



## Wales Accord on the Sharing of Personal Information

### Information Sharing Protocol for

Sharing of specific personal information to enable an effective  
enhanced transition of vulnerable young people from  
TCBC schools to FEIs

**Version** Final V1

Date Assured April 2021

Quality Assurance Group WASPI South East Wales Partnership

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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 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 to enable planning and transition of vulnerable young people Post 16 to FEI in the South East Wales consortium. For transparency all young people will be addressed in the stage 1 Initial Transition Meeting which will then go on to further discuss and support those who have been identified as needing enhanced support with their transition.
- 1.4 Specific personal information is shared to ensure that all parties involved in Post-16 planning and transition are able to ensure that schools and Further Education Institutes (FEI) can:
  - 1) Identify as early as possible any learner/young person who might face barriers in relation to their transition to FEI as a result of an ALN, challenging circumstances, disengagement with education or any other reason.
  - 2) Identify professionals and organisations who are supporting or could support the learner/young person when transitioning to FEI
  - 3) Plan holistically and effectively for the transition of identified young people to FEI with the learner, the family where appropriate, the likely destination provision and any relevant agencies and organisations who can support in the process of ensuring a smooth transition.

## 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
Torfaen County Borough Council	Chief Officer, Education & Lead Director for Children and Young People	Inclusion, ALN, Education Welfare Service, Education Psychology Service, LACE, SENCOM, Youth Service
	Chief Officer, Social Care and Housing	Children's Services Representative
	Chief Officer, Neighbourhoods, Planning and Public Protection Services.	Inspire to Achieve/ Engagement and Progression Coordinator (EPC) (NEETS)
School – See Appendix C for full list	Head Teacher	ALNCO, Head of Transition, HoKS4; HoY 10, HoY11
Careers Wales	Operational /Development Manager Careers Wales	Careers Wales
Coleg Gwent Coleg y Cymoedd	Director Head of Inclusion	All Campuses: ALNCO; ALSCO (Additional Learning Support coordinator) Transition and Review Officers (TRO); Pastoral Lead,(Head of Learner Services) Inspire to Achieve
Aneurin Bevan University Health Board	Designated Education Clinical Lead Officer	ABUHB Family and Therapies
Monmouthshire & Torfaen Youth Offending Service	Education, Training and Employment Officer	YOS Representative

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 owners / 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.

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- 2.4 Once the ISP has been assured, each partner organisation will nominate a signatory to sign the ISP at Appendix D. 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](http://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 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
Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)	<input checked="" type="checkbox"/> <b><u>Local Authorities and other stakeholders/sharing partners</u></b> The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The following legislation supports the sharing of personal information for the purposes defined in this agreement;

- **Children Act 2004, Part 3, section 25** - places a duty on each child's service authority to make arrangements to promote cooperation between itself and relevant partner agencies to improve the wellbeing of children in their area
- **Children Act 2004, Part 3, section 28(2)** – places a duty on the service authority to make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children.
- **Local Government Act 2000, section 2** – places a duty on the local authority to promote or improve the social wellbeing of their area. This provides an implied power to share information with statutory services and the independent sector.
- **Education Act 2002, Part 11, section 175** – places a duty on the local authority to make arrangements for ensuring that their education functions are exercised with a view to safeguarding and promoting the welfare of children.
- **Social Services and Well-being (Wales) Act 2014, Part 7, section 130** – if a relevant partner of a local authority has reasonable cause to suspect that a child is a child at risk and appears to be within the authority's area (or that of another authority), it must inform the local authority of that fact.
- **ALN ET Act (2018)** – There will be a single legislative system relating to the support given to children and young people aged between 0-25 years who have an ALN. This is instead of the two separate systems currently operating to support children and young people of compulsory school age who have SEN, and young people in further education who have LDD. The ALN Code will provide a set of clear, legally enforceable parameters within which local authorities and those other organisations responsible for the delivery of services for children and young people with ALN, **must** act. The Welsh Government states that "person centred practice" is to be integral to the ALN system. The Act requires that all relevant bodies **must** have regard to the views, wishes and feelings of the child or young person and their parents and stresses the importance of them participating as fully as possible in decisions and to provide them with the information and support necessary to participate in those decisions. The sections in the ALNET Act 2018 related to the United Nations Conventions on the rights of children and persons with disabilities place a duty on LAs and other responsible bodies to consider the views, wishes and feelings of children, their parents/carers and young people as well as a duty to support participation and engagement in decision making

