



Family Support Information Sharing Policy

Introduction

Family Support works alongside families so that together we can help children and young people to be the very best they can be. We believe strongly that carefully looking after your personal information is really important. We respect your privacy and your right to confidentiality and we're committed to following the General Data Protection Regulations.

Much of our work involves working in partnership with other organisations so that children, young people and their families get the best services that we can provide. In working with others, we recognise that sometimes information needs to be shared and that equally there is a need to ensure information sharing takes place within a clear framework to protect the rights of service users.

The Information Sharing Policy ensures we share information in way that allows the organisation to operate in an effective and efficient manner while adhering to its statutory obligations.

Background and context to the Information Sharing Policy

The Information Sharing Policy sets out key principles that guide the way information is shared and applies to all information shared by Family Support. Information can be shared internally between service areas; as an established business activity where Family Support works in partnership with other organisations; or in response to requests for information that must be considered on a case by case basis i.e. Freedom of Information requests and subject access requests. Family Support has an overarching information sharing agreement with the London Borough of Hammersmith and Fulham.

Sharing personal information – the Information Classification and Protective Marking Policy sets out a system to identify personal and sensitive information that if compromised could put individuals at harm or risk. A simple explanation of the classification system is included below.

Classification type	Criteria for Classification
Unclassified	Includes information that is not personal or sensitive as defined by the General Data Protection Regulations and any information which is subject to disclosure

	under the terms of the Freedom of Information Act.
Internal	Includes information that can be considered personal or sensitive as defined by the Data Protection Act 1998 which could have a low to medium impact if the information is compromised.
Confidential	Includes information that can be considered personal or sensitive as defined by the Data Protection Act 1998 which could have a high impact if the information is compromised.

Aim of the Information Sharing policy

To outline the key principles of information sharing to ensure information is shared effectively and efficiently and statutory obligations are complied with.

Objectives of the policy

To ensure:

- employees understand their personal obligations when sharing information;
- employees understand how to share information safely and securely;
- fines for breaches of the General Data Protection regulations and the Freedom of Information Act 2000 are avoided; and
- Family Support maintains an effective and efficient service by sharing information with the partner organisations and the public while maintaining the security of its information.

Key principles of information sharing

Key principles of Information Sharing are set out below to guide Family Support employees when sharing information. It is the responsibility of Family Support employees to ensure they apply these principles when sharing information. For guidance on how to apply these principles refer the flowchart in Appendix 1.

- **Commitment to sharing information** – Family Support recognises that partnership working requires a commitment to sharing personal information in compliance with guidance and legislation. Family Support is committed to ensuring information is shared in accordance with its statutory duties, including the requirements of the General Data Protection regulations and the Human Rights Act 1998.
- **Information classification** – Prior to sharing information it should be classified and marked according to the Information Classification and Protective Marking Policy. Information classified as Internal or Confidential is subject to tighter information sharing considerations.
- **Caldicott requirements** – Family Support recognises the requirements that Caldicott Guidance imposes and will ensure that where relevant, information is shared in a manner in accordance with these requirements.

1. Justify the purpose(s)
2. Don't use personal confidential data unless it is absolutely necessary
3. Use the minimum necessary personal confidential data
4. Access to personal confidential data should be on a strict need-to-know basis.
5. Everyone with access to personal confidential data should be aware of their responsibilities
6. Comply with the law
7. The duty to share information can be as important as the duty to protect patient confidentiality.

- **Duty of confidentiality** – It is generally accepted that most (if not all) information provided by service users is confidential in nature. Family Support accepts this duty of confidentiality and will not disclose such information without the consent of the person concerned, unless there are statutory grounds and an overriding justification for doing so.

- **Consent** – Wherever possible Family Support will seek consent from service users to share personal information. If consent to disclose information is requested, the service user will be made fully aware of the information proposed to be shared and the purposes for which it will be used. If a person is unwilling to give consent, information will only be shared in exceptional circumstances and where there are appropriate statutory grounds for doing so. The decision to share information without consent must be approved by the relevant line manager. Consent must be fully recorded in the record of the person giving consent and the person's record for whom they have given consent (in the case of children). Consent must be explicit and should not be assumed unless agreed by the worker and team manager.

