning and progressions 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
  - To enable parties to undertake research and evaluation activities in the public interest
  - To maintain and update the internal management information systems of Careers Wales. Personal data input into the management information system will be used to support the data subject generally throughout their engagement with Careers Wales and will not be limited to just working under the Youth Engagement and Progression Framework.

This ISP should be read in conjunction with the Welsh Government Youth Engagement and Progression Framework Implementation Plan (2013) the Caerphilly (NEET) Engagement and Progression Strategy and Operational Plan.

## 2 The information sharing partner organisations

- 2.1 The table below sets out the organisational partners to the ISP, the key contact points and the departments, divisions and teams typically involved in sharing information for the purposes described in this ISP.

Information Sharing Partner Organisations	Owner / Point of contact	Departments / Divisions / Teams
Caerphilly County Borough Council (CCBC)	Engagement and Progression Co-ordinator	Communities/Community Education
Career Choices Dewis Gyrfa Ltd (Careers Wales)	Director of Corporate Services	Careers Wales
Coleg y Cymoedd	Director of Learner Services	All Coleg Y Cymoedd
Coleg y Gwent	Head of Learner Services	Crosskeys Campus
Schools (see Appendix D)	Chief Education Officer	Education and Corporate Services/Learning Education and Inclusion

- 2.2 The ISP owners / points of contact have overall responsibility for this ISP within their respective organisations and must therefore ensure the ISP is disseminated, understood and acted upon by relevant practitioners.
  - 2.3 The owner / point of contact for each partner organisation will regularly monitor and review the use of this ISP to ensure information is shared effectively and appropriately.
  - 2.4 Once the ISP has been assured, each partner organisation will nominate a signatory to sign the ISP at Appendix F. The signatory will be an appropriate person from the partner organisation who can sign on behalf of the organisation.
- ## 3 Specific organisational / practitioner obligations
- 3.1 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 sharing the outcome of any investigation, where appropriate, with other partners to the ISP.
  - 3.2 Practitioners who share information in line with this ISP should make themselves aware of, and adhere to, their organisation's Information Governance and records management procedures; in particular the provisions that relate to collecting, processing and disclosing personal information.
  - 3.3 Every reasonable step should be taken to ensure that inaccurate personal data are erased or rectified without delay. Consideration must be given to advising partner organisations that they may have received inaccurate information. In circumstances where partner organisations cannot be informed, advice should be taken from an Information Governance lead (or equivalent).

#### 4 Legislative / statutory powers

**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**

- 4.1 The sharing arrangements described in this ISP take into account the relevant data protection legislation, the Human Rights Act 1998 and the common law duty of confidence.
- 4.2 Before sharing personal information, partner organisations must have identified a clear legal basis for doing so.
- 4.3 Data protection legislation includes the concept of:
- 'personal data'; any information relating to an identified or identifiable (living) natural person, and
  - 'special categories of data' / 'sensitive processing'; personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation
- Whilst information about deceased people is not covered by data protection legislation, data about deceased people is covered by a similar level of confidence.
- 4.4 Further information and guidance on lawful processing of personal information can be found on the Information Commissioner's website; [www.ico.org](http://www.ico.org)
- 4.5 In order for sharing to be lawful:
- At least one legal basis in each of the two tables below needs to be met (this is based on the assumption that services supported by ISPs will be processing special categories of data / undertaking sensitive processing).
  - Organisations need to be specific and should not normally select more than one legal basis per table.
  - Where more than one legal basis is selected, an explanation should be provided in the Pre Quality Assurance Checklist.

- 4.6 The legal bases have been streamlined to those likely to be most relevant to public service providers. Other legal bases exist and may be added to the table if required. Clear notes should be added to explain how any additional legal basis is relevant.
- 4.7 Partner organisations also need to ensure they take into account the Data Protection Act 2018 and any additional requirements it places on the use of the legal bases set out in Articles 6 and 9 of GDPR (see Part 2 of the Act) and processing for the 'law enforcement purposes' (see Part 3 of the Act). The ICO has guidance on this matter and queries about the relevance of any legal basis should be raised with an Information Governance lead.
- 4.8 Consent to process personal data should not be confused with consent to treat patients. The two are separate and should not be confused or merged.