4.7 **Equalities Act (2010)** - The Equalities Act places duties on us all through the General Public Sector Equality Duty (GED). There are also specific duties placed on public sector bodies; health boards, local authorities, schools, and the Police. All must have due regard for the need to:

- ▶ Eliminate unlawful discrimination, harassment and victimisation
- ▶ Advance equality of opportunity

	<p>▶ Foster good relations</p> <p>....in carrying out public functions, employment and service delivery, including, services in partnerships and commissioned services.</p> <p><i>The Government of Wales Act 2006 (s60)</i></p> <p>➤ <i>Education Act 1997 (s44)</i></p> <p>➤ <i>The Education (Information about Individual Pupils) (Wales) Regulations 2007</i></p> <p>➤ <i>Regulation 5(3) of the Pupil Information (Wales) Regulations 2011 (as amended by the National Curriculum (Miscellaneous Amendments) (Wales) Regulations 2016),</i></p> <p><b><u>HEALTH</u></b></p> <p>The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller. The following legislation supports the sharing of personal information for the purposes defined in this agreement;</p> <ul style="list-style-type: none"> <li>• <b>Children Act 2004, Part 3, section 25</b> - places a duty on each child's service authority to make arrangements to promote cooperation between itself and relevant partner agencies to improve the wellbeing of children in their area</li> </ul> <p><b>Children Act 2004, Part 3, section 28(2)</b> – places a duty on the service authority to make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children.</p>
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**Table 2 - Article 9 - Special Categories of Personal Data**

Legal basis	Checkbox / Notes
Necessary for reasons of substantial public interest - Art 9(2)(g)	<p><input checked="" type="checkbox"/> <b><u>Local Authorities and other stakeholders/sharing partners</u></b></p> <p>GDPR Art 9(2)(g) requires a basis in UK law, which is provided by Section 10(3) of the Data Protection Act 2018.</p> <p>This in turn refers to the need to meet a relevant condition in Part 2 of Schedule 1 of the DPA 2018. The relevant condition is:</p> <p>Schedule 1, Part 2, Para 16 1 (a) support for individuals. 17 1 (a) counselling and support, 18 1 (a) safeguarding of children at risk</p> <ul style="list-style-type: none"> <li>• <b>Children Act 2004, Part 3, section 25</b> - places a duty on each child's service authority to make arrangements to promote cooperation between itself and relevant partner agencies to improve the wellbeing of children in their area</li> <li>• <b>Children Act 2004, Part 3, section 28(2)</b> – places a duty on the service authority to make arrangements for ensuring that their functions are discharged having regard to the need to safeguard and promote the welfare of children.</li> <li>• <b>Local Government Act 2000, section 2</b> – places a duty on the local authority to promote or improve the social wellbeing of their area. This provides an implied power to</li> </ul>

share information with statutory services and the independent sector.

- **Education Act 2002, Part 11, section 175** – places a duty on the local authority to make arrangements for ensuring that their education functions are exercised with a view to safeguarding and promoting the welfare of children.
- **Social Services and Well-being (Wales) Act 2014, Part 7, section 130** – if a relevant partner of a local authority has reasonable cause to suspect that a child is a child at risk and appears to be within the authority's area (or that of another authority), it must inform the local authority of that fact.
- **ALN ET Act (2018)** – There will be a single legislative system relating to the support given to children and young people aged between 0-25 years who have an ALN. This is instead of the two separate systems currently operating to support children and young people of compulsory school age who have SEN, and young people in further education who have LDD. The ALN Code will provide a set of clear, legally enforceable parameters within which local authorities and those other organisations responsible for the delivery of services for children and young people with ALN, **must** act. The Welsh Government states that "person centred practice" is to be integral to the ALN system. The Act requires that all relevant bodies **must** have regard to the views, wishes and feelings of the child or young person and their parents and stresses the importance of them participating as fully as possible in decisions and to provide them with the information and support necessary to participate in those decisions. The sections in the ALNET Act 2018 related to the United Nations Conventions on the rights of children and persons with disabilities place a duty on LAs and other responsible bodies to consider the views, wishes and feelings of children, their parents/carers and young people as well as a duty to support participation and engagement in decision making

4.8 **Equalities Act (2010)** - The Equalities Act places duties on us all through the General Public Sector Equality Duty (GED). There are also specific duties placed on public sector bodies; health boards, local authorities, schools, and the Police. All must have due regard for the need to:

- ▶ Eliminate unlawful discrimination, harassment and victimisation
- ▶ Advance equality of opportunity
- ▶ Foster good relations

....in carrying out public functions, employment and service delivery, including, services in partnerships and commissioned services.

