



**London Borough  
of Hounslow**

## **Information Sharing Agreement**

**between**

**Members of the Hounslow Early Help Partnership – **Name  
of School** and London Borough of Hounslow**

**2019-2021**

The following Information Sharing Agreement is between London Borough of Hounslow and the member of the Early Help Partnership **name of school**:

1) **London Borough of Hounslow (Partnership host), Interim Director of Children's Services**

2) **Name of school, title**

Under this agreement, all parties are Data Controllers as defined under the Data Protection Act and GDPR.

This agreement should be read in conjunction with:

- Hounslow Early Help Partnership Strategy 2019-2021
- Hounslow Early Help Partnership Performance & Impact Framework
- Data Privacy Impact Assessment - roll-out of Liquidlogic Early Help Module to partners external to the Council

## 1. Purpose of the agreement

- 1.1 London Borough of Hounslow (LBH) and partners have committed to the development of a new Early Help Partnership Commitment 2019-2021 as a Hounslow Early Help Partnership (HEHP). To deliver the aims and activities outlined in the Commitment sharing information will be required, both between members of the HEHP in their work with families and between members of the HEHP and LBH specifically in its role as co-ordinator/host of the Partnership and the Early Help Hub.
- 1.2 While some of this information may be shared anonymously, in other scenarios personal information will need to be shared. This will either be in order to support direct intervention with a specific family or in order that clients may be matched across databases to monitor and evaluate progress/outcomes. The risks of not sharing personal information include inability to deliver the strategy and ultimately poorer outcomes and increased risk to safety or wellbeing of children, young people and families.
- 1.3 The purpose of this Commitment is to provide governance and a common understanding of the parameters the Partnership has agreed for sharing information to deliver the strategy. It does not give license for unrestricted access to information that services may hold, and each member of the HEHP will take responsibility for its own decisions in relation to the information it shares or does not share.
- 1.4 HEHP members agree by signing this Agreement to share the information necessary to support the specific activities outlined below. Additional activities requiring the sharing of information within the Partnership may also be necessary from time to time during the life of the Strategy and will be agreed with the HEHP at the Early Help Strategy Group.

### **Activity 1: Development of a Partnership Early Help Performance & Impact Framework.**

- 1.5 A partnership Early Help Performance & Impact Framework will be developed to enable

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**Author:** Information Governance

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the HEHP to monitor and evaluate collective early help performance and impact of the Early Help Strategy. This will require the sharing of data from HEHP members to LBH Children's Performance & Data team to enable reporting against the Framework.

- 1.6 The framework will be reported to the Early Help Strategy Group quarterly for the purpose of monitoring and evaluation, and for taking collective action to ensure robust performance. Elements will be reported to LBH Corporate Leadership Team and Members for the same purpose and these are indicated within the Framework. Services and organisations within the Early Help Partnership may wish to share reporting of the Framework within their own services and organisations to inform their own work.
- 1.7 The format of the Framework and the data required from services to compile it will be as agreed by members of the HEHP at the Early Help Strategy Group and may change from time to time throughout the life of this Agreement. However, the Framework will at the time of writing this Agreement require the following information:
- **Caseload activity** – numbers open, numbers closed, number on waiting lists
  - **Throughput** – entry routes of clients into the early help system (e.g. through MASH, through Early Help Panel, step-down from social care)
  - **Characteristics of families receiving early help** – gender, age, disability, ethnicity, locality, presenting needs
  - **Outcomes of Early Help Plans and Team Around the Family** – defined in terms of 'needs met/outcomes achieved', 'escalated to specialist services', 'participation of the family withdrawn', 'moved out of borough'
  - **Service performance against selected national and local indicators**
  - **Case studies**

This data will be published in the Framework in non-client identifiable format.

- 1.8 The information in 1.7 will be obtained by the LBH Children's Performance & Data team either:
- from the electronic inter-agency case management system Early Help Module (EHM) which will be hosted on behalf of the Partnership by LBH,
  - from other electronic case management systems owned by LBH, for example EMS
  - or via submission using secure e-mail to the LBH Children's Performance & Data team on agreed dates quarterly.

