

Shropshire Supporting Families through Early Help

Information Sharing Agreement



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Version History		
Version Number	Date	Description
0.10	April 2020	Amended to reflect the introduction of a new case management system (Liquid Logic and some changes to managing an Early Help Episode.
0.11	March 2023	Amended to reflect changes in the case management system. New structures within Early Help and change of the National Programme name to Supporting Families
1.0	February 2024	Amended to reflect the changes of the Programme Name in Shropshire to Shropshire Supporting Families through Early Help. To include the National Early Help Insights Data request from DfE and DHLUC.
1.1	October 2024	Amendments made to embed the Integration Consultation Panel and following feedback from Partner Agencies.



1. Shropshire Supporting Families through Early Help

Purpose of the Agreement

- 1.1 Shropshire Supporting Families through Early Help seeks to change the way that the public, private, voluntary and community sectors in Shropshire respond to families considered to be in need of Early Help and empower these families to live within their communities.

The aims of Shropshire's Supporting Families through Early Help are to:

- Support families who might need extra help to be happy, healthy and safe.
- Provide relevant, timely support to families.
- Work with families at the earliest stage to make positive changes and build their resilience, at the same time reducing the chance that they will need further support in the future.
- Provide more emphasis on allocating the right intervention to families with more complex needs and developing a shared responsibility to agree how this is delivered.
- To build resilient communities where children, young people and families know how to access support and interventions that may be required.

- 1.2 The key features of Shropshire's Supporting Families are:

- Understanding the needs of the whole family and ensure that these inform any support provided to the family and individuals within it.
- Providing the opportunity for the family to prioritise their needs, which means that the family has a say, where appropriate, over what support is delivered, to whom and when.
- Provides individualised support for family members.
- Working with the family to develop a family agreement and plan which is solution and outcome focused, identifying and building on existing strengths and providing practical help to tackle issues faced by the family.
- Ensuring that what is already known about a family (existing data, assessments and intelligence) is used to inform the development of the whole family plan.
- Workers are able to take an impartial view in the interests of the whole family.
- Flexibility in deploying resources where needed to meet family needs.



- Have clear mechanisms for measuring progress i.e. by listing actions/goals, stating who is responsible for which activity, providing timescales, asking family members to assess their progress.
- Ensures the voice of the family, including children and young people is heard and taken into account.

The intended outcomes of Shropshire Supporting Families through Early Help are:

Families and communities

- Improved family stability and ability to cope with everyday challenges.
- Improvement in outcomes e.g. adopting healthier lifestyles, improved educational achievement, gaining employment, improved mental health and reductions in crime and anti-social behaviour.
- Improved community cohesion – demonstrated by reductions in complaints, stability in housing tenure etc.

Services that better meet the needs of families with complex needs:

- Interventions that focus on tackling the underlying issues facing the family rather than just the presenting issues.
- Greater continuity of support with fewer professionals overall involved.
- Help to tackle issues before they escalate and prevent intergenerational patterns.

Financial outcomes:

- Providing effective support now to reduce the need for more costly services in the future (e.g. avoiding children coming into care, reducing numbers entering the criminal justice system, avoiding the need to access acute health services etc.).
- By reducing the number of multiple and repeat assessments carried out.



2. The Aims of this Information Sharing Agreement

- 2.1 The purpose of this Information Sharing Agreement (ISA) is to provide a framework to facilitate the appropriate sharing of information between Partner agencies in order to safeguard children, young people and their families in Shropshire.
- 2.2 This Information Sharing Agreement provides the basis upon which co-operating Partner Agencies will facilitate and govern the lawful sharing of information to ensure that agencies can work together to support families in need of Early Help, ensure they meet their identified outcomes and provide evidence of sustained progress for the National Supporting Families Programme and other wider Government initiatives.
- 2.2 This agreement will facilitate the exchange of information in order to:
- Understand the needs of the whole family.
 - Identify how best to engage with the family to understand their needs.
 - Identify what support is likely to be most effective in meeting the family's needs.
 - Co-ordinate the support that is provided by different agencies to families.
 - Track the outcomes achieved by families who are in receipt of Early Help to assist in evaluating the effectiveness of the programme and the wider Early Help Service.
 - Use Data Matching to identify families in need, bringing together data from Liquid Logic, Synergy Education Management System, Home Point, and other partner data streams to identify vulnerable families who may need some support.
 - To allow professional conversations that allow the sharing of information to promote a joined up, integrated approach. Thus, ensuring that families receive the right service at the right time.
- 2.3 This ISA provides good practice for the sharing of information between Partner Agencies in line with relevant legislation and is an enhancement to other established working practices. It is not intended to restrict the exchange of information and intelligence between operational staff employed by the partner agencies. They will continue to interact by face to face, telephone and electronically in order to carry out their operational duties and responsibilities. Such collaborative working will usually require documented procedures in addition to this Agreement. This will ensure that such information is exchanged in a lawful manner.



Documented procedures covering these circumstances must not circumvent this agreement.

The following organisations across the Early Help Partnership have been invited to sign up to the Case Management System of Liquid Logic through the Early Help Module (EHM);

- Internal Departments within Shropshire Council – e.g. Social Prescribing, Education Access Service.
- Education Providers such as Schools, Colleges and Early Years settings.
- Health Services such as;
 - Shropshire Community Health Trust which includes, Health Visitors, School Nurses and Family Nurse Partnership
 - Shrewsbury and Telford Hospital Trust (SATH)
 - Midlands Partnership NHS Foundation
- Emergency Services such as West Mercia Police and Shropshire Fire and
- Partner Agencies such as:
 - Commissioned Providers
 - Housing Providers
 - Voluntary Sector
 - Youth Activity Providers
 - Specialist services,

A list of organisations who are a party to this ISA and registered with the agreed Early Help case management system can be found on the Shropshire Early Help website.