- **"Need to know"** – When information is shared the minimum information consistent with the purpose for sharing will be given.

- **Information that is kept confidential from the service user** – Family Support employees can request that information they supply about a service user is kept confidential from that service user. Such requests must be approved and documented by the relevant line manager.

- **Specific purpose** – Family Support will not misuse information that is disclosed to them for a specific purpose. Information shared with another organisation for a specific purpose will not be used as intelligence for the general use of the organisation.

- **Fact / opinion** – When disclosing information about an individual, Family Support employees will clearly state whether the information being supplied is fact, opinion, or a combination of both.

- **Use of anonymised information where possible** – When sharing information, personal information will be anonymised unless it has been agreed otherwise.

- **Employee awareness** – Family Support will ensure that all employees are aware of and comply with their responsibilities in relation to information sharing.

Privacy Notices (Fair Processing Notices)

All Family Support service users should be given, or directed to, the Family Support Privacy Notice. This is attached in Appendix 2. This notice details how, when and where Family Support information is shared with other organisations such as central government and partner agencies.

Non-compliance

Non-compliance with the Information Sharing Policy may lead to disciplinary procedures as set out in the Disciplinary Code of Conduct. Any breach of the Information Sharing Policy or any associated documents will be dealt with in accordance with those procedures.

Roles and responsibilities for implementing, monitoring and reviewing

This policy will be reviewed after a period of two years by Family Support to judge its effectiveness, or updated sooner in accordance with changes in legislation.