**Activity 2: Embedding of the principles of Lead Professional, Team Around the Family and whole family working across all services in the partnership, underpinned by a new inter-agency Early Help Family Assessment and Early Help Family Plan format and electronic inter-agency case management system.**

- 1.9 Statutory guidance [Working Together to Safeguard Children 2018](#) recommends that 'where a child and family would benefit from co-ordinated support from more than one organisation or agency (e.g. education, health, housing, police) there should be an inter-agency assessment...a lead practitioner should undertake the assessment...and co-ordinate the delivery of support services'.
- 1.10 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 CFAN document with all practitioners in the Team Around the Family (TAF). Leaflets and a privacy notice for the HEHP will be 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.

- 1.11 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 co-ordinated 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.
- 1.12 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 CFAN/TAF process is viable without sharing information with the named agency/agencies. If viable, the CFAN and 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 CFAN/TAF process is not viable without full sharing of information, alternative routes to support for the family will be considered including consultation with the LBH Early Help Hub and LBH Children's front door as appropriate to threshold/risk.
- 1.13 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 in the TAF under the same principles outlined above.
- 1.14 In the majority of instances practitioners in the Partnership will record and share CFAN, 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, or potentially as an e-form - for example if there is no access to EHM or there is an EHM malfunction.
- 1.15 All information within CFANs, Early Help Plans and minutes of TAF meetings will also be shared by HEHP members with LBH in their specific role as host of the Partnership via EHM, under the same conditions outlined previously. The purpose of sharing this information will be to allow LBH to host an electronic inter-agency case management system and single family early help record on behalf of the Partnership, and to allow LBH to draw information from the system for reporting and analysis purposes on behalf of the Partnership (for example compilation of the Performance & Impact Framework, or for Quality Assurance). A Data Privacy Impact Assessment has been undertaken in respect of inter-agency use of EHM.
- 1.16 As host of EHM, LBH will make available via the Early Help Hub and LBH Children's Data, ICT and Systems Operation Teams:
  - Training to practitioners in use of the system
  - User guidance documents online
  - Practical assistance with use of the system
  - 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 in accordance with LBH policy
  - Maintenance of user accounts, e.g. passwords and creating/deleting accounts
  - Liaison with the supplier, Liquidlogic
  - Production of Management Information reports

- 1.17 Information stored and shared via EHM by partners will be protected by the following security measures:
- Username, password and secure 1xToken Access multifactor authentication (through work email)
  - Access/log-in details for EHM granted only to users confirmed to have the valid DBS clearance in place
  - Access granted to individual family records by the Early Help Hub or Lead Professionals only where an early help episode is open and the practitioner is actively working with the family
  - Access/log-in details granted only where practitioners are confirmed to have completed data and security training and their organisations 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 6 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 by ICT Security.
  - Data retention in accordance with the LBH policy:  
[http://intranet.hounslow.gov.uk/chas\\_retention\\_schedule\\_electronic\\_paper\\_records\\_oct18.pdf](http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf)
  - Encryption of data stored on EHM and daily back-up, facilitated by Liquidlogic
  - Lock-down of user accounts by LBH in the event that LBH 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
- 1.18 There is no interfacing functionality between EHM and other LBH systems other than with Liquidlogic 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.
- 1.19 Members of the HEHP agree to provide to LBH the following in respect of use of EHM by their practitioners before access is granted to the system:
- Confirmation from an appropriate senior manager that practitioners have a valid enhanced DBS clearance
  - Confirmation that practitioners have completed data protection and security training
  - Confirmation that the organisation has valid processes and policies in place to ensure staff are aware of their responsibilities in relation to data protection and security
  - Confirmation of ICO registration number
- 1.20 Members of the HEHP agree to refrain from unauthorised sharing of information on EHM outside the parameters of this agreement.

### **Activity 3: Operation of multi-agency Community Action Partnership Panels**

- 1.21 The purpose of a Community Action Partnership Panel, or other form of Early Help

London Borough of Hounslow's Information Sharing Agreement version 2

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Panel, is to discuss a family's situation with a range of multi-agency partners in a single forum. This may take place where the Lead Professional (who may be from any HEHP service) requires guidance from others to support the family effectively, or where the family would benefit from securing additional multi-agency resources to support them.