3. Information Sharing

3.1 Risk assessment

- 3.1.1 It has been identified that there is a serious risk to safeguarding of children, young people and vulnerable adults if information relating to child protection or vulnerable adult's concerns is not shared. Not sharing information could result in a child, young person or vulnerable adult being left at risk of harm and mistreatment, which would have a negative or detrimental effect in the individual's health, wellbeing and safety. More generally, not sharing information can result in poorer outcomes for service users as the support provided is not based on a full picture of their needs and may not meet their needs.
- 3.1.2 The risk of sharing has the potential for challenge from service users, resulting in loss of confidence and the disengagement of service users.



Overall, the conclusion reached is that the benefits of sharing information for families outweigh the risk of not sharing information.

3.2 Anonymised information

The Data Protection Act 2018 places no restrictions on the disclosure of information that does not identify individuals. If de-personalised data can be used for information sharing, there will be no data protection implications. The parties to this ISA have examined whether the information can be anonymised so that it does not identify anyone. The conclusion is that the information needs to be personal information (where the individual can be identified) because there is a need to ensure that data matches accurately between databases to identify and track families.

3.3 Minimum information shared and identification of families.

- 3.3.1 The Partner Agencies agree to share the minimum information necessary to achieve the stated objectives of Supporting Families through Early Help, which includes the National Supporting Families Programme and subsequent/other government initiatives. Families identified as needing Early Help will be provided with relevant and timely support.
- 3.3.2 Information and relevant data relating to families in Shropshire who are in receipt of Early Help may be shared as a part of wider government initiatives and /or with Early Help Panels and Boards to ensure that families are accessing Early Help support at the earliest opportunity.
- 3.3.3 Personal data will only be shared where it is necessary, proportionate and justified to do so and on a 'need to know' basis. Partner Agencies will always consider alternatives to sharing personal data in the first instance, e.g., statistical, anonymised or pseudonymised information. For further information read 'Information Sharing; advice for practitioners providing safeguarding services to children, young people, parents and carers' HM Government, July 2018. [Information sharing: advice for practitioners \(publishing.service.gov.uk\)](https://publishing.service.gov.uk)
- 3.4.3 There may be other times where personal information and special category data may be shared with government agencies, for evaluation and research purposes only. The Public Service Delivery chapter of the Digital Economy Act 2017 allows specified bodies to share personal information for objectives which are set out in the regulations, including addressing "multiple disadvantages". Anonymised information sent back to Shropshire Council and/or is published will allow us to improve services. An example of where this information might be shared from the local authority to other



government and / or partner agencies for the purposes of evaluation and evidencing Early Help would be the National Supporting Families Programme, Turnaround Project and National Early Help Insights.

3.3.5 This ISA allows for the sharing of personalised and anonymous information in the following formats:

a. Written exchange of information between partner agencies

- delivered and/or received in person.
- at formal meetings/case conferences, Family meetings, professional meetings and / or family/community hub attendance where assessment, minutes or notes are produced, or actions are recorded.
- by recorded/special post
- secure electronic means, including the Early Help case management system Early Help Module of Liquid Logic.

b. Verbal exchange of information between partner agencies

- in person
- at formal meetings/case conferences, Family Meetings, professional meetings and/ or Family/Community Hub attendance.
- over the telephone
- Virtually e.g., Teams or Zoom

3.3.6 This ISA does not give license for unrestricted access to information another partner agency may hold. It provides the parameters for the safe and secure sharing of information for a justifiable 'need to know'.

3.3.7 Each partner agency must take responsibility for its own decisions to share or not to share as well as what information is appropriate to share. Partner agencies may choose to carry out risk assessments and/or Data Protection Impact assessments to aid their decision. In addition to this, Partner Agencies will consider the relevant legislation.

3.3.8 Where a Partner Agency to this ISA chooses not to share information, they must provide a full and clear written explanation of the reasons the sharing request has been refused, to the requesting partner.



3.4 Embedding of the principles of Lead Professional, Team Around the Family and whole family working across all services in the early help partnership, underpinned by the Early Help Assessment and Family Action Plan format and electronic inter-agency case management system, EHM.

3.4.1 To provide support for families' information is shared following the Shropshire Supporting Families through Early Help process. All families eligible for the Supporting Families Programme must have:

1. An assessment that considers the needs of the whole family.
2. An action plan that takes account of all (relevant) family members.
3. A lead professional for the family that is recognised by the family and other professionals involved with the family; and
4. Clear objectives, outcomes and measures identified in the family action plan.

3.4.2. To support this aim, where more than one practitioner within the Partnership is working with a family through early help, the Lead Professional will share the full information contained within the family's Early Help Assessment document with all practitioners in the Team Around the Family (TAF) process. Leaflets and a privacy notice are available to ensure families are informed about the sharing and use of information which will occur if they receive early help. It will be the responsibility of individual practitioners to discuss this with the family at the earliest opportunity to allow them to make a choice as to whether they wish to receive early help or not as there is not statutory requirement by law for the family to engage.

The overarching purpose of sharing information in this way will be to prevent the family from having to repeat their information to different practitioners, to deliver an effectively coordinated support plan for the family, and to improve inter-agency communication and safe practice through the use of a single family record of early help work.

3.4.3. A family agreement will be in place for all relevant members of the household that are accessing support from an Early Help Service, the 'Family Agreement to Access Early Help Support' form is available on the Early Help website.
<https://shropshire.gov.uk/early-help/practitioners/early-help-forms/>

Professionals should be open and honest with the individual (and/or their family where appropriate) from the outset about why, how and with whom information will, or could be shared.



The family agreement should also be signed by any child aged 13 or above (where they meet the 'Fraser guidelines' and are considered 'Gillick competent'), who is being supported directly. Young people have the right to support and confidentiality, a young person can decide the level of detail that is being shared with their parents. Young people need to be supported to fully understand the purpose of their information being stored and shared.

- 3.4.4 Where the family has had the privacy notice and information sharing explained to them and would like to receive early help but without information being shared with one or more specific agencies, the reasons for this should be fully explored by the practitioner.

The Lead Professional will need to consider whether the Early Help process is viable without sharing information with the named agency/agencies. If viable, the TAF process should continue, and the family's request should be accommodated for certain details not to be shared with specific agencies.

