



Wales Accord on the Sharing of Personal Information

Information Sharing Protocol for YOUTH ENGAGEMENT AND PROGRESSION FRAMEWORK Torfaen County Borough Council ('TCBC')

Version	V2.0 2023
Date Assured	September 2022
Quality Assurance Group	WASPI Group South East QA Group

Contents

1	Introduction to this ISP	3
2	The information sharing partner organisations	4
3	Specific organisational / practitioner obligations	5
4	Legislative / statutory powers	6
5	Personal information to be shared	9
6	Data Subjects' Rights	10
7	Information security	16
8	Review, Breaches and Termination of this Agreement	16
9	Appendix A – Glossary of Terms	16
10	Appendix B – Information Reference Table for the Youth Engagement & Progression Framework for Torfaen	20
11	Appendix C – Youth Engagement and Progression Implementation Plan (WG 2013)	30
12	Appendix D – Torfaen Schools	31
13	Appendix E - Partner Signatures	38
14	Appendix F Partner organisations Privacy notice forms (See Appendix F attachment)	32

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 Torfaen 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 of and providing 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;
 - To assess individual barriers to learning and progressions facing young people;
 - To identify and initiate appropriate and relevant services for young people, providing coaching and lead worker support as appropriate;
 - To 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 / I2A project.

This ISP should be read in conjunction with the Welsh Government Youth Engagement and Progression Framework Implementation Plan (2013) and the Youth Engagement Partnership Plan for Torfaen. The 5 Tier case loading model is used within this process and reference is made to this within Appendix B. The definitions within the 5 Tier model have been included in Appendix C

NOTE: for ease of reading Appendix B has been separated into two parts. Part 1 deals with Pre 16 data sharing practices and Part 2 deals with Post 16 data sharing practices.

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
Career Choices Dewis Gyrfa Ltd. (Careers Wales)	Head of ICT	Careers Wales
ACT	Head of Head of Youth Engagement & Training	ACT
Abersychan School	Head Teacher	All School Divisions
Bron Afon Community Housing	Head of Community Services	Community Services Team
Coleg Gwent	Director	All Campuses
Coleg QS	Operations Manager	Torfaen locality
Croesyceiliog School	Head Teacher	All School Divisions
Cwmbran Centre for Young People	Centre Manager	Torfaen locality
Cwmbran High	Head Teacher	All School Divisions
Itec Training Solutions Limited	Business Manager	Torfaen locality
Llamau	Head of Learning, Training and Employment	Emphasis/ SYMF
Melin Homes	Director of Communities and Enterprise	Communities and Enterprise
Monmouthshire & Torfaen Youth Offending Service	Service Manager	Torfaen locality
Military Preparation College Training	Director of Quality	Newport/Cardiff locality
People Plus	Centre Manager	Torfaen locality
Platfform	Director of Operations	Torfaen locality
Pobl Group	YPSAS Service Manager	Torfaen locality
Pupil Referral Unit	Head Teacher	All Torfaen bases
Sglliau	Manager	Torfaen Locality

St Alban's RC High School	Head Teacher	All School divisions
Torfaen County Borough Council	Chief Officer, Communities, Customer Service and Digital	Youth Engagement and Progression Framework /Building Resilient Communities/ Communities for Work
Torfaen County Borough Council	Chief Officer, Education & Lead Director for Children and Young People	Inclusion / Youth Service / Play Service
Torfaen County Borough Council	Chief Officer, Social Care and Housing	Families First / TYPSS/ SPACE
West Monmouth School	Head Teacher	All School Divisions
Ysgol Gyfun Gwynllyw	Head Teacher	All School Divisions

- 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 E. 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 takes 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.uk
- 4.5 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, 9 and 10 of UK 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.
- 4.6 Consent to process personal data should not be confused with consent to receive the service. The two are separate and should not be confused or merged.

HOW TO USE THE TABLES

The following tables are designed to allow partners to this agreement to highlight the lawful bases relevant to the sharing described in this ISP. Please consider the guidance below, and take advice from your Data Protection Officer or equivalent. Definitions of terms can be found at Appendix A.

TABLES 1 & 2 – personal data and special categories of personal data

In most cases, information sharing partners will need to:

- Select at least one lawful basis from table 1 (sharing personal data), **and**
- Select at least one lawful basis from table 2 (processing special categories of data).