#### **HEALTH**

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

	<p>This in turn refers to the need to meet a relevant condition in Part 2 of Schedule 1 of the DPA 2018. The relevant condition is:</p> <p>Schedule 1, Part 2, Para 16 1 (a) support for individuals. 17 1 (a) counselling and support, 18 1 (a) safeguarding of children at risk</p>
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## 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"/>

## 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](http://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](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	Comments
TCBC Education Service	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	TCBC PN115 <a href="http://torfaen.gov.uk">Post 16 transition for vulnerable young Privacy Notice (torfaen.gov.uk)</a>	Regular post 16 planning meetings are scheduled to discuss the transition of learners from the end of Year 9 upwards. These include screening meetings using multi-agency information where appropriate which enables the school to identify vulnerable learners in a timely manner in line with the ALN Code, drawing on multi-agency perspectives as outlined in the code. This enables planning with the learner, family and professionals to start at an early stage and offers a robust basis for the maintenance of Post-16 Placements.
TCBC Social Care & Housing	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="https://www.torfaen.gov.uk/en/Related-Documents/Data-Protection-and-Freedom-of-Information/Privacy-Notices/Social-Care-and-Housing/Service-Provision-for-Children-and-Family-and-Adult-Services.pdf">https://www.torfaen.gov.uk/en/Related-Documents/Data-Protection-and-Freedom-of-Information/Privacy-Notices/Social-Care-and-Housing/Service-Provision-for-Children-and-Family-and-Adult-Services.pdf</a>	As Above
TCBC Neighbourhoods, Planning & Public Protection	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="https://www.torfaen.gov.uk/en/Related-Documents/Data-Protection-and-Freedom-of-Information/Privacy-Notices/NPPP/Youth-Engagement-and-Progression-Privacy-Notice.pdf">https://www.torfaen.gov.uk/en/Related-Documents/Data-Protection-and-Freedom-of-Information/Privacy-Notices/NPPP/Youth-Engagement-and-Progression-Privacy-Notice.pdf</a>	As Above
Aneurin Bevan University Health Board	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/>	<a href="https://abuhb.nhs.wales/files/information-governance/privacy-notice-general/">https://abuhb.nhs.wales/files/information-governance/privacy-notice-general/</a>	

	Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify)</i>		
Monmouthshire & Torfaen Youth Offending Service	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify)</i>	<a href="https://www.monmouthshire.gov.uk/your-privacy/social-care-health/">https://www.monmouthshire.gov.uk/your-privacy/social-care-health/</a>	
Coleg y Cymoedd  Coleg Gwent	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify)</i>	<a href="https://www.cymoedd.ac.uk/en/about-us/policiesdocumentswelsh-language/privacy-policy/">https://www.cymoedd.ac.uk/en/about-us/policiesdocumentswelsh-language/privacy-policy/</a>  <a href="https://www.coleggwent.ac.uk/privacy-policy">https://www.coleggwent.ac.uk/privacy-policy</a>	
Careers Wales	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i>	<a href="https://careerswales.gov.wales/about-us/privacy-notice">https://careerswales.gov.wales/about-us/privacy-notice</a>	
Schools	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <i>(specify in comments)</i>	Please see links to Privacy Notices in Appendix C	It is the responsibility of each school to review the PN to ensure it mentions the sharing of information with partners

- 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 documented in this ISP.

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- 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 collaborate 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. There is guidance available on the WASPI website about the process for reviewing an ISP.