If the Lead Professional considers that the Early Help / TAF process is not viable without full sharing of information, alternative routes to support for the family will be considered including consultation with the Early Help Hub's, Integration Consultation Panels and Shropshire's First Point of Contact / Early Help and Support Team as appropriate to threshold/risk.

- 3.4.5 Where a multi-agency TAF is in progress, the full details of the Early Help Plan, family progress, and minutes of TAF meetings will be shared with all practitioners with the Team around the Family.

- 3.4.6. In the majority of instances practitioners in the Partnership will record and share the Early Help Assessment, Early Help Plan and TAF information on the Early Help Module (EHM), an inter-agency electronic case management system via web-link, though from time to time it may also be shared securely via email as a Word document.

- 3.4.7. All information within Early Help Assessments, Early Help Plans and minutes of TAF meetings will also be shared by Early Help Partner Agencies via EHM, under the same conditions outlined previously. The purpose of sharing this information will be to allow Shropshire Council to host an electronic inter-agency case management system and single-family early help record on behalf of the Partnership, and to allow Shropshire Council's Early Help Service to draw information from the system for reporting and analysis purposes on behalf of the Partnership.



- 3.4.8. Early Help Professional Meetings can be held to enable partners to discuss practical considerations and / or concerns without the family present. This might include workloads, gaps in provision, local solutions, funding needs and other Boards or Panels, e.g., Child Incident Triage or Child Exploitation Mapping Meetings.

All information should be treated with the utmost confidentiality.

Organisations represented at these meetings must have signed this ISA.

- 3.4.9 This ISA supports the recording of Group Work across Early Help, where Early Help Services deliver a group intervention to an individual or family, their attendance and progress information will be captured, recorded, and stored within the case management system – Liquid Logic.

- 3.4.10 There is no interfacing functionality between EHM and other Shropshire Council systems other than with Liquid logic LCS/LAS which store children's and adults' social care records. Early Help information stored on EHM family records will only be transferred to these systems where there is a justified need to do so, i.e. a safeguarding risk which requires attention from social care services has been identified.

In this scenario appropriate information must be manually selected and instructed for transfer, as EHM is a standalone system separate from LCS/LAS. Likewise, social care information held on LCS will only be transferred to EHM in the case that the family has closed to social care intervention and has indicated they wish to receive early help as step-down support.

- 3.4.11 All information recorded on EHM by a Partner Agency on an individual family's profile is accessible to all Partner Agencies granted access and actively working with this family. Every worker within EHM has a unique staff profile and the information inputted by the worker can be traced back to the individual agency sharing this information.

- 3.4.12 Information recorded within EHM by another agency can be used to support the action plan, assessments and wider support for the family.

3.5 Embedding of the activity of Early Help and Support Team (EHAST)



- 3.5.1. This ISA supports the work of Compass, EHASt and multi-agency information sharing that is an essential element of the Early Help process. Compass and EHASt are Shropshire's multi-agency hubs and are the single point of contact for receiving new safeguarding concerns or enquiries regarding the welfare and/or protection of children and young people in Shropshire.
- 3.5.2 Partner agencies will identify families that require Early Help or families may request Early Help support themselves, by either contacting First Point of Contact or by attending a Family/ Community Hub to request support.
- 3.5.3. EHASt record all their involvement and decision making on EHM. Early help information stored on EHM family records will only be transferred to LCS Social Care systems where there is a justified need to do so, i.e. a safeguarding risk which requires attention from social care services has been identified.
- 3.5.4. At the earliest opportunity the Compass / EHASt staff will share information with multi-agency partners regarding initial contacts and referrals received. Agencies agree to share information which they consider to be relevant and proportionate to the enquiry.
- 3.5.6 Practitioners in EHASt will have access to the Local Authority LCS (Children's Social Care), and EHM (Children's Early Help Module).

The Supporting Families Data Hub will match data sources and data sets available to the Supporting Families criteria surrounding a family, this will support decision making to ensure that the correct Early Help support, and interventions are offered at the earliest opportunity.

This will support joint working and it will ensure that sufficient information and data is available to the EHASt regarding individual children and families to allow safe and accurate guidance to be given in relation to intervention approaches and level of risk. EHASt will screen a family across systems as part of a consultation/ decision making process.

- 3.5.7 Compass/ EHASt will notify referring agencies about the outcome of the referral and any recommendations by an encrypted secure e-mail, this will be recorded within the EHM Case Management System.
- 3.5.8 All information recorded on EHM by a Partner Agency on an individual family's profile is accessible to all Partner Agencies granted access and actively working with this family. Every worker within EHM has a unique staff profile and the information inputted by the worker can be traced back to the individual agency sharing this information.



3.6 - Embedding the activity of Family Hubs in Shropshire

- 3.6.1 This ISA supports the work of the multi-agency Family Hubs, where personal information about a family is captured, recorded and stored within the case management system – EHM, and this information may be shared with other partner agencies to enable Early Help support to be provided to the family at the earliest opportunity.
- 3.6.2 Family Hubs may recommend the commencement of the TAF process at level 2 or level 3 early help to support a family and their identified needs. Other families may be signposted to relevant services.
Where necessary a family may be escalated to Children’s Social Care due to Safeguarding risks. All outcomes will be recorded within EHM and information shared with the relevant agencies identified to support the family.
- 3.6.4 All information recorded on EHM by a Partner Agency on an individual family’s profile is accessible to all Partner Agencies granted access and actively working with this family. Every worker within EHM has a unique staff profile and the information input by the worker can be traced back to the individual agency sharing this information.

3.7. Embedding the activity of the Integration Consultation Panel

- 3.7.1 This ISA supports the information sharing at the multi-agency Integration Consultation Panels. The teams involved in this panel will identify opportunities to work with families at an earlier stage and will improve the lives of families, children and young people and reduce the need for more specialist services across the council and the NHS. They will work with all sectors working with families, children, and young people to test out a new way of working, whilst also capturing the learning on what will best help families locally.
- 3.7.2 Families will be identified by Early Help Partner Agencies, this practitioner will discuss their concerns regarding the family and the referral to the integration panel, a family will agree to this referral so that the right support can be identified for the family. A written family agreement is required, as this is in line with ICO best practice, to ensure that a family has freely consented to



accessing this support and that they have been informed of how their personal information will be used.