#### Article 6 Legal Bases for Sharing Personal Data

Legal basis	Checkbox / Notes
General processing	
Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)	<input type="checkbox"/> Legislation: > Local Government Act 2000 (s2) > The Government of Wales Act 2006 (s60) > Learning & Skills Act 2000 (s33, 40, 138 & 140) > Education Act 1997 (s44) > Children Act 2004 (s25) > SEN Code of Practice for Wales > Employment and Training Act 1973 (s8, 9 & 10) > The Education (Information about Individual Pupils) (Wales) Regulations 2007 > Frameworks such as Youth Engagement and Progression Also, the functions of Careers Wales are set out <i>inter alia</i> : > The Objects of Careers Wales > The annual remit letter issued by Welsh Government

#### Article 9 Legal Bases for Sharing Special Categories of Personal Data

Legal basis	Checkbox / Notes
General processing	

Necessary for reasons of substantial public interest - Art 9(2)(g)

GDPR Art 9(2)(g) requires a basis in UK law, which is provided by Section 10(3) of the Data Protection Act 2018 (DPA 2018).

**Section 10(3) of the DPA 2018** refers to the need to meet a relevant condition on Part 2 of Schedule 1 of the DPA 2018. The relevant conditions are:

**Schedule 1, Part 2, Para 6 Statutory etc and government purposes**

(1) *This Condition is met if the processing –*  
 (a) *is necessary for the purpose listed in sub-paragraph (2), and*  
 (b) *is necessary for the reasons of substantial public interest*

(2) *Those purposes are –*  
 (a) *The exercise of a function conferred on a person by an enactment or rule of law;*  
 (b) *The exercise of a function of the Crown, a Minister of the Crown or a government department.*

Sharing Special Categories of personal data is necessary for the reasons of substantial public interest to identify barriers/potential barriers to education, training and employment so that it is possible to implement a strategy to prevent young persons from becoming NEET (not in education, employment or training). The aim of these strategies is to prevent young persons from becoming NEET and to promote equality of provision and opportunity which is in the substantial public interest as in addition to supporting individual data subjects concerned, such strategies will support wider economic and social wellbeing in Wales and will support the effectiveness of expenditure on education and training.

Sharing special category personal data with other organisations interested or concerned in the delivery of education, training and careers services will, where required / appropriate, facilitate the above in the substantial public interest.

Processing of special category data is necessary for the purposes of exercising the functions outlined above and it will not be possible to deliver these functions without the processing of both personal data and special category data.

## 5 Personal information to be shared

- 5.1 Only the **minimum necessary** personal information consistent with the purposes set out in this document can be shared. Anonymised and pseudonymised information should be used where necessary.
- 5.2 Information provided by partner organisations will not generally be released to any third party without prior consultation with the originating partner organisation.

- 5.3 An information reference table at Appendix B provides details of the information exchanges associated with this ISP, including the typical categories of information shared, the organisations involved and the parts of the organisation typically involved. As controllers in their own right, partner organisations are responsible for ensuring the appropriate staff have access to personal information that is adequate, relevant and limited to what is necessary for the intended purpose.

- 5.4 The following table sets out the personal information commonly shared to identify data subjects and ensure partner organisations :

Personal Identifiers		Select all that apply
Name (including aliases)		<input checked="" type="checkbox"/>
Date of birth		<input checked="" type="checkbox"/>
Address		<input checked="" type="checkbox"/>
Postcode		<input checked="" type="checkbox"/>
Other reference number (e.g. NHS number, National Insurance number, any system/service number)		<input checked="" type="checkbox"/>

## 6 Data Subjects' Rights

- 6.1 Data protection legislation provides various individual rights for data subjects. Advice on how these rights should be met should be sought from each organisation's Information Governance representative, Data Protection Officer or equivalent. Specific guidance on these rights is available on the Information Commissioner's website; [www.ico.org](http://www.ico.org)
- 6.2 The following paragraphs refer to key rights associated with sharing personal information.
  - 6.3 Unless doing so would risk harm to them or others, or hinder any investigation or legal proceedings, data subjects should be informed how and why their personal information will be processed and who it is shared with (the Right to be Informed). Ideally, this information – often provided in what is commonly referred to as a privacy notice - will be provided at the first point of contact. It can be part of a registration / consent form or a standalone document.
  - 6.4 A layered approach is often appropriate. This could involve a high level organisational statement supplemented by specific service level information; for example a website or leaflet and verbal information provided by a practitioner.
  - 6.5 Information should be clear and particular care should be taken when relying on consent as the legal basis for sharing information, or where working with children, as there are additional requirements to consider. Further information on the 'Right to be Informed' is available on the Information Commissioner's website; [www.ico.org](http://www.ico.org)

6.6 For the purposes of this ISP, partner organisations should set out below how they meet the requirements of the Right to be Informed. Ideally, a consistent message will be provided and it may be helpful to agree a standard service level privacy notice.