Notes: Usually, only one lawful basis should be selected in table 1 and one in table 2. If more than one lawful basis is selected in either table (for example if partner organisations are relying on different lawful bases), please add an explanatory note.

TABLE 3 – personal data about criminal convictions, offences etc.

- The lawful basis for sharing personal data about criminal convictions, offences or related security measures should be recorded in table 3.
- You **will always** have to complete table 1.
- If you are sharing special categories of personal data, you will also have to complete table 2.

TABLE 4 – processing by competent authorities for law enforcement purposes (as defined by Part 3 of the Data Protection Act 2018).

- Complete table 4 only if personal data is being processed by competent authorities **and** only for law enforcement purposes.
- If information is being shared for law enforcement and other purposes you may also need to complete tables 1, 2 & 3.

Table 1 - Article 6 Personal Data

Legal basis	Check box / Notes
General processing	
Consent – Art 6(1)(a)	<input checked="" type="checkbox"/> One partner will only share information when they have consent from the participant they are supporting. Details of this agency’s consent arrangements have been provided in Appendix B and Appendix F
Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)	<input checked="" type="checkbox"/>

	<p><i>Legislation:</i></p> <ul style="list-style-type: none"> ➤ Local Government Act 2000 (S2) ➤ <i>The Government of Wales Act 2006 (s60)</i> ➤ <i>Learning & Skills Act 2000 (s33, 40, 138 & 140)</i> ➤ <i>Education Act 1997 (s44)</i> ➤ <i>Children Act 2004 (s25)</i> ➤ <i>SEN Code of Practice for Wales</i> ➤ <i>Employment and Training Act 1973 (s8, 9 & 10)</i> ➤ <i>The Education (Information about Individual Pupils) (Wales) Regulations 2007</i> ➤ <i>Regulation 5(3) of the Pupil Information (Wales) Regulations 2011 (as amended by the National Curriculum (Miscellaneous Amendments) (Wales) Regulations 2016),</i> ➤ <i>Frameworks such as Youth Engagement and Progression</i> <p><i>Also, the functions of Careers Wales are set out in inter alia:</i></p> <ul style="list-style-type: none"> ➤ <i>The Objects of Careers Wales</i> ➤ <i>The annual remit letter issued by Welsh Government</i>
--	---

Table 2- Article 9 Special Categories of Personal Data

Legal basis	Checkbox / Notes
General processing	
Explicit Consent – Art 9(2)(a)	<input checked="" type="checkbox"/> One partner will only share information when they have consent from the participant they are supporting. Details of this agency’s consent arrangements have been provided in Appendix B and Appendix F
Necessary for reasons of substantial public interest - Art 9(2)(g)	<input checked="" type="checkbox"/> <p>UK 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).</p> <p>Section 10(3) of the DPA 2018 refers to the need to meet a relevant condition in Part 2 of Schedule 1 of the DPA 2018. The conditions relevant to this ISP are:</p> <p>(Schedule 1, Part 2, Para 6) Statutory etc and government purposes:</p> <p>(1) <i>This Condition is met if the processing –</i> <i>(a) is necessary for a purpose listed in sub-paragraph (2), and</i> <i>(b) is necessary for reasons of substantial public interest</i></p>

	<p>(2) <i>Those purposes are –</i></p> <p>(a) <i>the exercise of a function conferred on a person by an enactment or rule of law;</i></p> <p>(b) <i>the exercise of a function of the Crown, a Minister of the Crown or a government department.</i></p> <p>Sharing Special Categories of personal data is necessary for 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); and to implement strategies that will provide meaningful assistance to those who are NEET / at risk of becoming NEET. The aim of these strategies is to prevent young persons from becoming NEET and to promote equality of provision and opportunity. This is in the substantial public interest as in addition to supporting the 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.</p> <p>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.</p> <p>Processing of special category data is <u>necessary</u> 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.</p>
--	---

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 possible.
- 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 are referring to the same data subject:

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 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.uk
- 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.uk
- 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 (eg website address, leaflet/form name)	Comments
----------------------	--	---	----------

