



Wales Accord on the Sharing of Personal Information

Information Sharing Protocol for Torfaen County Borough Council Individual Development Plan for ALN

Version Final – V1

Date Assured July 2021

Quality Assurance Group WASPI South East Wales Quality Assurance Group

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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 Torfaen Local Authority to meet their statutory duties under the ALN & Education Tribunal Act to plan and assess children/young people with Additional Learning Needs (ALN) to determine if they require an Individual Development Plan (IDP)
- 1.4 Personal information is shared for the purpose of enabling Torfaen County Borough Council ALN Team to assess the educational needs of pupils under the ALN Act.

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 Chief Officer, Social Care and Housing	Inclusion, ALN, Education Welfare Service, Education Psychology Service, SENCOM Children & Adult Services
School – See Appendix D for full list. However please note, that additional Schools in addition to the signatory schools may be required to share information as and when Torfaen children/young people are placed there.	Head Teacher	ALNCO, Head Teacher, Teaching Staff and Learning Support Assistants
Aneurin Bevan University Health Board	Designated Education Clinical Lead Officer	Designated Education Clinical Lead Officer as the central point of contact for the Health Board

- 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.
- 2.4 Once the ISP has been assured, each partner organisation will nominate a signatory to sign the ISP at Appendix C. 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
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- 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.

Table 1 - Article 6 - Personal Data

Legal basis	Check box / Notes
<p>Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)</p>	<p><input checked="" type="checkbox"/> <u>Local Authorities and other stakeholders/sharing partners</u></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"> • 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 . • Education Act 2002 - 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. <p>✓ Chapter 3 – Admissions, exclusions and attendance</p> <p>✓ Part 7 - Curriculum in Wales</p>

	<ul style="list-style-type: none"> ✓ Part 9 - Childcare and Nursery settings ✓ Chapter 2 - Children with SEN. • 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. • 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. • 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. • The Education (Information about Individual Pupils) (Wales) Regulations 2007 – duties on Local Authority and school regarding information held on individual pupils.
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Table 2 - Article 9 - Special Categories of Personal Data

Legal basis	Checkbox / Notes
<p>Necessary for reasons of substantial public interest - Art 9(2)(g)</p>	<p><input checked="" type="checkbox"/> <u>Local Authorities and other stakeholders/sharing partners</u></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"> • 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

	<ul style="list-style-type: none"> • 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 <p>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:</p>
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	<ul style="list-style-type: none"> ▶ Eliminate unlawful discrimination, harassment and victimisation ▶ Advance equality of opportunity ▶ Foster good relations <p>....in carrying out public functions, employment and service delivery, including, services in partnerships and commissioned services.</p> <p>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> <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
- 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
- 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"/>	www.torfaen.gov.uk/en/Related-Documents/Data-Protection-and-Freedom-of-Information/Privacy-Notices/Education/ALN-Individual-Development-Plan-Privacy-Notice.pdf	Under the ALN Act it is a statutory requirement
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"/>	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	As above
	Website <input checked="" type="checkbox"/>		As above

Aneurin Bevan University Health Board	Leaflet	<input type="checkbox"/>	https://abuhb.nhs.wales/files/information-governance/privacy-notice-general/	
	Form	<input type="checkbox"/>		
	Verbal	<input type="checkbox"/>		
	Other (specify in comments)	<input type="checkbox"/>		
Schools	Website	<input type="checkbox"/>	Please see links to Privacy Notices in Appendix D	It is the responsibility of each school to review the PN to ensure it mentions the sharing of information with partners
	Leaflet	<input type="checkbox"/>		
	Form	<input type="checkbox"/>		
	Verbal	<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 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 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
Data Protection Act 2018	<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>
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 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>
GDPR	<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>
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	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))
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; ie 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.' (GDPR Art 4(2))
Special categories of data / sensitive processing	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))
IDP	Individual Development Plan
ALN	Additional Learning Need

Appendix B – Information Reference Table for Local Authority Individual Development Plan

Appendix B – Information Reference Table for Local Authority Individual Development Plan