Where a family has not agreed to be discussed at this forum, it is the referring agency/ practitioner's responsibility to explain to the family what their concerns are and if they feel in their professional opinion, there is a lawful basis for this information to be shared without the family's agreement, this must be explained to the family and recorded within the referral form.

- 3.7.3. Where a family's situation is shared at the Integration Consultation Panel, full information contained within the Early Help Assessment, Action Plan and Team Around the Family information will be shared with the consultation panel members and any other concerns that the presenting practitioner feels is relevant to the discussion. Other agency information may also be shared regarding the family from the partner agencies own system, if appropriate. Each partner agency remains the data controller for the information that they are sharing.
- 3.7.4 Following the Consultation Panel discussion, the referring agency is responsible for providing feedback to all families discussed.
- 3.7.5 All families referred to the Integration Consultation Panel, will have their personal information recorded on Liquid Logic EHM, under the legal basis of "public task" detailed in the Data Protection Act 2018 UK GDPR Article 6(e) and Article 9(2)(g).
- 3.7.6. Agendas will be coordinated by the Community and Family Hubs and circulated in advance via secure email. These will where possible use EHM reference numbers rather than client-identifiable details.
- 3.7.7 Discussion within the meeting will be bound by a confidentiality agreement read out at the beginning of each meeting, each member attending is confirming that details will not be shared outside of the meeting.
- 3.7.8 Panel members and practitioners attending the panel should not store information regarding the discussion on their own electronic or paper-based recording systems unless this is directly relevant in order for them to carry out the work with a family. In this scenario, they should record only details which are proportionate to their work and adhere to their own organisation's procedures.
- 3.7.9 All discussion notes, suggestions and actions will be recorded on the family's record on EHM for the purpose of record keeping, audit trail and context to



future conversations. The practitioner accessing this support may also record the consultation within their own organisation according to their own internal procedures.

3.7.10 All agencies represented at the Integration Consultation Panel must have signed this ISA.

3.7.11 All information recorded on EHM by a Partner Agency on an individual family's profile is accessible to all Partner Agencies granted access and actively working with this family. Every worker within EHM has a unique staff profile and the information inputted by the worker can be traced back to the individual agency sharing this information.

3.8. Sharing of information regarding individual families by practitioners to/from early help services for the purpose of advice guidance and consultation

3.8.1 Certain early help services will offer an advisory service e.g. CE Team and EHAST, to the Early Help Partnership to support the lead professional / practitioner in finding the most effective early help approach for families. The aim of this will be to drive high quality early help provision to families in Shropshire

3.8.2 The lead professional / practitioner contacting EHAST or other consultations will have ideally discussed this and the Supporting Families privacy notice with the family. The family may already have an open early help episode and Early Help Plan on EHM, which will have uploaded the recorded family agreement to receive early help services and will be accessible. However, there may also be scenarios from time to time where the practitioner is justified in contacting EHAST / Consultation Team in the interests of the welfare of the child but discussing the service and the privacy notice beforehand is not possible – for example where the practitioner is not yet actively working with a family and wishes to seek guidance on how to engage a family in conversations and/or support which would benefit the child.

3.8.3 Local Authority Childrens Services staff providing consultations will have access to the LCS (Children's Social Care) and EHM case management system. This will support the joint working and in order that sufficient information is available regarding the individual children and families to allow



safe and accurate guidance to be given in relation to intervention approach and level of risk.

3.8.9 Where client-identifiable details during a consultation for advice and guidance has been given, the conversation will be recorded on the family's record on EHM for the purpose of record keeping, audit trail and context to future conversations. The practitioner accessing this support may also record the consultation within their own organization according to their own internal procedures.

3.8.10 All information recorded on EHM by a Partner Agency on an individual family's profile is accessible to all Partner Agencies granted access and actively working with this family. Every worker within EHM has a unique staff profile and the information inputted by the worker can be traced back to the individual agency sharing this information.

3.9 Sharing of information by the Early Help Partner Agencies to support strategic and operational development of Early Help in Shropshire

3.9.1 The Early Help Family Hub's will be responsible for compiling intelligence regarding early help trends and themes in Shropshire and the early help Partnership Board will coordinate the multi-agency response to support the locality.

3.9.2 Data will likely be shared in this scenario via EHM Power BI Dashboards, other Local Authority owned systems or by a secure email to the Early Help Partnership Boards or other strategic boards where this information is relevant.

3.9.3 The purpose of sharing this information will either be to respond to need presenting within the county or to inform planning and development of services for families.

3.5 Legal provisions

Delivery of early help to families is not a statutory requirement by law and therefore families will always have a choice whether they wish to receive early help. Lead Professionals / Practitioners should discuss this choice, and the Supporting families privacy notice, with families transparently from the outset to inform their decision as to whether to receive early help services.



Families should understand explicitly what information lead professional /practitioners will request from them, why, and how and with whom it will be shared and stored. The Family Agreement to access early help services and understanding of the privacy notice will be recorded explicitly in writing within the Early Help Partnerships Agencies own organisation and again within EHM.

Families should be aware that if they choose to receive early help, their personal information will be collected and stored. The lawful basis for this it to comply with legal obligations and to carry out tasks in the public interest. They should also be aware that their information will be shared with Shropshire's COMPASS and Children's Social Care Team if a child is believed to be at risk of significant harm, in order to safeguard the child.

There is additional lawful basis for processing information for families who receive early help under:

The Children Act 2004, section 11, which places a duty on all members of the Early Help Partnership to share information to promote the wellbeing and safeguarding of children.