Torfaen County Borough Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Youth Engagement and Progression Privacy Notice (torfaen.gov.uk)	
ACT	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Privacy Policy 2020.pdf (acttraining.org.uk)	
Abersychan School	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	Ysgol Abersychan School - GDPR	
Bron Afon Community Housing	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	https://www.bronafon.org.uk/privacy-policy/	Stated within the Tenancy Agreement
Careers Wales	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input checked="" type="checkbox"/>	Privacy notice Careers Wales (gov.wales)	<ul style="list-style-type: none"> ➤ Letter to parents/guardians ➤ Privacy notice on website https://beta.careerswales.gov.wales ➤ Giving out summary cards at initial face to face meetings with details of where to find the privacy notice ➤ Reference to the privacy notice on telephone pre-recorded message
Coleg Gwent	Website <input checked="" type="checkbox"/>		

	Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i> <input type="checkbox"/>	Learner-Privacy-Notice-EN.pdf (coleggwent.ac.uk)	
Coleg QS	Website <input type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i> <input type="checkbox"/>		Included in Appendix F, Part of Traineeship Sign up form
Croesyceiliog School	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i> <input type="checkbox"/>	Croesyceiliog School - Privacy Policy	
Cwmbran Centre for Young People	Website <input type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i> <input type="checkbox"/>		Included in Appendix F
Cwmbran High	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i> <input checked="" type="checkbox"/>	Privacy-Notice-May-2021.pdf (cwmbranhighschool.co.uk)	

Itec Training Solutions Limited	Website	<input checked="" type="checkbox"/>	https://www.itecskills.ac.uk/app/uploads/2022/03/BI070-Customer-Privacy-Notice-V5.pdf	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
LLamau	Website	<input type="checkbox"/>		Included in Appendix F
	Leaflet	<input checked="" type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Melin Homes	Website	<input checked="" type="checkbox"/>	Privacy Policy (melinhomes.co.uk)	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Military Preparation College Training	Website	<input type="checkbox"/>		Included in Appendix F,
	Leaflet	<input checked="" type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Monmouthshire and Torfaen Youth Offending Service	Website	<input checked="" type="checkbox"/>	Privacy Policy (monmouthshire-torfaen-yos.org.uk)	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		

People Plus	Website	<input checked="" type="checkbox"/>	PP-078-Privacy-Notice-for-our-Customers-and-Learners-1-5-Jan-22.pdf (peopleplus.co.uk)	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Platform	Website	<input type="checkbox"/>		Privacy notice is contained in a document/handout that we give to people using our services and is not currently on our new website, we also use a consent form with young people which references the Privacy Notice. Please see Appendix F.
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input checked="" type="checkbox"/>		
Pobl Group	Website	<input checked="" type="checkbox"/>	Homes & Communities Privacy Notice - Pobl (poblgroup.co.uk)	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Pupil Referral Unit	Website	<input checked="" type="checkbox"/>	Torfaen Pupil Referral Unit Privacy Notice	
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Sgiliau	Website	<input type="checkbox"/>		Included in Appendix F
	Leaflet	<input checked="" type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		

St Alban's R.C High School	Website <input checked="" type="checkbox"/>	Privacy-Notice-St-Albans-RC-High-School-1.pdf (stalbans-pontypool.org.uk)	
	Leaflet <input type="checkbox"/>		
	Form <input type="checkbox"/>		
	Verbal <input type="checkbox"/>		
	Other (specify in comments) <input type="checkbox"/>		
West Monmouth School	Website <input checked="" type="checkbox"/>	Privacy-Notice.pdf (westmonmouthschool.com)	
	Leaflet <input type="checkbox"/>		
	Form <input type="checkbox"/>		
	Verbal <input type="checkbox"/>		
	Other (specify in comments) <input type="checkbox"/>		
Ysgol Gyfun Gwynllyw	Website <input checked="" type="checkbox"/>	privacy_notice_-_gdpr_tcbc_template__for_all_services_areas_v_1.0__003_.pdf (weebly.com)	
	Leaflet <input type="checkbox"/>		
	Form <input type="checkbox"/>		
	Verbal <input type="checkbox"/>		
	Other (specify in comments) <input type="checkbox"/>		

- 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, Breaches and Termination of the Agreement

- 8.1 This ISP will be reviewed two years from signing this document or sooner if appropriate. There is guidance available on the WASPI website about the process for reviewing an ISP.
- 8.2 Breaches of this agreement should be reported to the Owners / Contact Points in Section 2, which may result in the information sharing set out in this agreement ceasing.
- 8.3 Partners to this agreement will determine the responsibilities following termination of this agreement, including the deletion of shared data or its return to the organisation that supplied it originally.