## 9 Appendix A – Glossary of Terms

Term	Definition
<b>Data Protection Act 2018</b>	<p>The UK's third generation of data protection law replaces the 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.</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 GDPR and the DPA 2018 are read side by side.</p>
<b>Data Protection Officer</b>	<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 GDPR.</p>
<b>Data subject</b>	<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>
<b>GDPR</b>	<p>The General Data Protection Regulation (GDPR) lays down laws 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>
<b>Law Enforcement Purposes</b>	<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>
<b>Personal data</b>	<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>

<b>Personal data about criminal convictions, offences or related security measures</b>	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))
<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; ie 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 processing</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))
<b>FEI</b>	Further Education Institution
<b>ALN</b>	Additional Learning Needs
<b>TCBC</b>	Torfaen County Borough Council
<b>ALNCO</b>	Additional Learning Needs coordinator
<b>ALSCO</b>	Additional Learning Support coordinator
<b>TRO</b>	Transition Review Officer
<b>YOS</b>	Youth Offending Service

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<b>MATSM</b>	Multi Agency Transition Screening Meeting
<b>PCP</b>	Person Centred Planning
<b>I2A</b>	Inspire to Achieve
<b>LAC/CASP/CP</b>	Looked after Children, Care and Support Plan, Child Protection,

**10 Appendix B – Information Reference Table for Sharing of specific personal information to enable an effective enhanced transition of vulnerable young people from TCBC schools to FEI**

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

	Description	Stage 1 Initial Transition Meeting	Stage 2 Multi-Agency Transition Screening Meeting – MATSM	Stage 3 Person Centred Planning Meeting Insert title of exchange 3
1	<p><b>Information exchange</b></p> <p><i>General description of the process or stage to which the information sharing relates.</i></p>	<p>The Transition Tracking Spreadsheet is prepared and pre-populated by school staff with support where appropriate from school partners such as Careers Wales, Inspire to Achieve, Engagement and Progression coordinator</p> <p>The FEI, SENCOM, Social services, YOS and Health representatives will be given the list of names and date of birth/unique learner number of the learners within the Year Group and asked to return relevant information/share relevant information at the multi-agency transition meeting (MATSM) at Stage 2.</p> <p>Those identified as facing barriers to making a successful transition and needing additional support will be identified and discussed in more detail at the multi-agency meetings (Stage 2)</p> <p>A Copy of the spreadsheet is attached</p>	<p>From the final term in Y9 regular screening meetings will be held by the school with professional partners (see below) in order to identify learners who may be vulnerable on transition and require enhanced support to make a successful transition to FEI. These meetings will involve the sharing of information recorded at Stage 1: Initial Transition Material and further specific information shared by participants at the multi-agency meeting.</p> <p>Information sharing will be used to identify learners who may require additional support to make a successful transition to FEI; who and what support is in place that would be helpful during the transition process (internal and external); who might be best placed to act as a transition lead for the learner and any additional support that may be needed. This will ensure that all relevant professionals will be invited to the PCP for transition meeting that will follow the MATSM for each individual identified. Input will be multi agency and may include representatives and/or information from: School; FEI; LA – various dept; Careers Wales; SENCOM; School Nurse; I2A; Social Care; YOS; Engagement and Progression Coordinator (EPC). This information will be recorded on the Transition Tracking Spreadsheet. Guidance script attached.</p>	<p>Now that the young person has been identified as needing an enhanced transition to FEI, PCP transition meeting will be organised by the school to ensure a holistic and coherent transition plan is put in place.</p> <p>Parent/Guardians/Learner will be invited to the PCP meeting with key professionals and the destination FEI. The PCP transition meeting will generate a written transition plan which will outline what each person/agency will do during the transition process. A lead transition adult will be named where possible to ensure actions are fulfilled.</p> <p>Each person involved with the transition plan and/or attending the meeting will be given a copy of the transition plan so that all professionals are aware of what will be happening when and duplication and gaps are avoided.</p>