Statutory guidance Working Together to Safeguard Children 2023, which applies to all members of the Early Help Partnership and states that:

'Local organisations and agencies should have in place effective ways to identify emerging problems and potential unmet needs of individual children and families. Local authorities should work with organisations and agencies to develop joined-up early help services, which can be delivered through a Family Hub model where they exist, based on a clear understanding of local needs. No single practitioner can have a full picture of a child's needs and circumstances so effective sharing of information between practitioners, local organisations and agencies is essential for early identification of need, assessment, and service provision to keep children safe. All organisations and agencies should have arrangements in place that set out clearly the processes and the principles for sharing information.'

Digital Economy Act 2017

Under Section 35 of the Digital Economy Act 2017 the public service delivery power allows the sharing of personal data between partners listed in the Act for the purposes of:

- condition 1: the purpose is the improvement or targeting of a public service provided to individuals or households, or the facilitation of the provision of a benefit (whether or not financial) to individuals or households;
- condition 2: the purpose is the improvement of the well-being of individuals or household.



As such the purpose of Supporting Families through Early Help will apply to this and the data shared can be used for this overall objective and more specifically for identifying individuals or households who face multiple disadvantages. It will also enable the improvement or targeting of public services to such individuals or households and provide information for the monitoring and evaluation of programmes and other wider government initiatives.

This objective is key to successfully delivering the Supporting Families programme and other government initiatives.

Data under this power can only be shared between applicable partners for this purpose and cannot be used for any other purpose.

A list of partners this section covers will be listed on the Early Help website.

If a partner is not listed, they will not be able to share data under this provision and will have to find an alternative lawful basis on which to share data.

Other powers to share information

Section 115 of the Crime and Disorder Act 1998 which permits sharing to help prevent or detect crime and Section 8 of the National Audit Act 1983 which imposes a legal obligation on public bodies to provide relevant information to the National Audit Office.

Section 10 of the Children Act 2004 contains implied powers to share and obtain data in order to safeguard and promote the wellbeing of children.

Section 1 of the Localism Act 2011 provides a new power available to local authorities allowing them to do “anything that individuals generally may do.

Regardless as to whether an organisation has express or implied statutory powers, all personal data will be exchanged only as allowed by current law and only where justified, necessary and proportionate to meet the agreed objectives of this ISA. In particular, organisations and employees will comply with:

- Data Protection Act 2018
- General Data Protection Regulation
- The Human Rights Act 1998
- The Common Law Duty of Confidentiality



- Digital Economy Act 2017 (where applicable)

Each party will hold information as data controllers and must ensure that any processing of personal data for which they are responsible complies with the Data Protection Act 2018 and UK GDPR must ensure that any data shared is compliant with the Act.

This Act gives seven rights to individuals in respect of their own personal data held by others:

- Right of subject access.
- Right to prevent processing likely to cause damage or distress.
- Right to prevent processing for the purpose of direct marketing.
- Rights in relation to automated decision making.
- Right to take action for compensation if the individual suffers damage.
- Right to take action to rectify, block, erase or destroy inaccurate data.
- Right to make a request to the Information Commissioner for an assessment to be made as to whether any provision of the Act has been contravened.

In addition, the Act stipulates that anyone processing personal data comply with 6 principles of good practice outlined in Article 5 of the UK GDPR. These principles are legally enforceable:

- (a) processed lawfully, fairly and in a transparent manner in relation to individuals
- (b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- (c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- (d) accurate and, where necessary, kept up to date;
- (e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- (f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures

Any requests for information received by partners about information they are holding shall be processed by the receiving party.



<https://www.shropshire.gov.uk/media/13450/strengthening-families-through-early-helphttps://www.shropshire.gov.uk/media/13450/strengthening-families-through-early-help-legislation.pdf>

The UK General Data Protection Regulation (GDPR) sets out the conditions for processing Personal Data ([Articles 6](#)) and Special Category Data ([Article 9](#)).

In this case the relevant lawful conditions for sharing information between partners under the Data Protection Act 2018 for the purposes of the Supporting Families Programme through early help will be as follows:

UK GDPR Article 6(e) – the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.

UK GDPR Article 9(2)(g) – processing is necessary for reasons of substantial public interest.

- Schedule 1, Part 2, paragraph 6(1)(b) - the processing is necessary for reasons of substantial public interest

4. Types of information being shared

4.1 Parties to this ISA have not identified any legislation that will prevent the sharing of the information covered by this ISA.

4.2 Sensitive personal information

Applying the definitions of sensitive personal information as defined at section 2 of the Data Protection Act 2018, some sensitive information is to be shared within this ISA. It is essential that this information is shared to identify whether a family is likely to be suitable for, and benefit from, inclusion in the Supporting Families through Early Help programme. Sensitive information is also required to ensure that the programme is appropriately targeted and is not discriminating e.g., on grounds of ethnic origin.

4.3 Types of data that need to be shared;

Personal Data

- Name
- Age
- Gender
- Date of birth



- Address
- Contact details
- NHS number
- Unique Pupil Number

Special Categories of Personal Data

- Ethnicity
- Religion
- Language spoken
- Communication needs
- Disability or special needs
- Named health conditions where relevant to early help support needs
- Named convictions where relevant to early help support needs

Other (e.g. business sensitive data)

- Details of employment status
- Educational setting where applicable
- GP and health information
- Early help support needs and strengths in the family, including details of current and historical family situation
- Early help assessment and plan information – including details of actions being worked towards and progress being made Details of Team Around the Family meetings, including minutes and outcome of the meeting
- Details of agencies working with the family and services being offered to and/or accessed by the family, including details of appointments, home visits etc.
- Details of safeguarding concerns
- Details of educational attendance and exclusion where relevant to support needs
- Details of health conditions where relevant to support needs
- Details of convictions where relevant to support needs

- 4.4 Any Partner Agency that records information on a family's profile on EHM is responsible for ensuring that the information they record within the system is accurate and up to date. Any identifying changes in circumstances should be updated as soon as possible and no more than 2 working days to ensure that records are maintained appropriately.
- 4.5 If a Partner Agency identifies information that is incorrect within the family's profile on EHM and they are unable to edit / amend this, then the Partner agency is required to email SupportingFamiliesTeam@shropshire.gov.uk with the details immediately and no more than 2 working days.