9 Appendix A – Glossary of Terms

Term	Definition
Appropriate Policy Document	<p>The Data Protection Act 2018 outlines the requirement for an Appropriate Policy Document to be in place when processing special category and criminal offence data under certain specified conditions.</p> <p>Detail on Appropriate Policy Documents can be found in Schedule 1, Part 4 of the DPA 18 and Section 42 of the DPA 18 for competent authorities.</p>

Data Protection Act 2018	<p>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 UK GDPR and, where UK GDPR allows, makes specific provisions relevant to the UK.</p> <p>The 2018 Act also transposes EU Data Protection Directive 2016/680 (Law Enforcement Directive) into domestic UK law.</p> <p>It is important the UK GDPR and the DPA 2018 are read side by side.</p>
Data Protection Officer	<p>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 UK GDPR.</p>
Data subject	<p>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.</p>
UK GDPR	<p>The UK General Data Protection Regulation (UK 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.</p>
Law Enforcement Purposes	<p>The purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security. (DPA 2018 Part 3, Chapter 1, Section 31)</p>
Personal data	<p>'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.</p>
Personal data about criminal convictions, offences or related security measures	<p>This includes personal data which relates to the alleged commission of offences by the data subject, or proceedings for an offence committed or alleged to have been committed by the data subject or the disposal of such proceedings, including sentencing. (DPA 2018 Section 11(2))</p>

Personal identifiers	A set of basic personal details that allow partner organisations to identify a data subject.
Personal information	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.
Practitioner	An inclusive term that refers to those involved in the care, education, welfare of data subjects; i.e. those who provide a public service.
Processing personal data	'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.' (UK GDPR Art 4(2))
Special categories of data / sensitive data	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. (UK GDPR Art 9(1)) Personal information relating to criminal convictions and offences or related security measures (UK GDPR Art 10).
Disengagement	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.
Responsible Manager	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.
Coleg Gwent	All college campuses across Coleg Gwent including subsidiary venues utilised in provision.
Lead Worker	Provides tailored support to young people living in the Torfaen area aged between 16-25 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.
Post 16	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.
Pre 16	Young people who are aged 11-16 who are still required to attend statutory education.

10. Appendix B – Information Reference Table for the Youth Engagement & Progression Framework for Torfaen

This table sets out the why, what, when and how of information sharing in detail. Guidance on completing this section can be found on the website

PART 1 APPENDIX B – SHARING OF PERSONAL DATA IN PRE 16 CONTEXT

	Description	RONI - Stage 1	RONI -Stage 2	RONI Stage 3	Multi- agency school meeting - Stage 4	Multi- agency school meeting - Stage 5	Multi- agency school meeting Stage 6	Predicted Destinations data- Stage 7
1	Information exchange General description of the process or stage to which the information exchange relates.	Data extracted from School SIMS database and placed into a report with a score attached to: <ul style="list-style-type: none"> • Attainment • Attendance • FSM • Vulnerable Learner categories • Exclusion & • School moves 	Score from RONI Report to be shared with School to identify young people at risk and potentially requiring additional support.	School provide feedback on the report to identify who the at risk group of pupils are within the year group and indicate what interventions are currently in place for a young person.	Organisations involved in supporting young people at risk of disengaging and becoming NEET receive the list of individuals and confirm whether their agency has any involvement.	Organisations involved in supporting young people that are at risk of disengaging and becoming NEET meet on a termly basis to discuss additional support and allocate lead workers.	Actions from the meeting will be shared with the group after the meeting	School provide predicted destinations for all school leavers in Year 11, Year 12 and Year 13, identifying those that may require additional support with their transitions