1.22 The family may be nominated for discussion at the Panel only on condition of a prior discussion with them, which will have taken place either:

- **with the Lead Professional working with them** – via conversation and recording in writing on the CFAN/EHM.
- **by the LBH Children's Services front door/MASH** as a result of a contact made for the family, where the best outcome is agreed to be discussion at Panel –via conversation with the family and recorded in writing on LCS.
- **by the FFISS Early Help Co-ordinator** when having screened the family's CFAN for the LBH Access to Interventions Panel the best outcome is agreed to be discussion at an Early Help Panel –via conversation with the family and recorded in writing on EHM.
- **By the Early Help Hub** where the family's situation has been referred to them, the best outcome is agreed to be discussion at Panel, and no other practitioner is placed to speak with the family –via conversation with the family and recorded in writing on EHM.

Family leaflets and the HEHP Privacy Notice will be available to practitioners to help explain the Panel purpose, process and use of information, in order that families may choose whether they wish to take up this particular service. Explicit consent from the family is required for the family to be discussed at Panel.

1.23 Where a family's situation is shared at an Early Help Panel, full information contained within the CFAN, Early Help Plan and TAF meetings will be shared with members of the Panel in advance of the meeting. These documents will be shared by granting access to the relevant practitioners to the family's file on EHM, or may from time to time be shared by secure email (e.g. in instance of EHM malfunction).

1.24 Should the family not agree to share with one or more specific agencies on the panel, the reasons for this should be fully explored by the Lead Professional and the family encouraged to share information fully. If the family wish to take up the service of the Panel but without sharing information with all agencies present this should be discussed with the Early Help Hub and an alternative course of action agreed to support the practitioner in their work with the family.

1.25 If however the Early Help Hub considers that the panel discussion is still viable without full sharing of information with all agencies, the family will be discussed and their request not to share information will be accommodated. This will be achieved by asking certain practitioners to leave the room during the discussion or not granting access to certain practitioners to the family's record on EHM. If the Early Help Hub considers that the panel discussion is not viable without full sharing of information with all agencies, then the family will not be discussed at panel but an alternative route to offering support will be explored together with the Lead Professional.

1.26 Agendas will be co-ordinated by the Early Help Hub and circulated in advance via secure email. These will where possible use EHM reference numbers rather than client-identifiable details. Minutes will be circulated via secure email after the meeting to all members of the Panel by the Early Help Hub and will use where possible EHM reference numbers rather than client-identifiable details.

1.27 Discussion within the meeting will be bound by a confidentiality agreement signed at

each meeting by all practitioners attending confirming that details will not be shared outside of the meeting. Meetings will be structured in such a way as to ensure the practitioners most relevant to the information shared are in the room, e.g. meetings may begin with discussion of children aged 0-5 and the agencies which support this age group.

- 1.28 Practitioners attending the Panel should not store information regarding the discussion on their own organisation's electronic or paper-based recording systems unless this is directly relevant in order for them to carry out their 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.

**Activity 4: Sharing of information regarding individual families by practitioners to/from the Early Help Hub for the purposes of advice, guidance and consultation.**

- 1.29 The Early Help Hub will offer an advisory service to practitioners within HEHP organisations to support them in finding the most effective early help approaches for families. The aim of the Hub will be to drive a high quality of early help delivery to families in the borough.
- 1.30 The Children Act 2004, section 11, places a duty on all practitioners working with children to share information to promote the wellbeing and safeguarding of children. Where practitioners have concerns about the wellbeing of children and young people within a family, they may under this provision share information regarding the family's situation with the Early Help Hub in order to secure advice, guidance and consultation regarding appropriate action. Practitioners will be expected to follow the [seven golden rules of information sharing](#) when sharing information with the Hub for consultation purposes.
- 1.31 The practitioner contacting the Hub will have ideally discussed this and the HEHP privacy notice with the family. The family may already have an open CFAN and Early Help Plan on EHM, which will have recorded agreement to receive early help services and will be accessible by the Hub. However, there may also be scenarios from time to time where the practitioner is justified in contacting the Hub 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. The practitioner may also consult with the Hub without giving client-identifiable details for the family should they wish.
- 1.32 Practitioners in the Early Help Hub will have access to the Local Authority LCS (Children's Social Care), EHM (Children's Early Help) and EMS (Education and Early Intervention) case management systems. This will be to support joint working and in order that sufficient information is available to the Hub regarding individual children and families to allow safe and accurate guidance to be given in relation to intervention approaches and level of risk. The Hub will screen a family across systems as part of a consultation. Where the Hub is aware of contextual information which must be taken into account by the consulting practitioner in order to work safely and effectively with the family, the Hub will share this proportionately under the [seven golden rules of information sharing](#). The Hub will share appropriate information provided to them during a consultation with Children's Safeguarding & Specialist Services if they have cause to believe that a child may be at risk of significant harm.
- 1.33 Where the Hub has been given client-identifiable details during a consultation, they will record the conversation on the family's record on EHM for the purposes of record-