5. Fairness and transparency

Fair processing notices

When disclosing personal information, many of the data protection issues surrounding disclosure can be avoided if the explicit consent of the individual concerned has been sought and obtained in writing. So far as is practical, the lead professional will provide or make readily available the following information as soon as is practicably possible to the family they are working with:

Identity – If it is not readily apparent, the individual(s) must be informed of the name of the organisation / business area collecting the information along with contact details such as a telephone number.

Purposes of the Processing – It must be very clear why the information is needed and how it will be used. Providing this information means there will be no hidden surprises about how a person's information is used.

Whom information will be sought from – Make it very clear what information will be sought from what organisation and why it is needed/how it will be used.

Whom information will be shared with – Make it very clear who the information will be shared with and why. Data will be shared to support families, to improve outcomes, minimize risk and improve the safety of partners.

How information will be stored – where and how information will be stored.

6. Quality assurance

Everyone who works within children's social care and wider children's services has an important contribution to make to ensure we do the best we can for the children and families we work with. We have worked hard to embed our Quality Assurance Framework and raise our standards for practice, changing the culture within children's services to ensure that work is completed in a timely way and that expectations for quality is understood.

As part of our quality assurance process, agencies who have signed up to this ISA may be invited to be involved in the auditing of individual cases and therefore



have time limited access to a case other than their own, their access to this case will be removed once the audit is complete.

Recommendations based on learning from audit activity will be shared with Partner Agencies to facilitate improvement in their practice; no identifiable information will be shared.

Key Contacts –

Siobhan Hughes

Service Manager for Early Help

Siobhan.hughes@shropshire.gov.uk

Information Governance Team

Shropshire Council

Information.Request@shropshire.gov.uk

7. Retention of shared information

Parties to this ISA understand that the information shared should not be held indefinitely. It should only be retained for as long as it is needed in accordance with each party's retention schedule. Article 5 (e) of the GDPR states personal data shall be kept no longer than is necessary for the purposes of which it is being processed. There are some circumstances where we may store data for longer periods (e.g., archiving purposes in the public interest).

Signatories to this ISA must therefore ensure personal data is securely disposed of when no longer needed.

8. Security of shared information

Parties to this ISA understand and are fully committed towards ensuring that adequate safeguards are put in place ensuring the safety and security of all the personal information shared.

8.1 Identify/evaluate risk

The key consideration of all parties to this agreement is to make sure that their security is adequate in relation to the damage to individuals that a security breach, loss or misuse of information would cause. More sensitive or confidential information therefore needs a higher level of security. However, rather than having different security standards for different pieces of information, Parties agree to adopt a 'highest common denominator' approach, that is, to afford all the information shared a high level of security. Log in details to case management systems will be individually allocated and not shared under any circumstances.



Access to EHM will only be given to individuals with a unique, personal, organisational e-mail address e.g. Harry.Potter@hogwartsnursery.com. The e-mail address should not be shared by any other person.

8.2 Secure exchange of information

8.2.1 Who will have access?

Shropshire Council will host Liquid Logic EHM case management system, and Early Help Partnership Agencies will have individual staff members that will be granted access to the system.

A list of organisations who are a party to this ISA and registered with the agreed EHM case management system can be found on the Shropshire Early Help website.

Access will be granted under the following conditions;

- Early Help Partner Agencies will have signed this ISA and nominated staff from their organisation to access EHM.
- These nominated staff members will have completed the EHM training to ensure that EHM users are aware of their responsibilities.
- Partners will request access to an individual family's Early Help Active Episode record on EHM, for the family that they are working with, and this will be granted by internal Shropshire Council staff. Partners will not have open access to a family's main demographics pages. This access can only be granted by the Supporting Families Business Support Team, Early Help Managers or the Lead Professional of the case if they are within the Targeted Early Help Team.
- When support has ceased by the partner agency, it is the partner agencies responsibility to inform the Supporting Families Team – supportingfamiliesteam@shropshire.gov.uk and their access will be removed from the family's profile.
- If a family requests access to be removed for a Partner Agency the Supporting Families Team will remove this access, within 48 hours of being notified, and inform the partner agency of the family's decision.

If a Partner Agency has any access issues, they can contact the Supporting Families Team for advice and guidance on supportingfamiliesteam@shropshire.gov.uk

8.2.2 Information will be shared in the following formats:

- a. Written exchange of information between Partner Agencies can be;



- delivered and/or received in person or distributed at formal meetings/case conferences and Family Meetings where minutes or notes are produced, or actions are recorded
 - delivered by recorded/special post or delivered by secure electronic means, via a secure network or by a secure or encrypted e-mail. Practitioners must always follow their organisation's policy on security for handling personal information.
 - By case notes or documents uploaded onto the case management system (Early Help Module (EHM) Liquid Logic)
- b. Verbal exchange of information between Partner Agencies can be;
- in person
 - In attendance at a Family Hub
 - at formal meetings/case conferences and Family Meetings
 - over the telephone.
- c. Shared access to systems;
- Name staff within the Early Help Partnership will be granted access to EHM, hosted by Shropshire Council to record, store and share early help information relating to the specific families they are actively working with. This will be to support the direct intervention with families.

8.2.2. **How often will the information be shared?**

Frequency of sharing will depend on the activity;

- Sharing for compilation of reporting – Monthly / quarterly
- Sharing with other practitioners within the Team around the Family process – may be as frequently as daily.
- Sharing Information, Advice and Guidance through a consultation early help team – as and when required
- Sharing with the Integration Consultation Panel – as and when required
- Sharing with EHASt – as and when required
- Sharing to support strategic / operational development work – as required on a task-by-task basis.

Partners must ensure the secure exchange of information.



8.3 Secure storage of information

8.3.1. In the vast majority of instances information will not be stored on paper by practitioners across the Early Help Partnership. Where it is, this would need to be stored in a secure cabinet facility and destroyed immediately after use via confidential waste arrangements within the organisation.

8.3.2. Where paper copies of the Early Help Assessment, Action Plan or TAF information has been given to the families, it will become the responsibility of the family to store their information securely.