	Description	RONI - Stage 1	RONI -Stage 2	RONI Stage 3	Multi- agency school meeting - Stage 4	Multi- agency school meeting - Stage 5	Multi- agency school meeting Stage 6	Predicted Destinations data- Stage 7
2	<p>What information will be shared? 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>	<ul style="list-style-type: none"> • Personal Identifiers • Pre-16 provider details • Attendance /Attainment/ progress indicators • FSM Eligibility • Additional learning needs • Exclusions • School transfer • LAC status • Gypsy traveller status • young carer status • EAL • Pupil Referral Unit admissions 	<p>RONI Score report which includes a breakdown of scores for the following & includes Personal Identifiers:</p> <ul style="list-style-type: none"> • pre-16 provider details • Attendance /Attainment / progress indicators • FSM Eligibility • Additional learning needs • Exclusions • School transfer • LAC status • Gypsy traveller status • young carer status • EAL • Pupil Referral Unit admissions 	<p>RONI Score report which includes a breakdown of scores and feedback from the school on current interventions and whether they need additional support. The following info is included in the report along with personal identifies:</p> <ul style="list-style-type: none"> • pre-16 provider details • Attendance /Attainment / progress indicators • FSM Eligibility • Additional learning needs • Exclusions • School transfer • LAC status • Gypsy traveller status • young carer status • Pupil Referral Unit admissions 	<ul style="list-style-type: none"> • Personal Identifiers • Pre-16 provider details • Attendance /Attainment / progress indicators • Details of previous involvement with services • Additional learning needs • Personal Barriers or circumstances contributing to young person being identified as at risk • Risk of NEET Indicator Score • Destination post 16 	<ul style="list-style-type: none"> • Personal Identifiers • Pre-16 provider details • Attendance /Attainment / progress indicators • Details of previous involvement with services • Additional learning needs • Personal Barriers or circumstances contributing to young person being identified as at risk • Risk of NEET Indicator Score • Destination post 16 	<ul style="list-style-type: none"> • Personal Identifiers • Pre-16 provider details • Attendance /Attainment / progress indicators • Details of previous involvement with services • Additional learning needs • Personal Barriers or circumstances contributing to young person being identified as at risk • Risk of NEET Indicator Score • Destination post 16 	<ul style="list-style-type: none"> • Personal Identifiers • Predicted Destination • Application status • Personal Barriers or circumstances contributing to young person being identified as at risk • Risk of NEET rating • Additional learning needs

3	Partner Organisation(s)	RONI - Stage 1		RONI -Stage 2		RONI Stage 3		Multi agency school meeting- Stage 4		Multi agency school meeting - Stage 5		Multi agency school meeting Stage 6		Predicted Destinations data- Stage 7	
		Who By	Who To	Who By	Who To	Who By	Who To	Who By	Who To	Who By	Who To	Who By	Who To	Who By	Who To
	<p><i>Details of provider and recipient organisation(s)</i></p> <p><i>Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</i></p>	LA*	LA*	LA*	SS	SS	LA*	LA*	SS	LA*	LA*	LA*	SS	SS	LA*
								LA Education Dept,	SS	LA Education Dept	SS	LA Education Dept	LA Education Dept		Coleg Gwent
								LA Social Services Dept,	LA Social Services	LA Social Services	LA Social Services	LA Social Services	LA Social Services		Careers Wales
								Careers Wales	Careers Wales	Careers Wales	Careers Wales	Careers Wales	Careers Wales		
								YOS	YOS	YOS	YOS	YOS	YOS		
								Coleg Gwent	Coleg Gwent	Coleg Gwent	Coleg Gwent	Coleg Gwent	Coleg Gwent		

KEY:

LA* = Local Authority Skills and Employability Team

SS = Secondary School

	Description	RONI - Stage 1	RONI -Stage 2	RONI Stage 3	Multi- agency school meeting - Stage 4	Multi- agency school meeting - Stage 5	Multi- agency school meeting Stage 6	Predicted Destinations data- Stage 7
4	<p>How is information shared and what methods are used to keep the information secure?</p> <p><i>Provide, in detail the specific agreed secure methods for sharing personal information</i></p>	Information exported from database into a report and saved, password protected, onto the Torfaen CBC internal network drive.	<p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>or</p> <p>as a password protected attachment via Secure e-mail TLS 1.2 or above</p>	<p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>or</p> <p>as a password protected attachment via Secure e-mail TLS 1.2 or above</p>	<p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>or</p> <p>as a password protected attachment via Secure e-mail TLS 1.2 or above</p>	Information exchanged verbally at meeting	<p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>or</p> <p>as a password protected attachment via Secure e-mail TLS 1.2 or above</p>	<p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>or</p> <p>as a password protected attachment via Secure e-mail TLS 1.2 or above</p>