	Description	Stage 1 Initial Transition Meeting	Stage 2 Multi-Agency Transition Screening Meeting – MATSM	Stage 3 Person Centred Planning Meeting Insert title of exchange 3
2	<p><b>What information will be shared?</b></p> <p><i>Describe the information to be shared – you do not need to go to ‘field level’ detail.</i></p> <p><b><u>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</u></b></p>	<p>The following information will be used to prepopulate the spreadsheet by the school and partners:</p> <ul style="list-style-type: none"> <li>Name</li> <li>Gender</li> <li>DOB</li> <li>Whether in Estyn Vulnerable Category</li> <li>Exclusions and attendance</li> <li>ALN Status</li> <li>Exam arrangements</li> <li>Involvement of SENCOM</li> <li>LAC/CASP/CP Status</li> <li>Whether at risk of NEET</li> <li>Other Professional involvement (e.g. YOS)</li> <li>Any barriers to a successful transition</li> </ul> <p>For Y11 students the information included will also cover:</p> <ul style="list-style-type: none"> <li>Application status if known</li> <li>Likely Intended destination</li> </ul> <p>Based on the information available the learner will be initially identified as:</p> <ol style="list-style-type: none"> <li>a. Unlikely to need enhanced transition arrangements to FEI</li> <li>b. Possibly will need enhanced transition arrangements to FEI – to discuss further at the MATSM (Stage 2)</li> </ol>	<p>At the multi-agency meeting, the professionals present will have sight of the pre-populated spreadsheet.</p> <p>Any information missing from the spreadsheet, out of date or wrong will be updated by the professionals in the room.</p> <p>Information shared at the meeting by professionals will offer an up to date and holistic view of the learner and their needs and enable the school and college to agree whether the learner does require an enhanced transition to FEI.</p> <p>The names and contact details of professionals involved or who could support the transition will be taken in order to ensure that all key professionals are invited to the PCP meeting.</p> <p>Individuals identified as requiring enhanced transition arrangements will be invited to be the subject of a PCP transition planning meeting (Stage 3)</p>	<p>The PCP transition meeting will take place with the Young person and the parent/carer as well as any professionals involved with the learner (identified at the MATSM) .</p> <p>A Transition Plan will be written up which will ensure that the plan is holistic, multi-agency and spans the whole transition period, including the summer break.</p> <p>What, who, and when each action is to be carried out will be recorded and copies disseminated to all involved so that there is no duplication and no gaps in the arrangements for supporting the learner through the transition period.</p>

3	Description	Stage 1 Initial Transition Meeting		Stage 2 Multi-Agency Transition Screening Meeting – MATSM		Stage 3 Person Centred Planning Meeting Insert title of exchange 3	
		Who by	Who to	Who by	Who to	Who by	Who to
	<p><b>Partner Organisation(s)</b></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>1)School</p> <p>2)TCBC</p> <p>3) SENCOM</p> <p>4) I2A</p> <p>5) EPC</p> <p>6) Social Care</p> <p>7) School nurse/health representative</p> <p>8) YOS</p>	<p>1)School</p> <p>2)TCBC</p> <p>3) Careers wales</p> <p>4) SENCOM</p> <p>5) I2A</p> <p>6) EPC</p> <p>7) Social Care</p> <p>8) School nurse/health representative</p> <p>9) YOS</p> <p>10) FEI</p>	<p>1)School</p> <p>2)TCBC</p> <p>3) Careers wales</p> <p>4) SENCOM</p> <p>5) I2A</p> <p>6) EPC</p> <p>7) Social Care</p> <p>8) School nurse/health representative</p> <p>9) YOS</p> <p>810 FEI</p>	<p>1)School</p> <p>2)TCBC</p> <p>3) Careers wales</p> <p>4) SENCOM</p> <p>5) I2A</p> <p>6) EPC</p> <p>7) Social Care</p> <p>8) School nurse/health representative</p> <p>9) YOS</p> <p>10) FEI</p>	<p>Those present at meeting/ contributing to meeting in advance:</p> <p>Learner</p> <p>Carer/Parent</p> <p>FEI</p> <p>Careers Wales</p> <p>Other agencies involved with the learner (on case by case basis)</p> <p>Those who the learner/family agree at the meeting can be involved in the transition plan.</p>	<p>Those present at meeting:</p> <p>Learner</p> <p>Carer/Parent</p> <p>FEI</p> <p>Careers Wales</p> <p>Other agencies involved with the learner (on case by case basis)</p> <p>Those who the learner/family agree at the meeting can be involved in the transition plan.</p>