8.3.3 Electronic information will be stored securely in EHM.

8.3.4. The only instances where data might be taken off-site are:

- a. when a lead professional/partner agency worker hands paper copies to a family for their records and the family takes these off-site. In this case protection of the data becomes the responsibility of the family.
- b. when a lead professional / partner agency worker prints a paper copy to take with them to a meeting with the family or with the Team Around the Family. In this case, staff will need to take responsibility according to their own organisation's procedures for transporting the information appropriately and disposing securely of the paper copy when no longer required.

8.3.5 All users will be required to undertake EHM training delivered by Shropshire Council and this (together with user guidance documents) will make users aware of the responsibilities and hazards of printing paper copies. Practitioners will be encouraged to avoid doing this wherever possible.

8.3.6. By signing this ISA, All Partners Agencies are agreeing to put in place procedures governing the secure storage of all personal information retained within their manual or electronic systems to comply with principle 6 of the Data Protection Act 2018. Security requirements will include:

- Appropriate security management (e.g. policies, procedures, staff training)
- Appropriate access controls to electronic and manual systems.
- Appropriate physical and environmental security to buildings and other hardware.
- Appropriate back up and disaster recovery systems.

8.3.7 Information stored and shared via EHM by partners will be protected by the following security measures:

- Username, password and secure multifactor authentication email
- Access/log-in details for EHM granted only to users confirmed to have completed the EHM Me Learning Modules.
- Access granted to individual family records by the Supporting Families Team, the Early Help Hub Team or Lead Professionals only where an



early help episode is open and the practitioner requesting access is known to be actively working with the family.

- Access/log-in details granted only where practitioners are confirmed to have completed data and security training and their organisation's are confirmed to have valid policies and processes to ensure staff are aware of their responsibilities. Evidence of such may be requested and would need to be shown to the Council's as and when requested.
- Disabling of account where the user has not had an open episode for 12 months or where there is suspicion that the user's account has been compromised or found to be carrying out activity that may be deemed as suspicious or malicious.
- Lock-down of user accounts by Shropshire Council in the event that Shropshire Council is nominated of possible unauthorised access, e.g. if a partner device used to access EHM or login details are lost.
- Security levels to ensure that the access and recording rights of users are tightly controlled.
- Running of regular reports to detect and take action in relation to any unauthorised use of granting access to individual family records.

8.3.8 As host of EHM, Shropshire Council's Supporting Families through Early Help Team will make available via the Early Help Website and Leap into Learning:

- Training to practitioners in use of the system
- User guidance documents online
- Practical assistance with use of the system via the Supporting Families Business Support Officers
- Access to individual family records granted on a manual basis on request from an authorised practitioner, and access removed when work with the family has completed.
- Maintenance of data quality including an annual data cleanse.
- Maintenance of user accounts, e.g. passwords and creating/deleting accounts
- Liaison with the supplier, Liquid Logic
- Production of Management Information reports

8.3.9 As host of EHM, Shropshire Council's will be responsible for the processing of information on behalf of all Early Help Partners that have signed this ISA and Shropshire Council is responsible for letting partners know if there is a problem with the EHM system.



8.4 Mandatory safeguards

- 8.4.1 All parties should ensure that their workforce have access to and have read; 'Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers' HM Government, July 2018.

https://www.shropshire.gov.uk/media/13449/information_sharing_advice_practitioners_safeguarding_services.pdf

- 8.4.2 All parties to this ISA give assurances that any staff who access and process the shared information within EHM:

- Understand they have an obligation to safeguard and protect the information shared by maintaining appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

For example:

- Ensure that unauthorised staff and other individuals are prevented from gaining access to personal information held electronically.
- Ensuring that staff receive appropriate data protection training to enable them to understand the risks surrounding information security and what safeguards they can take to protect information.
- Ensure any paper copies of information are stored in securely and only accessed by those who need to use them.
- Notify the Supporting Families through Early Help Team of staff leaving and remove their permissions to access any information previously available to them.
- If at any time the organisation wishes to withdraw from this protocol they should notify the Supporting Families Team (supportingfamielsteam@shropshire.gov.uk) who will remove authorisation to share and notify partners.

- 8.4.3 All partners that have signed this ISA, have a responsibility to ensure that the individual from their organisation will record accurate and up to date information within the EHM system.

- 8.4.4 The Partner shall ensure that they inform all their employees, agents, sub-contractors or third parties who are required to access confidential, sensitive or personal information pursuant to this ISA are informed of the confidential nature of the information received and comply with the obligations of confidentiality and obligations of security of information set out in this ISA,



and where the agent, sub-contractors or third parties does not become a Partner Agency this shall be effected by the signature of a confidentiality agreement prior to the disclosure by the Partner of any such information to such a third party.

9. Indemnity and limits on liability

- 9.1 A Partner (“the Defaulting Partner”) shall indemnify the other Partner Agencies against all liabilities, costs, expenses, damages and losses, suffered or incurred by a Partner Agency, arising out of or in connection with any claim made for actual or alleged infringement by the Defaulting Partner of their obligations to comply with the Data Protection Act 2018 arising out of, or in connection with, the sharing, use, retention and recording of personal and sensitive personal data for the purposes of this ISA.
- 9.2 Subject to the following clauses, in no event shall the aggregate liability of any Partner (whether in contract, tort (including negligence or otherwise) and in respect of all claims, losses and damages arising under or in connection with this ISA exceed £50,000.00 under this ISA during the 6 month period before the date on which the loss or damage giving rise the claim arose.
- 9.3 The above limits on liability shall not apply in respect of any indemnities provided by a Partner under this ISA.
- 9.4 Each Partner's liability to the other in contract, tort (including negligence), misrepresentation (whether innocent or negligent), breach of statutory duty or otherwise arising out of or in connection with this ISA shall not extend to any loss of profits, loss of business opportunity, loss of goodwill, loss of data, loss of anticipated savings or any special, indirect or consequential loss or damage whatsoever.
- 9.5 Notwithstanding the above or other limitations and exclusions of liability set out in this ISA, no Partner excludes or limits any liability for:
- personal injury (including sickness and death) to the extent that such injury results from the negligence or willful default of a party or its employees; or
 - fraud or fraudulent misrepresentation; or
 - any other liability to the extent the same cannot be excluded or limited by law.