	Description	RONI - Stage 1	RONI -Stage 2	RONI Stage 3	MARGIE - Stage 4	MARGIE - Stage 5	MARGIE Stage 6	Predicted Destinations data- Stage 7
5	<p>Reliance on consent</p> <p><i>Check the box if any exchange relies on consent and explain how and when consent is obtained.</i></p> <p><i>Ensure section 4 of the ISP reflects this legal basis</i></p>	<input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent* <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent* <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent	<input type="checkbox"/> Exchange relies on consent <input checked="" type="checkbox"/> Exchange does not rely on consent

PART 2 APPENDIX B – SHARING OF PERSONAL DATA IN POST 16 CONTEXT

	Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
1	<p>Information exchange</p> <p><i>General description of the process or stage to which the information sharing relates.</i></p>	<p>Activity 1: Information to be given to Careers Wales and the LA:</p> <p>All organisations involved in supporting young people into, and providing education, employment and training Post 16, to provide Careers Wales and the Local Authority with information on:</p> <ul style="list-style-type: none"> • the application status and • destination information <p>of young persons up to the age of 18 to whom they have issued offers to provide a service, or who they consider are at risk of disengagement from their services.</p> <p>Activity 2: Information to be given to Coleg Gwent (Tertiary Partner) and Careers Wales by SS & LA:</p> <p>SS & LA to provide Coleg Gwent (Tertiary Partner) & Careers Wales with a young person vulnerability coding at the end of Year 10 for any learner to be considered for admission & likely to be vulnerable during their transition to ensure their support needs are met and they sustain in education and training.</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"> ➤ identify those individuals who require targeted support and ➤ 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. 	<p>Careers Wales will share information with the LA via 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
2	<p>What information will be shared?</p> <p><i>Describe the information to be shared – you do not need to go to ‘field level’ detail.</i></p> <p><u>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</u></p>	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> ➤ Personal identifiers e.g. name, DOB, identifying reference numbers, etc. ➤ Demographic data e.g. address/contact details ➤ Family / personal history / personal profile including any known barriers to the young person engaging in education, employment or training ➤ Post 16 provider details ➤ Details of programme/course enrolled on ➤ Additional Learning Needs 	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> ➤ Personal identifiers e.g. name, DOB, identifying reference numbers, etc. ➤ Demographic data e.g. address/contact details ➤ Family / personal history / personal profile including any known barriers to the young person engaging in education, employment or training ➤ Post 16 provider details ➤ Details of programme/course enrolled on ➤ Outcome/qualifications achieved ➤ Additional support need requirements if required 	<p>The following personal information relates to the young person unless stated otherwise:</p> <ul style="list-style-type: none"> ➤ Name ➤ Address ➤ Contact details i.e. phone numbers and email address ➤ DOB ➤ Gender ➤ Ethnicity ➤ NI number ➤ Schools attended ➤ SEN category ➤ Disability ➤ Health factors ➤ Individual Circumstances ➤ Intended Destinations ➤ Preferred Occupations ➤ Preferred Areas ➤ Language ➤ Qualification level achieved ➤ Notes ➤ Attached documents ➤ Activity with Careers Wales ➤ Key workers and relations