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 - LA alerted to possibility of pupil having ALN.	Stage 2 - information gatheringInsert title of exchange 2	Stage 3 - Decision Making – ALN PanelInsert title of exchange 3	Stage 4 – Development of IDP Insert title of exchange 4	Stage 5 – Review of an IDPInsert title of exchange 5
1 Information exchange <i>General description of the process or stage to which the information sharing relates.</i>	<p>Where it is brought to its attention, or otherwise appears to a local authority that a child, who is at a school and for whom it is responsible, may have ALN, the local authority must decide whether or not the child has ALN.</p> <p>Where a child/young person or parent /guardian requests that the local authority responsible for the child reconsiders a decision made by a school that the pupil had ALN and requires an IDP.</p> <p>The school/agency or parent will share information with the LA ALN team to support their request to the LA.</p> <p>Please see chapter 2,4,11,13 and 15 – 20 and 23, 24 of ALN Code for wales for further details on the IDP process. Insert <u>brief</u> description of sharing at this point</p>	<p>A Person-centred planning meeting (PCP)– will be held to gather information on the pupils ALN needs. Involving all parties to share information to support the decision making at ALN panel.</p> <p>When deciding whether the child has ALN, the local authority must consider whether to seek advice from an educational psychologist.</p> <p>Information from a range of other professionals e.g. Health, Social care, other agencies involved is gathered</p>	<p>The ALN Panel reviews the information provided by all parties and is the LA decision making forum to decide if a pupil has ALN and requires additional learning provision (ALP). This will require an IDP that needs to be maintained.</p> <p>The panel is a multi-disciplinary forum made up of representatives for LA services/schools and other agencies.</p> <p>If the LA decides that a child at a school whom it is responsible has ALN it must either prepare an IDP or direct the school to prepare and maintain an IDP.</p> <p>If the LA decides that the child does not have ALN and does not require an LA IDP. The school can be directed to maintain the plan. Parents/pupil will be notified and rights to tribunal then apply.</p>	<p>The local Authority draft the IDP from the information shared as part of the PCP review and information gathering process. Only information gathered as part of the process can be included in the IDP.</p> <p>Before the IDP is completed, the local authority give parents /pupils an opportunity to comment on a draft and should encourage them to raise any concerns as soon as possible.</p> <p>The local authority should then consider any concerns and act upon them appropriately, which may be to update the draft IDP, or explain decisions or other matters</p> <p>The IDP will be finalised and will become a statutory document.</p>	<p>The LA have a duty to review the content of the IDP at least annually.</p> <p>A PCP review will take place (stage 2) and the information from the review fed into the LA.</p> <p>The LA will then update the IDP with any new/updated information.</p> <p>The Revised IDP will then be sent out the parents/Pupil and other agencies as per stage 4.</p>
2 What information will be shared? <i>Describe the information to be shared – you do not need to go to 'field level' detail.</i> Please note: <u>Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</u>	<p>Personal biographical Information Name Gender DOB Estyn Vulnerable group Exclusions and attendance ALN Status Description of ALN Involvement of other agencies LAC/CASP/CP Status Transition requirements Attainment data Attendance data Risk assessments/Positive handling plans Family / personal history / personal profile School IDPS/ALN plans from school. Views of pupil Views of parents List of professionals involved and contact information Demographic data</p>	<p>Basic Biographical information Pupil Profile Description of ALN PCP tools e.g. good day/bad day One-page profile Views of pupil Views of parents</p>	<p>Personal biographical Information Name Gender DOB Estyn Vulnerable group Exclusions and attendance ALN Status Description of ALN Involvement of other agencies LAC/CASP/CP Status Transition requirements Attainment data Attendance data Risk assessments/Positive handling plans Family / personal history / personal profile School IDPS/ALN plans from school. Views of pupil Views of parents</p>	<p>IDP: Basic Biographical information Responsibility for IDP Pupil Profile Description of ALN ALP requirements NHS ALP School /provision pupil will attend Record of key information to complete the IDP Timeline of key events Transition Travel arrangements.</p> <p>When giving a copy of the plan, the local authority must also give the child's parent:</p> <p>(a) contact details for the local authority; (b) information about how to access the local authority's arrangements for providing people with information and advice about ALN and the ALN system (c) details of the local authority's arrangements for the avoidance and resolution of disagreements²⁷ and its independent advocacy services; (d) information about the right to appeal to the Tribunal about particular aspects of the IDP.²⁹</p>	<p>IDP: Basic Biographical information Responsibility for IDP Pupil Profile Description of ALN ALP requirements NHS ALP School /provision pupil will attend Record of key information to complete the IDP Timeline of key events Transition Travel arrangements</p>