Name of Organisation	Method of Informing (select any that apply)	Name of document / website (e.g. website address, leaflet/form name)	Comments
CCBC	<input checked="" type="checkbox"/> Website <input type="checkbox"/> Leaflet <input type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments)	Privacy Notice – available on individual school websites  Data Protection policies (CCBC Data Protection Policy July 2018)	Issued to parents/guardian/carer by school
Careers Wales	<input checked="" type="checkbox"/> Website <input type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other (specify in comments)	<input checked="" type="checkbox"/> Letter to parents/guardians <input type="checkbox"/> Privacy notice on website <input type="checkbox"/> www.careerswales.com <input type="checkbox"/> Summary cards given out at initial face to face meetings which details where to find the privacy notice <input checked="" type="checkbox"/> Reference to the privacy notice on telephone pre-recorded message	Letter sent to parents/guardians of pupils in year 9, or in the case of Special Schools, to parents/guardians of young people at Key Stage 3.
Coleg y Cymoedd/Coleg Gwent	<input checked="" type="checkbox"/> Website <input checked="" type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other (specify in comments)	Data Protection Statement on enrolment and application forms and privacy statements which are available electronically and in hard copy.	Issued when applying for courses  Updated Privacy Notices are e-mailed to learners as and when any changes are made

6.7 All participating organisations will have in place policies and procedures to uphold the confidentiality, integrity and availability of personal information with specific reference to the retention, storage and disposal of records.

6.8 Requests for the information referenced in this ISP will be dealt with in accordance with each partner organisation's relevant policies and procedures.

6.9 Each partner organisation will put in place a formal procedure by which data subjects, partner organisations and practitioners can direct any complaints regarding the information sharing practices documented in this ISP.

6.10 There is an expectation that partners to this ISP will work together to keep all partners informed of any complaints or requests for information received from data subjects or third parties. The partners will also keep each other informed of any problems associated with the information sharing practices documented in this ISP and there is an expectation that they will collaborative to develop and improve these practices.

## 7 Information security

7.1 Each partner organisation must have an appropriate and adequate security framework.

7.2 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.

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

7.4 All partners must ensure adequate and appropriate training on the subjects of data protection and confidentiality is provided to all staff with access to personal data.

## 8 Review of this ISP

8.1 This ISP will be reviewed two years from signing this document or sooner if appropriate.

## 9 Appendix A – Glossary of Terms

Term	Definition
<b>Data Protection Act 2018</b>	The UK's third generation of data protection law replaces the previous Data Protection Act 1998. The 2018 Act accepts the standards and obligations set by GDPR and, where GDPR allows, makes specific provisions relevant to the UK.  The 2018 Act also transposes EU Data Protection Directive 2016/680 (Law Enforcement Directive) into domestic UK law.
<b>Data Protection Officer</b>	It is important the GDPR and the DPA 2018 are read side by side. Certain categories of organisation, including any public body or authority (except courts in their judicial capacity) are required to designate a suitably qualified Data Protection Officer (DPO). The tasks of the DPO are set out in Article 39 of GDPR.
<b>Data subject</b>	A 'data subject' is an identified or identifiable natural person. Organisations may refer to data subjects as service users, patients, clients, citizens, etc. but for consistency, WASPI framework documentation refers to data subjects.
<b>GDPR</b>	The General Data Protection Regulation (GDPR) lays down rules relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.
<b>Personal data</b>	'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
<b>Personal identifiers</b>	A set of basic personal details that allow partner organisations to identify a data subject.
<b>Personal information</b>	Includes information falling within the definition of 'personal data' and information about deceased individuals. Data protection legislation does not apply to information about deceased individuals but such information needs to be treated confidentially and WASPI should be applied to this information.
<b>Practitioner</b>	An inclusive term that refers to those involved in the care, education, welfare of data subjects; i.e. those who provide a public service.