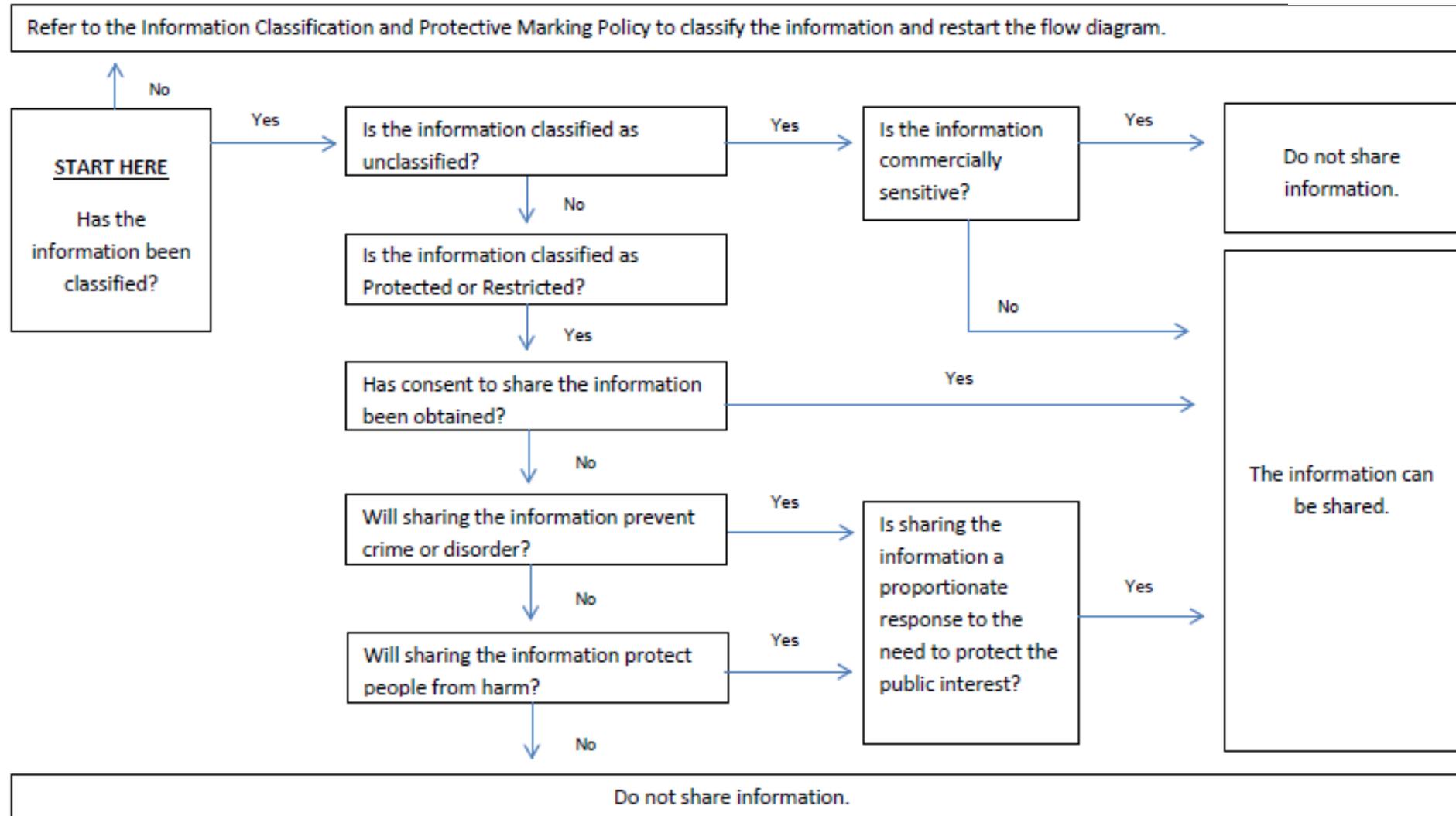
Information Governance Lead – Managing Director	<ul style="list-style-type: none"> • To develop and manage an information sharing agreement register for Family Support. • Ensuring all Freedom of Information requests are processed in accordance with the law and the London Borough of Hammersmith and Fulham Freedom of Information Procedure. • Ensuring all subject access requests are processed in accordance with the law • Ensures that any identified risks to data sharing are captured in the Family Support risk register. • Agrees all actions which mitigate the risks of sharing data unlawfully • Ensures appropriate resources are in place to ensure effective and safe sharing of information.
London Borough of Hammersmith ICT manager	<ul style="list-style-type: none"> • Ensure that secure email arrangements are in place for employees to safely share information with partner organisations and within Family Support, both in house and remotely
Line Managers	<ul style="list-style-type: none"> • Ensuring that the Information Sharing Policy is implemented and complied with in the department or service under their control. • Approving requests to share personal information without consent. • Approving requests to keep information about a service user confidential from that service user
All staff	<p>All employees should familiarise themselves with the Information Sharing Policy to:</p> <ul style="list-style-type: none"> • ensure they adhere to the information sharing policy; • ensure that they share information safely and securely; and • participate in relevant training and development.

This policy will be reviewed after a period of two years by Family Support to judge its effectiveness, or updated sooner in accordance with changes in legislation.

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Date created	
Signed by:	Peter Watt, Managing Director

Information Sharing Flowchart





Family Support Privacy Notice

Dear service user, parent, relative, partner organisation

As a provider of services to the London Borough of Hammersmith and Fulham, Family Support (along with other agencies such as schools) process information about children and young people to help administer services that support families and children. In doing so we must comply with the General Data Protection Regulations and Human Rights Act 1998.

This means (amongst other things) that the data held about families and children must only be used for specific purposes allowed by law. The following information explains the types of data held, why that data is held, and with whom it may be shared.

Types and use of data

We (Family Support) hold personal data about individuals, including; children in schools, children in our care / protection; or those children in need to whom we provide services. We collect and use data to:

- support children and monitor their progress;
- provide appropriate support and pastoral care;
- assess how effective Family Support services are;
- monitor progress and develop good practice in the services received;
- carry out specific functions (such as social care); and
- support children's/young people's development, teaching and learning.

This data includes personal characteristics, contact details, details of family and close relations, school curriculum assessment results and attendance information, characteristics such as ethnic group, special educational needs and any relevant medical information.