London Borough of Hounslow's Information Sharing Agreement version 2

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keeping, audit trail, and context to support any future conversations. The practitioner contacting the Hub may also record the consultation within their own organisation according to their own internal procedures.

**Activity 5: Sharing of information by HEHP members with the Early Help Hub to support strategic and operational development of early help in the borough.**

- 1.34 The Early Help Hub will be responsible for compiling intelligence regarding early help trends and themes in the borough and coordinating multi-agency responses on behalf of the HEHP. Work will be undertaken as directed by the Early Help Strategy Group and the specific information required to be shared by members of the HEHP with LBH, or between members of the HEHP, to support individual pieces of work will be discussed and agreed on a task-by-task basis at the Group.
- 1.35 Data will likely be shared in this scenario via EHM, other Local Authority owned systems, or by secure e-mail to the Early Help Hub and LBH Children’s Performance & Data team.
- 1.36 The purpose of sharing information will be either to respond to need presenting within the borough or to inform planning and development of services for families.

**The Partner’s Data Protection Officers:**

**Name of school:**

**Name:**

**Telephone Number:**

**Email Address:**

**2. Information Sharing**

<p><b>Please state the types of information that needs to be shared.</b></p>	<p><b><u>Personal Data</u></b></p> <p>Name Age Gender Date of birth Address Contact details NHS number Unique Pupil Number</p>
	<p><b><u>Special Categories of Personal Data</u></b></p> <p>Ethnicity Religion Language spoken Communication needs Disability or special needs Named health conditions where relevant to early help support needs</p>



	<p>Named convictions where relevant to early help support needs</p> <p><b><u>Other (e.g. business sensitive data)</u></b></p> <p>Details of employment status  Educational setting where applicable  GP  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  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</p>	
<p><b>How will the information be shared/transferred?</b></p> <p><b>Please include how the information will be kept secure during the transfer.</b></p>	<p><b>Physical Transfer</b></p>	<p>Information may be shared verbally with LBH by members of HEHP organisations, for example when phoning the Early Help Hub to seek consultation, advice or guidance regarding a family's situation. This will be a 1:1 sharing situation with the Early Help Hub working to professional confidentiality standards – i.e. the information will not be shared further verbally with other agencies unless there is a safeguarding concern which warrants this. Members of the Early Help Hub will record details of the consultation on a secure case management system EHM which will be hosted by LBH and dedicated to recording early help work.</p>
	<p><b>Electronic Transfer</b>  <b>e.g. secure email (Egress)</b></p>	<p>Information may be shared by email between any HEHP member and between HEHP members and LBH. This will be done via secure email.</p>
	<p><b>Shared access to systems</b></p>	<p><b>Early help family assessment, plan and referrals:</b></p> <p>Named staff within HEHP services will be granted access to EHM, hosted by LBH, to record, store and share early help information relating to the specific families they are actively working with. This will be to support direct interventions with families.</p>