10. Access to personal information and Freedom of Information

10.1 Handling requests for information

- 10.1.1 All parties to this ISA recognise their obligations under the Data Protection Act (DPA) and where the party is a public body as defined in Schedule 1 of the Freedom of Information Act 2000, Freedom of Information Act (FOIA) and Environmental Information Regulations, to supply individuals with information upon request, subject to certain conditions and exemptions.
- 10.1.2. All parties have agreed that if any organisation receives a request from an individual to access any of the information relating to this ISA it is the organisation's responsibility to process the request.
- 10.1.3 Should an information request have originated from another party to this ISA then they will be contacted within 5 days of receiving the request and views sought on whether the information should be disclosed or whether there are any reasons for the information being exempt from disclosure.
- 10.1.4 If a member of the public requests a full copy of the signed information sharing agreement, neither party to this ISA has any objections to a full copy being released.

11. Breaches of the Agreement

11.1 - Indemnity Clause

- 11.1.1. The Partners agree to indemnify each other in the following terms.
- 11.1.2 To ensure that the liability for any breach of this ISA rests with the organisation responsible for that breach alone, the Partners will not accept liability for any loss, unauthorised breach of confidentiality or any breach of terms of this agreement by any employee of another Partner, including the following acts or omissions:
- a. Requests for and disclosure of information for purposes other than those specified in the agreement.
 - b. Use of the information for purposes other than those specified in the agreement.
 - c. Disclosure of the information to a third party except as specified in the agreement.



- d. Handling, recording, storing or disposal of information otherwise than in accordance with the agreement whether negligently or otherwise.
- e. Loss or compromise of the information

11. 2 Warrant and Wavier

- 11.2.1 Each party to this agreement is responsible for their own adherence to data protection legislation.
- 11.2.2 The parties agree to jointly review this agreement and all sharing arrangements in the event of a data breach.

11. 3 Reporting and Managing Personal Data Breaches

- 11.3.1 All parties signing up to this agreement must ensure they have a robust procedure in place for responding to breaches of personal information. Including but not limited to the following points;
- 11.3.2 Any personal data breach must be reported to the Data Protection Officer of the organisation responsible for the breach immediately, and no longer than 24 hours of the incident, giving the details of the incident. Such notifications shall be between respective Information Governance Departments within each organisation.
- 11.3.3 The Partner Agency responsible for the breach must report this to the Local Authority's Data Protection Officer at information.request@shropshire.gov.uk within 24 hours, as Shropshire Council is the host for EHM and will have access to the key contact details for each partner agency.
- 11.3.4 All serious incidents will be reported to the ICO by the relevant Data Protection Officer with 72 hours.
- 11.3.5 The Data Protection Officer of the organisation responsible for the breach must inform any other Data Controller affected so they can take appropriate steps.
- 11.3.6 As the host of EHM, Shropshire Council is responsible for letting the partner agencies know if there is a problem with the EHM system.

12. Review

This ISA will be reviewed by all parties every three years or sooner should circumstances warrant it. Next review date is January 2028



Each review will examine whether:

- The sharing of information is having the desired effect.
- Fair processing information still provides an accurate explanation of the information sharing activity.
- Procedures for ensuring the quality of information are being adhered to and are working in practice.
- Retention periods are being adhered to and continue to reflect business need.
- Security remains adequate and, if not, whether any security breaches have been investigated and acted upon.
- Individuals are being given access to all the information they are entitled to, and that they are finding it easy to exercise their rights.

13. Termination

Any partner to this ISA may, by providing one month's written notice, terminate their involvement in this ISA and without liability for compensation or damage (except as mentioned in this ISA).

Written notice should be sent to Service Manager - Early Help, Shropshire Council, Guildhall, Shrewsbury SY3 8HQ



Shropshire Supporting Families Through Early Help Information Sharing Agreement

Version 1.1 –October 2024

Signatories

By signing this ISA, the Partner Agency agrees to implement the terms and conditions stated in this Agreement and confirms they have read and understand the indemnity provisions. They will have also read, and understood the 'Information Sharing; Advice for practitioners providing safeguarding services to children, young people, parents and carers' HM Government, July 2018

https://www.shropshire.gov.uk/media/13449/information_sharing_advice_practitioners_safeguarding_services.pdf and made this available to all practitioners who have a responsibility to share information.

All parties to this ISA give assurances that any staff who process the shared information:

- Understand they have an obligation to safeguard and protect the information shared by maintaining appropriate technical and organisational measures against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

For example:

- Ensure that unauthorised staff and other individuals are prevented from gaining access to personal information held electronically.
- Ensuring that staff receive appropriate data protection training to enable them to understand the risks surrounding information security and what safeguards they can take to protect information.
- Ensure any paper copies of information are stored securely and only accessed by those who need to use them.
- Notify the Supporting Families through Early Help Team of staff leaving and remove their permissions to access any information previously available to them.
- If at any time the organisation wishes to withdraw from this protocol, they should notify the Supporting Families Team who will remove authorisation to share and notify partners.
- Information that is disclosed to a partner must not be further disclosed to another supplier / agency without the prior written consent of the council (whereby this Information sharing Agreement will be amended to reflect the changes)



- The information disclosed must only be processed in accordance with this agreement.
- Any information that has been lost, stolen, disclosed, misused or mishandled in any way will be reported to the Council's Information Governance Team immediately. The partner will work with the council to investigate the incident and work with the council to report the matter to the data subject, the Information Commissioner's Office and any other regulatory bodies (if necessary).

Signature.....

Name.....

Title.....

Organisation.....

Date.....

Details of staff members who have access / require access to the system;

Name	Job Title

Please complete and return to: SupportingFamiliesTeam@shropshire.gov.uk

If you require further information, please either email or phone Supporting Families
01743 253921