Sharing Data and Information

Central Government

Information may be shared with other agencies for statistical or research purposes only. Data is also used and passed on for specific purposes to the following agencies:

- Department for Education (DfE),
- Qualifications and Curriculum Authority (QCA),
- Office for Standards in Education, Children's Services and Skills (Ofsted)
- Department of Health (DH)

We may need to pass your information to external organisations and other service providers, but only where it is necessary or to comply with a legal obligation, or where permitted under the General Data Protection regulations. When disclosing personal data to a third party we will strive to ensure that the third party has sufficient procedures and systems in place to prevent the loss and unlawful use of that data. We have an overarching information sharing protocol agreed with other partners so you can be confident local partners all comply with the same privacy principles.

We may also share information with other bodies responsible for auditing or administering public funds, in order to prevent and detect fraud or crime. These third parties include the Audit Commission, the Department for Work and Pensions, other local authorities, HMRC and the police.

Information, consultation and advice Team (iCAT)

Sharing information about individuals with partner organisations is sometimes necessary in order to protect individuals if there are concerns they may be at risk of significant harm and to keep those individuals and the wider public safe. The iCAT is a service that we use, provided by the London Borough of Hammersmith and Fulham, that makes this sharing work in a way that carefully protects privacy and confidentiality and also safeguards children. The iCAT may, as part of its work, share information with partners such as:

- Social Care
- Metropolitan Police
- Health
- Probation
- Education and schools
- Housing
- Child and Adolescent Mental Health Services
- Youth Offending.

Information will be processed within iCAT under strict protocols in accordance with the General Data Protection Regulations and other relevant legislation. Information will be held securely by Family Support and will only be used and shared on a strict need to know basis with limited partners, for the purposes of keeping children or young people

safe or ensuring they get the best services they need. Personal information may also be shared if there is a lawful reason to do so, such as for crime prevention or detection purposes or where it is in the interest of maintaining public safety. The parent / carer will normally be informed at the time the enquiry is made unless this could place the child or someone else at further risk or undermine a police investigation.

Personal information held in the iCAT will be deleted when it is no longer needed for these purposes, in accordance with formal record retention policies.

All these are data controllers and are subject to the same legal constraints. Other disclosures may be made as required by law.

How we communicate

Wherever possible we use secure means to communicate our information. This is usually through the use of systems and databases that have very limited access and high levels of security to ensure the risk of data loss is minimised.

Where we send information, it is usually sent using secured data connections within Family Support and between partners. When we email information to external partners we use secure email processes wherever possible that encrypt information.

With the advent of new technologies methods of communication such as email and text messaging is becoming more widespread. Traditionally we have used the normal postal service to send information to our clients and service users. This may change in future. If you have a preference to receive your communications from us in alternative ways please liaise with your Family Support worker or school.

We also provide Family Support information in a variety of formats to assist users who have difficulty reading or for whom English is not their first language.

Whilst Family Support has a presence on Social Media we will never process, publish or communicate sensitive or personal information using these forums and would not enter into personal communications with any parties using these methods.

Data rights and access

As a data subject (or the parent or carer of a data subject), you have certain rights under the General Data Protection Regulations, including a general right to be given access to personal data held by any data controller.

The presumption is that by the age of 12 a child has sufficient maturity to understand their rights and to make an access request themselves if they wish. If you are a parent of a child younger than 12, you would normally be expected to make a request on their behalf.

For children and young people aged 13 years and over, a school is legally required to pass on certain information to us as the provider of youth support services in their area. The School must provide the name and address of the pupil and their parents and any further information relevant to the support services' role. In addition, dates of birth of pupils are supplied.

Parents of children up to the age of 16 can ask that no information beyond their children's name, address and date of birth (along with their own name and address) is

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passed to us. This right transfers to the pupil on their 16th birthday. You will need to inform the school if this is what you wish.

Accessing your data

For more information please contact your (or your child's) Family Support Worker or their school who will be able to give you more information.

If you wish to access your personal data, or that of your child, then please contact us at:

Peter Watt
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Family Support
Flora Gardens Children's Centre
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W6 0HP

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