3	Partner Organisation(s) <i>Details of provider and recipient organisation(s) Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</i>	Who by	Who to	Who by	Who to	Who by	Who to	Who by	Who to	
		School TCBC Social Care ABUHCB health Board Parents/carers	TCBC Inclusion and Pupil Support Service	School TCBC Social Care ABUHCB health Board Parents/carers	TCBC Inclusion and Pupil Support Service	TCBC Inclusion and Pupil Support Service	School TCBC Social Care ABUHCB health Board Parents/carers	TCBC Inclusion and Pupil Support Service	School TCBC Social Care ABUHCB health Board Parents/carers	TCBC Inclusion and Pupil Support Service
4	How is information shared and what methods are used to keep the information secure? <i>Provide, in detail the specific agreed secure methods for sharing personal information</i>	Information shared with the LA is held on the Secure ONE system and a secure drive within the LA central IT service system. Information is only shared with those professionals who require the information to make a decision on the pupils ALN and IDP. Information given to parents / guardians as to processes and information sharing throughout IDP process. Families must be given information with regard to information sharing and who their information may be shared with at this point. . All communication between agencies is sent to designated email /postal addresses for the attention of the named contact. NOTE: Secure email exchanges such as TLS, if appropriate is used throughout Stage 1 – 5. Postal addresses and private (parent/guardian) email addresses which are not TLS have been checked beforehand for security.	Information shared with the LA is held on the Secure ONE system and secure drive within the LA central IT service system. Information is only shared with those professionals who require the information to make a decision on the [pupils ALN and IDP. Information given to parents / guardians as to processes and information sharing throughout IDP process. Families must be given information with regard to information sharing and who their information may be shared with at this point. . All communication between agencies is sent to designated email / postal addresses for the attention of the named contact NOTE: Secure email exchanges such as TLS, if appropriate is used throughout Stage 1 – 5. Postal addresses and private (parent/guardian) email addresses which are not TLS have been checked beforehand for security.	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NOTE: Secure email exchanges such as TLS, if appropriate is used throughout Stage 1 – 5. Postal addresses and private (parent/guardian) email addresses which are not TLS have been checked beforehand for security.	All communication between agencies is sent to designated email /postal addresses for the attention of the named contact. Information shared with the LA is held on the Secure ONE system and secure drive within the LA central IT service system. Information is only shared with those professionals who require the information to make a decision on the pupils ALN and IDP. Information given to parents / guardians as to processes and information sharing throughout IDP process. NOTE: Secure email exchanges such as TLS, if appropriate is used throughout Stage 1 – 5. Postal addresses and private (parent/guardian) email addresses which are not TLS have been checked beforehand for security.	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		5	Reliance on consent <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>	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people.. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people.. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people.. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people.. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon	Exchange relies on consent <input type="checkbox"/> Check Exchange does not rely on consent <input checked="" type="checkbox"/> Check Prior to bringing the request to the attention of the LA. The IDP process requires signed consent from the parent /legal guardian and young person for the process to begin . There is a consent form that is required to be filled in. . Consent for an IDP can be withdrawn please see ALNET chapter 4.26 for information on gaining consent of young people.. Consent is not the legal basis for processing of information. Other legal bases as outlined are relied upon
6	Notes for Practitioners			This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021	This is a statutory process and the ISP needs to be read in conjunction with the ALNET ACT 2018 and ALN Code 2021