	Description	Stage 1 Initial Transition Meeting	Stage 2 Multi-Agency Transition Screening Meeting – MATSM	Stage 3 Person Centred Planning Meeting Insert title of exchange 3
4	<p><b>How is information shared and what methods are used to keep the information secure?</b></p> <p><i>Provide, in detail the specific agreed secure methods for sharing personal information</i></p>	<p>Information is collated onto a spreadsheet by the school and transferred electronically via email TLS1.2 or secure file transfer Egress or Onedrive</p>	<p>Spreadsheet received by agency via secure email and kept securely in line with the specific data protection storage and retention processes of the agency or service.</p>	<p>The minutes of the meeting and the transition plan to be sent securely to all agencies involved in the meeting and/or transition plan.</p> <p>When received the documentation will be kept securely in line with the specific data protection storage and retention processes of the agency or service.</p>
5	<p><b>Reliance on consent</b></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>Information given to parents / guardians as to processes and information sharing throughout KS4 in the school.</p> <p>The school's privacy notice will outline the information shared and who with in relation to KS4 transition.</p> <p>Families must be given information with regard to information sharing and who their information may be shared with at this point. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon.</p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p>	<p><input type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>Generally, the learner and/or parent/guardian will be present at the PCP Transition meeting. They will therefore choose what information to share above and beyond what has already been shared at the MATSM.</p> <p>Where the learner and/or parent/guardian decline the opportunity to be present at the meeting, school to plan for the transition of the learner in their best interests.</p> <p>If a learner/young person has refused consent for the IDP to be maintained by the FEI at their final review, the transition meeting will go ahead but the IDP will not form part of the planning meeting.</p> <p>The learner/young person and parent/carer if appropriate will sign the transition plan at the end of the PCP meeting if present. If they are not present, they can be asked to sign it following the meeting.</p>

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	Description	Stage 1 Initial Transition Meeting	Stage 2 Multi-Agency Transition Screening Meeting – MATSM	Stage 3 Person Centred Planning Meeting Insert title of exchange 3
6	<b>Notes for Practitioners</b>	When populating the spreadsheet should work to the principle of relevant and minimal information to ensure effective decision making and outcomes are achieved	When populating the spreadsheet should work to the principle of relevant and minimal information to ensure effective decision making and outcomes are achieved	When populating the spreadsheet should work to the principle of relevant and minimal information to ensure effective decision making and outcomes are achieved

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**11 Appendix C – Partner Organisations Signatures**

This section should only be completed once the ISP has been assured by a Quality Assurance group. Further information on the ISP development process can be found on the WASPI Website.

By signing below, partner organisations are confirming they agree with the content of the ISP. In the context of sharing personal information, signing the ISP is one way to demonstrate accountability with the principles set out in Article 5 of GDPR.

The signatory will be an appropriate person with authority to sign the ISP on behalf of the organisation. The ISP lead has responsibility for obtaining signatures to the ISP.

<b>Partner Organisation</b>		<b>Partner Organisation</b>	
<b>Name</b>		<b>Name</b>	
<b>Position</b>		<b>Position</b>	
<b>Date</b>		<b>Date</b>	
<b>Signature</b>		<b>Signature</b>	

<b>Partner Organisation</b>		<b>Partner Organisation</b>	
<b>Name</b>		<b>Name</b>	
<b>Position</b>		<b>Position</b>	
<b>Date</b>		<b>Date</b>	
<b>Signature</b>		<b>Signature</b>	

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**12 Appendix D**

1	Abersychan School <a href="https://www.abersychan.org.uk/GDPR/">https://www.abersychan.org.uk/GDPR/</a>
2	Croesyceiliog School <a href="https://www.croesyceiliog.org.uk/privacy-cookies/">https://www.croesyceiliog.org.uk/privacy-cookies/</a>
3	Cwmbran High School <a href="http://www.cwmbranhighschool.co.uk/#">http://www.cwmbranhighschool.co.uk/#</a>  Please navigate to the Privacy Notice via the 'Information' link on the Home Page
4	St Albans RC High School <a href="https://www.stalbans-pontypool.org.uk/wp/wp-content/uploads/Privacy-Notice-St-Albans-RC-High-School-1.pdf">https://www.stalbans-pontypool.org.uk/wp/wp-content/uploads/Privacy-Notice-St-Albans-RC-High-School-1.pdf</a>
5	West Monmouth School <a href="http://westmonmouthschool.com/our-school/school-policies/">http://westmonmouthschool.com/our-school/school-policies/</a>
6	Ysgol Gyfun Gwynllyw <a href="http://gwynllyw.weebly.com/polisiau--policies.html">http://gwynllyw.weebly.com/polisiau--policies.html</a>
7	Torfaen Pupil Referral Unit <a href="#">Privacy Notices - Education   Torfaen County Borough Council</a>
8	Crownbridge School <a href="https://www.crownbridgeschool.co.uk/media/1153/privacy-notice-gdpr.pdf">https://www.crownbridgeschool.co.uk/media/1153/privacy-notice-gdpr.pdf</a>