		<p>A username and password and Secure 1x Token Access (through work email) will be required to access EHM.</p> <p>LBH will use the information stored on EHM to monitor, evaluate and report on activity, performance and quality.</p> <p>See information in 1.14-1.19 above.</p>
<p><b>How often will the information be shared?</b></p>	<p>Frequency of sharing will depend on the activity, for example:</p>	<ul style="list-style-type: none"> <li>• <b>Sharing for compilation of reporting framework</b> – quarterly</li> <li>• <b>Sharing with other practitioners within the Team Around the Family</b> – may be as frequently as daily at some times</li> <li>• <b>Sharing with the Early Help Hub for consultation</b> – daily</li> <li>• <b>Sharing as part of Early Help Panels</b> – monthly to six-weekly</li> <li>• <b>Sharing to support strategic/operational development work</b> – as required on a task-by-task basis</li> </ul>
<p><b>Who will have access to the information?</b></p> <p><b>Please include how access will be managed and:</b></p> <ul style="list-style-type: none"> <li>- <b>confirmation that the Partners' staff members have completed Data Protection training.</b></li> <li>- <b>confirmation that the Partners' staff members hold a valid DBS / Disclosure Scotland (if appropriate)</b></li> </ul>	<p>Access to EHM:</p> <p>Named staff from HEHP organisations will have access. Access will be granted under the following conditions:</p>	<ul style="list-style-type: none"> <li>• Named staff have been confirmed by an appropriate senior manager within the HEHP organisation to have been DBS checked.</li> <li>• The HEHP organisation has provided evidence to LBH of valid processes and protocols within their own organisation to ensure that their staff are aware of roles and responsibilities with regard to information sharing</li> <li>• There has been evidence provided to LBH that the named staff member has completed data protection and security training appropriate to the work being undertaken</li> <li>• Access to individual family files will be granted manually by the Early Help Hub within LBH on receipt of a valid request for access.</li> <li>• Access will be withdrawn manually by the Early Help Hub when no longer required by practitioners.</li> <li>• Members of the HEHP agree to refrain from unauthorised sharing of information held on EHM outside of the parameters of this agreement.</li> <li>• Where a named staff member has no episode open in EHM for 6 months their access will be suspended.</li> </ul>

### 3. Legal Basis

#### Legal basis for sharing this information

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. Practitioners should discuss this choice, and the HEHP privacy notice, with families transparently from the outset to inform their decision as to whether to receive early help services. Leaflets will be available to support the conversation. Families should understand explicitly what information practitioners will request from them, why, and how and with whom it will be shared and stored. Agreement to receive early help services and understanding of the privacy notice will be recorded explicitly in writing within the HEHP member's own organisation and again explicitly on the CFAN within EHM or equivalent template Word documents/e-forms.

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 is 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 LBH Children's Safeguarding and Specialist Services if a child is believed to be at risk of significant harm, in order to safeguard the child.

Where a practitioner feels discussion of a family's situation at an Early Help Panel would be helpful, the family's explicit consent must be gained specifically for discussion at panel. In this instance consent is the lawful basis for sharing information.

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 HEHP to share information to promote the wellbeing and safeguarding of children.

Statutory guidance Working Together to Safeguard Children 2018, points 23-27, which applies to all members of the HEHP and recommends that:

- Effective sharing of information between practitioners (see [Information sharing advice for safeguarding practitioners](#)) and local organisations and agencies is essential for early identification of need, assessment and service provision to keep children safe.
- Practitioners should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children [including] when problems are first emerging
- All organisations and agencies should have arrangements in place that set out clearly the processes and the principles for sharing information

### 4. Storage of Information

**Please state, in detail, where the information will be stored (paper and electronic)**

In the vast majority of instances information will not be stored on paper by practitioners. 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. Where paper copies of CFANs, plans and TAF information are given to