Appendix C – Partner Organisations Signatures

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Appendix D – School Privacy Notices

Abersychan School

<https://www.abersychan.org.uk/GDPR/>

Blaenavon Heritage VC Primary School

<https://bhvcprimary.com/policies/>

Blenheim Road Community Primary

<https://federationbrce.com/gov/privacy-notice/>

Coed Eva Primary

https://drive.google.com/file/d/11hbCsubljEhfduShqjE_NkLWVJsNyMky/view

Croesyceiliog Primary

Privacy Notice not available online, please contact the school directly

Croesyceiliog School

<https://www.croesyceiliog.org.uk/privacy-cookies/>

Crownbridge School

<https://www.crownbridgeschool.co.uk/media/1153/privacy-notice-gdpr.pdf>

Cwmbran High

Please navigate to the Privacy Notice via the 'Information' link on the Home Page <http://www.cwmbranhighschool.co.uk/#>

Cwmffrdoer Primary

<http://www.cwmffrdoerprimary.co.uk/privacy-notice/>

Garnteg Primary

<http://www.garntegprimary.co.uk/privacy-policy/>

George Street Primary

<https://www.georgestreetprimary.co.uk/our-school/policies/>

Greenmeadow Primary

<https://www.greenmeadowprimaryschoolcwmbran.co.uk/parents-information/>

Griffithstown Primary School

<http://www.griffithstown-primary.co.uk/index.php?page=317>

Henllys Church in Wales Primary

Privacy Notice not available online, please contact the school directly

Llantarnam Community Primary School

<https://www.llantarnamcommunityprimary.co.uk/policies>

Llanyravon Primary

<https://www.llanyrafonprimary.co.uk/school-policies-inspection-reports/>

Maendy Primary

Privacy Notice not available online, please contact the school directly

Nant Celyn Primary

<https://www.nantcelynprimary.co.uk/school-policies/>

New Inn Primary

<https://www.newinnprimary.co.uk/policies/>

Our Lady of the Angels RC Primary

<https://www.ourladystorfaen.co.uk/privacy-notice/>

Padre Pio RC Primary

<https://www.padrepiorcprimary.co.uk/privacy-notice/>

Penygarn Community Primary

<https://www.penygarn.torfaen.sch.uk/about-us/policies/>

Ponthir Church in Wales Primary

<https://www.ponthirciw.co.uk/policies/>

Pontnewydd Primary

<https://www.pontnewyddprimaryschool.co.uk/policies/>

St Albans R.C. High School

<https://www.stalbans-pontypool.org.uk/wp/wp-content/uploads/Privacy-Notice-St-Albans-RC-High-School-1.pdf>

St Davids R.C. Primary

Privacy Notice not available online, please contact the school directly

Torfaen Pupil Referral Unit

[Torfaen Pupil Referral Unit Privacy Notice](#)

West Monmouth School

<http://westmonmouthschool.com/our-school/school-policies/>

Woodlands Community Primary School

<https://www.woodlandsprimaryschool.com/school-policies>

Ysgol Bryn Onnen

<https://www.ysgolbrynonnen.com/gwybodaeth-allweddol-key-information/>

Ysgol Gyfun Gwynllyw

<http://gwynllyw.weebly.com/polisiau--policies.html>

Ysgol Gymraeg Cwmbran

<https://www.ysgolgymraegcwmbbran.co.uk/en/about/policies-forms.php>

Headlands School

<https://www.headlandsschool.org.uk/privacy-policy/>

Talocher School

<https://www.priorychildrensservices.co.uk/privacy-cookies/>

Mynydd Haf School

<https://www.keys-group.co.uk/privacy-policy/>

Catch 22 Include Wales

<https://cdn.catch-22.org.uk/wp-content/uploads/2020/09/Privacy-Notice-CHIP-July-2020-v2.pdf>

Malpas Court Primary School

Privacy Notice not available online, please contact the school directly

This list is not exhaustive. If we need to use the services of another school or provider we will engage with them to sign the ISP at the commencement of their involvement with the child/young person.