<b>Processing personal data</b>	'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.' (GDPR Art 4(2))
<b>Special categories of data / sensitive data</b>	Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. (GDPR Art 9(1))  Personal information relating to criminal convictions and offences or related security measures (GDPR Art 10).
<b>Disengagement</b>	Early identification RAG vulnerability profile and those lacking career management skill, 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.
<b>Responsible Manager</b>	A senior manager within an organisation who has overall responsibility for the area or 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.
<b>Coleg y Cymoedd &amp; Coleg Gwent</b>	All college campuses across Caerphilly County Borough Council including subsidiary venues utilised in provision.
<b>Lead Worker</b>	Provides tailored support to young people living in the Caerphilly County Borough area aged between 16-24 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 you 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.
<b>Post 16</b>	Young people who are above the compulsory school age but have not attained the age of 19 and are no longer required to attend statutory education.

**10. Appendix B – Information Reference Table for the Youth Engagement & Progression Framework for the Caerphilly County Borough Council area**

Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
<p><b>1 Information exchange</b></p> <p>General description of the process or stage to which the information sharing relates</p>	<p><b>Activity 1: Information to be given to Careers Wales:</b></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:</p> <ul style="list-style-type: none"> <li>the application status and destination information of young persons up to the age of 19 to whom they have issued offers to provide a service, or who they consider are at risk of disengagement from their services.</li> </ul> <p><b>Activity 2: Information to be given to Colleges and Careers Wales by LA</b></p> <p>LA to provide Colleges with young person vulnerability RAG coding where enrolments have been confirmed to support/engage with those at risk to better maintain education, training and employment.</p>	<p>These meetings will be carried out in accordance with the agreed Terms of Reference</p> <p>All organisations involved in supporting young people in the Youth Engagement and Progression Framework will meet to discuss those young people who are deemed NEET, or at high risk of becoming NEET, so as to:</p> <ul style="list-style-type: none"> <li>identify those individuals who require targeted support and</li> <li>to report on the progress of those young people who have previously been identified as NEET at risk of becoming NEET to determine if any further support is required.</li> </ul>	<p>Careers Wales will share information with CCBC by giving them restricted access to the Careers Wales' management information system (presently IO).</p>

Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
<p><b>2 What information will be shared?</b></p> <p>Describe the information to be shared – you do not need to go to 'field level' detail.</p> <p><b>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</b></p>	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> <li>Personal identifiers e.g. name, DOB, identifying reference numbers, etc.</li> <li>Demographic data e.g. address/contact details</li> <li>Family / personal history / personal profile including any known barriers to the young person engaging in education, employment or training</li> <li>Post 16 provider details</li> <li>Details of programme/course enrolled on</li> <li>Outcome/qualifications achieved</li> <li>Additional support need requirements if required on</li> </ul>	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> <li>Personal identifiers e.g. name, DOB, identifying reference numbers, etc.</li> <li>Demographic data e.g. address/contact details</li> <li>Family / personal history / personal profile including any known barriers to the young person engaging in education, employment or training</li> <li>Post 16 provider details</li> <li>Details of programme/course enrolled on</li> <li>Outcome/qualifications achieved</li> <li>Additional support need requirements if required</li> </ul>	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Address</li> <li>Contact details i.e. phone numbers and email address</li> <li>DOB</li> <li>Gender</li> <li>Ethnicity</li> <li>NI number</li> <li>Schools attended</li> <li>SEN category</li> <li>Disability</li> <li>Health factors</li> <li>Individual circumstances</li> <li>Intended destinations</li> <li>Preferred occupations</li> <li>Preferred areas</li> <li>Language</li> <li>Qualification level achieved</li> <li>Notes</li> <li>Attached documents</li> <li>Activity with Careers Wales</li> <li>Key workers and relations</li> </ul>

Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
<p><b>3 Partner Organisation(s)</b> Details of provider and recipient organisation(s)</p> <p>Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</p>	<p><b>Who by:</b> Activity 1: CCBC (Directorate of Education &amp; Life Long Learning) Coleg y Cymoedd Coleg Gwent Schools (see appendix D)</p> <p><b>Who to:</b> Activity 1: Careers Wales</p> <p>Activity 2: CCBC (Directorate of Education &amp; Lifelong Learning)</p>	<p><b>Who by:</b> Tier 4: exchange updates on individuals at risk of disengagement</p> <ul style="list-style-type: none"> <li>• CCBC</li> <li>• Coleg y Cymoedd</li> <li>• Coleg Gwent</li> </ul> <p>Tiers 3: updates on individuals who may need additional support to succeed</p> <p>Careers Wales</p> <p><b>Tiers 2 &amp; 1</b> – updates</p> <p>CCBC</p> <p>NB Careers Wales do not provide data about Tier 4, Tier 2 or Tier 1 clients at the multi agency meetings, but do provide data on Tier 3 clients who MAY need additional support to succeed and who have usually been in the Tier for longer than 90 days</p>	<p>Careers Wales will only share the information held in their management information system with CCBC and the access given will be restricted.</p>

Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
<p><b>4 What safeguards are in place to protect the information referred to in row 2, above?</b> Provide, in detail the specific agreed secure methods for sharing personal information</p>	<p>Information will be shared using one of the following methods: Telephone Face to face Direct feed from Careers Wales management information system with restricted access, password protection, etc. Secure e-mail e.g. Egress Switch, encryption Hard copy (to be sent securely i.e. registered post, hand delivered, etc.)</p>	<p>Information will be shared using one of the following methods: Telephone Face to face Direct feed from IT system with restricted access, password protection, etc. Secure e-mail e.g. Egress Switch, encryption Hard copy (to be sent securely i.e. registered post, hand delivered, etc.)</p>	<p>Careers Wales will provide the Engagement and Progression Coordinator in CCBC with read only access to Tier 1 and 2 individual client records via the Careers Wales IO Data-hubs</p>
<p><b>5 Relyance on consent</b> Check the box if any exchange relies on consent and explain how and when consent is obtained. Ensure section 4 of the ISP reflects this legal basis</p>	<p><input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent</p>	<p><input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent</p>	<p><input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent</p>
<p><b>6 Notes for Practitioners</b></p>	N/A	N/A	N/A

## 11 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

<b>Tier 5 Young People in Further Education, Employment or Training (EET)</b>	<ul style="list-style-type: none"> <li>Sustaining education, employment or training (EET). • Working or studying part time over 16 hours. • Voluntary Work.</li> </ul>	<ul style="list-style-type: none"> <li>No lead worker is judged necessary given that young person is already engaged and not judged to be at risk of disengaging.</li> </ul>
<b>Tier 4 Young People at risk of dropping out of EET</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>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.</li> </ul>
<b>Tier 3 Unemployed 16 and 17 year olds known to Careers Wales</b>	<ul style="list-style-type: none"> <li>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.</li> </ul>	<ul style="list-style-type: none"> <li>Lead worker identified for 100% cohort. • Careers Wales will provide the lead worker in nearly all cases.</li> </ul>
<b>Tier 2 Unemployed 16 and 17 year olds, known to Careers Wales, who are not available for EET</b>	<ul style="list-style-type: none"> <li>Young person not available/ unable to seek EET (sickness, young carers, pregnancy, custody). • Young people with significant or multiple barriers requiring intensive personal support.</li> </ul>	<ul style="list-style-type: none"> <li>Lead worker identified for 100% cohort. • Youth Service will provide lead worker in nearly all cases.</li> </ul>
<b>Tier 1 Unknown status on leaving Careers Wales services</b>	<ul style="list-style-type: none"> <li>Young people unknown to Careers Wales.</li> </ul>	<ul style="list-style-type: none"> <li>Once individuals are identified they are allocated to appropriate tier and allocated a lead worker accordingly.</li> </ul>

## 12 Appendix D – Caerphilly Schools

1	Bedwas High School
2	Blackwood Comprehensive School
3	Heolddu Comprehensive School
4	Lewis Girls Comprehensive School
5	Lewis School Pengam
6	Isiwyn High School
7	Idris Davies School 3-18
8	Newbridge School
9	Risca Comprehensive School
10	St. Cerydd Comprehensive School
11	St. Martins Comprehensive School
12	Ysgol Gyfun Cwm Rhymini (Heol Gelli Haf)
13	Ysgol Gyfun Cwm Rhymini (Y Gwindy)
14	The Learning Centre
15	Trinity Fields Special School

**13 Appendix E -- Service Providers**

<b>1</b>	Educate
<b>2</b>	WRU
<b>3</b>	Sgiliau
<b>4</b>	Army
<b>5</b>	ACT
<b>6</b>	CISWO
<b>7</b>	YOS
<b>8</b>	Groundwork Trust
<b>9</b>	Princes Trust
<b>10</b>	Llatau
<b>11</b>	ITEC
<b>12</b>	GAVO

NB Due to the complex and sometimes unique nature of the support required by young people who are NEET, or at risk of becoming NEET, it may be necessary to use a service provider that is not listed above but is able to provide the specific support needed. Additional service providers will be identified as and when required to meet the needs of the young person, but any referrals made will be in accordance with data protection legislation.