	Description	Identification of young person at risk of becoming NEET		Action/review meetings		Access to Management Information System
3	<p>Partner Organisation(s)</p> <p><i>Details of provider and recipient organisation(s)</i></p> <p><i>Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</i></p>	<p>Who by:</p> <p>Activity 1:</p> <ul style="list-style-type: none"> • Coleg Gwent (Tertiary Partner) • People Plus • Itec Training Solutions Ltd • Sgiliau • ACT • Cwmbran Centre for Young People • Coleg QS • MPCT • Secondary Schools <p>Activity 2:</p> <ul style="list-style-type: none"> • Torfaen County Borough Council • Secondary Schools 	<p>Who to:</p> <p>Activity 1:</p> <ul style="list-style-type: none"> • Careers Wales • Torfaen County Borough Council <p>Activity 2:</p> <ul style="list-style-type: none"> • Coleg Gwent (Tertiary Partner) • Careers Wales 	<p>Who by:</p> <p>Tier 4: exchange updates on individuals at risk of disengagement:</p> <ul style="list-style-type: none"> • LA • Coleg Gwent • Cwmbran Centre for Young People • Coleg QS • People Plus • ACT • Itec Training Solutions Ltd. <p>Tiers 3: updates on individuals who may need additional support to succeed:</p> <ul style="list-style-type: none"> • Careers Wales <p>Tiers 2 & 1 – KIT:</p> <ul style="list-style-type: none"> • LA • People Plus • ACT • Itec Training Solutions Ltd • CCYP • Llamau 	<p>Who to:</p> <p>Those in attendance at relevant review meetings:</p> <p>Tier 4:</p> <ul style="list-style-type: none"> • LA • Careers Wales <p>Tiers 3</p> <ul style="list-style-type: none"> • LA <p>Tiers 2 & 1 – KIT</p> <ul style="list-style-type: none"> • Bron Afon Community Housing • People Plus • ACT 	<p>Careers Wales will provide access to the data hub to the LA only.</p>

	Description	Identification of young person at risk of becoming NEET		Action/review meetings		Access to Management Information System
				<ul style="list-style-type: none"> • Melin Homes Bron Afon Community Housing • Coleg Gwent • Platform • Pobl Group • Sgiliau 	<ul style="list-style-type: none"> • Itec Training Solutions Ltd • CCYP • Llamau • Melin Homes • LA • Coleg Gwent • Platform • Pobl Group • Sgiliau 	

	Description	Identification of young person at risk of becoming NEET	Action/review meetings	Access to Management Information System
4	<p>What safeguards are in place to protect the information referred to in row 2, above?</p> <p><i>Provide, in detail the specific agreed secure methods for sharing personal information</i></p>	<p>Information will be shared using one of the following methods:</p> <p>Telephone</p> <p>Face to face</p> <p>Direct feed from IT system with restricted access, password protection, etc.</p> <p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>Secure e-mail TLS 1.2 or above</p>	<p>Information will be shared using one of the following methods:</p> <p>Telephone</p> <p>Face to face</p> <p>Direct feed from IT system with restricted access, password protection, etc.</p> <p>Saved on the One Drive and access provided to partners via a secure link on email</p> <p>Secure e-mail TLS 1.2 or above</p>	<p>Careers Wales will provide the Engagement and Progression Coordinator in LA with read only access to Tier 1 and 2 individual client records via the Careers Wales Data-hubs</p>
5	<p>Reliance on consent</p> <p><i>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</i></p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>[If relying on consent to share, how and when is it obtained and how is it documented?]</p>	<p><input checked="" type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>Platform are reliant on consent to share information regarding young people they are supporting, the agencies are responsible for retaining copies of their consent forms.</p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p>

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

<p>Tier 5 Young People in Further Education, Employment or Training (EET)</p>	<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.
<p>Tier 4 Young People at risk of dropping out of EET</p>	<ul style="list-style-type: none"> • Those engaged in less than 16 hours of EET. • Those who have been identified at risk of disengagement pre-16 and/or were judged as at risk of not making a positive transition who are subsequently in FE, sixth form or training. • Those who have been made aware to CW by EET providers (or themselves) as at risk of dropping out of EET. 	<p>Allocation of lead worker depends on level of risk.</p> <ul style="list-style-type: none"> • Low and medium risk – provider pastoral systems and/or allocation of learning coach as a lead worker. • High risk – may be allocated lead worker from either Youth Service or Careers Wales or if Families First involved Team Around the Family will decide allocation of lead worker.
<p>Tier 3 Unemployed 16 and 17 year olds known to Careers Wales</p>	<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.
<p>Tier 2 Unemployed 16 and 17 year olds, known to Careers Wales, who are not available for EET</p>	<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.
<p>Tier 1 Unknown status on leaving Careers Wales services</p>	<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.

12 Appendix D – Torfaen Schools

1	Abersychan School
2	Croesyceiliog School
3	Cwmbran High
4	St Albans RC High School
5	West Monmouth School
6	Ysgol Gyfun Gwynllyw
7	Pupil Referral Unit

14 Appendix F Partner organisations Privacy notice forms (See Appendix F attachment)



Appendix F Privacy
Notice Forms 2022 F