London Borough of Hounslow's Information Sharing Agreement version 2

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<p><b>Please include whether the data will be taken off site (outside the Council's and Partner's premises). If so, what controls are in place to protect the data.</b></p>	<p>families it will become the responsibility of the family to store their information securely.</p> <p>Electronic information will be stored securely in EHM or on LBH individual user/service shared drives. Please see 1.14-1.19 above re controls in place to protect EHM data. Information stored on LBH drives will be subject to LBH security controls.</p> <p>The only instances where data might be taken off-site are:</p> <p>a) when a practitioner 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.</p> <p>b) when a practitioner prints a paper copy to take with them to a meeting with the family or with the Team Around the Family. In this case, practitioners 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.</p> <p>All users will be required to undertake EHM training delivered by LBH 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.</p>
<p><b>Please state how long the information will be kept for (pass and electronic)</b></p>	<p>Information will be stored in accordance with the LBH retention schedule:  <a href="http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf">http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf</a></p>
<p><b>Please state, in detail, how the information will be returned and/or destroyed securely (paper and electronic)</b></p>	<p>The LBH retention policy will be followed:  <a href="http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf">http://intranet.hounslow.gov.uk/chas_retention_schedule_electronic_paper_records_oct18.pdf</a>. LBH will liaise with the supplier in relation to destruction of data.</p> <p>Where data has been printed onto paper, partners will need to shred this and/or dispose of under confidential waste procedures within their own organisation.</p>
<p><b>Please state the protective marking and classification of the data [e.g. official sensitive]</b></p>	<p>Official sensitive</p>
<p><b>Please state what controls will be in place if the agreement is terminated.</b></p>	<p>If the agreement is terminated the information collated will be stored in accordance with the LBH retention schedule and then securely destroyed.</p>

## 5. Security

<b>Data management and security</b>	<b>Encryption</b>	All data should be encrypted to AES-128 standard and must be password protected using a minimum of 12 characters, a mixture of alphanumeric characters and special characters.
	<b>Formats used</b>	All data should be submitted in an approved format. The Information Commissioner's Office data sharing code recommends a template to be used for the sharing of information. Please see <u>Annex 1</u> as an example.
	<b>Security</b>	All data will be held securely in accordance with the requirements of the new Data Protection laws. Data will be loaded into the relevant secure applications (as stated in section 4) and access will be granted to only those members of staff with authorised access.
	<b>Outputs</b>	All data will be held securely in a secure location on the Council's Network and Partner's network.
	<b>Data Breaches and Risk Management</b>	The new Data Protection laws place a requirement on organisations to notify the Information Commissioner's Office of a data breach (if appropriate) within 72 hours. Any breach in security must be reported immediately to the parties: The Council - <a href="mailto:informationgovernance@hounslow.gov.uk">informationgovernance@hounslow.gov.uk</a> The Parties Data Protection Officers details can be found in section 1.
<b>Security clearance and ID pass required</b>	No	

### Terms and Conditions

The Partner hereby agrees to the following terms and conditions:

1. The Partner is fully committed to and is familiar with the new Data Protection laws (General Data Protection Regulations and Data Protection Act 2018).
2. All information will be used, processed and stored in accordance with the new Data Protection laws and any other relevant legal requirements
3. The Partner will ensure that access to the information is restricted to authorised personnel.
4. The information will be stored in accordance with section 2.
5. Following the completion of the project, the files are securely destroyed in line with section 4 and confirmed with the parties to the agreement.
6. The data is fully compliant with the methods of transfer and security noted above.
7. Information that is disclosed to the Partner must not be further disclosed to another supplier/agency without the prior written consent from the Council (whereby this Information Sharing Agreement will be amended to reflect the changes).
8. The information disclosed must only be processed in accordance with this agreement. If there are any changes to the purpose of processing, the agreement will be revisited.

London Borough of Hounslow's Information Sharing Agreement version 2

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9. Any information that has been lost, stolen, disclosed, misused or mishandled in any way must be reported to the Council's and Partner's contract manager / Data Protection officer 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).
10. The Partner will not report any matters to the data subjects, Information Commissioner's Office or any other bodies without reporting it to the Council.
11. The Partner will assist the Council in responding to any Information Rights made under the new Data Protection Laws within the statutory time frame
12. The Partner will assist the Council in responding to any Freedom of information and / or Environmental Information Regulations requests

If there are any changes to the way information is being processed and / or who will have access to the information, this agreement will be amended to reflect the changes.

This agreement will be reviewed on an annual basis.

**Declaration**

Signed on behalf of the London Borough of Hounslow

<u>Name</u>	<u>Position</u>	<u>Signature</u>	<u>Date</u>
Michael Marks	Interim Director of Children's Services		

Signed on behalf of **Name of school**

<u>Name</u>	<u>Position</u>	<u>Signature</u>	<u>Date</u>