

Community Safety  
Information Sharing Agreement

**November 2009**

## **1. Policy Statements of Community Safety Information Sharing**

- 1.1 Under the Crime & Disorder Act 1998 the Police Reform Act 2002 and the Police and Justice Act 2006. Local Authorities, the Police, Police Authorities, Fire Authorities and the Primary Care Trust have a duty to work in partnership to reduce crime, disorder, antisocial behaviour, substance misuse and behaviour adversely affecting the environment. Any agency can disclose any information to the above relevant authorities for the purpose of preventing and detecting crime and for obtaining certain Orders (e.g. Anti-Social Behaviour Orders, Sex Offender Orders etc). Information exchange takes place in the normal routine of every day work but in addition, there are a number of sub-groups of the Coventry Community Safety Partnership (CCSP) where personalised data is shared for case management purposes or for the prevention, detection and/or reduction of crime.
- 1.2 The Coventry Information Sharing Protocol (hereinafter called "the CISP") is designed to enable safe sharing of agreed information by secure processes as is necessary between agencies.

## **2. Purpose**

All exchanges will support the delivery of Coventry's Community Safety Plan 2008-11 and will be in keeping with the legal considerations within the Coventry Information Sharing Protocol. Personal information will be exchanged for the following purposes:

- To prevent and tackle crime, disorder, antisocial behaviour, substance misuse and behaviour adversely affecting the environment
- Sex Offender Orders
- Anti-Social Behaviour Orders
- Local Child Curfew Orders
- Child Safety Orders
- Mental Health Orders
- Drug Rehabilitation Requirements
- Alcohol Treatment Requirements
- Parenting Orders
- Environmental Crime i.e. Seizure of noise-making equipment/Fly Tipping and PNC checks to ascertain the identity of registered owners where appropriate for purposes including Fly Tipping and Abandon Vehicles etc
- Racially aggravated offences
- Exclusion Orders
- Supervision Orders
- Curfew Order
- Community Rehabilitation Order
- Community Punishment Order
- Community Punishment & Rehabilitation Order
- Attendance Centre Order
- Action Plan Order
- Detention and Training Orders
- Youth Intervention Project
- Family Intervention Project
- Drugs Intervention Programme
- Channel Project
- Integrated Offender Management including:
  - Local Case Management Forums
  - Multi Agency Risk Assessment Conference (MARAC)
  - Domestic Violence and Abuse Offender Forums

- Shared Priorities Forum (SPF)
- Intensive Family Intervention Programme (IFIP)
- and other Offender Management Forums operating within the city on behalf of the CCSP
- o Active Intelligence Mapping System (AIMS) activity and planning
- o Providing a holistic support package to at risk groups, e.g. sex workers, homeless individuals
- o \*MAPPA is not included and is subject to specific information sharing arrangements outside the scope of this document

### **3. Legal Basis for Data Sharing**

- 3.1 Legislation has been highlighted in Annex 1 of this document to enable requesters of information, to consider which legislation is appropriate for their written request on Annex 2 to enable the lawful basis to exchange data requested.
- 3.2 This Community Safety section has been developed to achieve the objectives as set out in Section 1. It is the intention that all aspects of information exchange and disclosure relating to this Community Safety section shall comply with legislation that protects personal data - see [Section 6](#) of the overarching CISP.
- 3.3 Exchange of information including those within the context of meetings is covered by S115 of the Crime and Disorder Act 1998 and the Police Reform Act 2002 and the Police and Justice Act 2006.
- 3.3 The agencies should also consider, not only the legislation they use to have access to information but also the Human Rights Act 2000 and the Data Protection Act 1998.

### **4. What data is it necessary to share?**

- 4.1 Where possible, and if appropriate, partner organisations will seek informed explicit consent from the individual concerned before sharing his/her personal information in accordance with this protocol.
- 4.2 Where consent is not possible or appropriate, (see [section 10](#) of the overarching CISP) the data you exchange must be deemed necessary, appropriate and proportionate to the level of risk and should be the minimum amount needed to achieve the purpose identified in Section 2. You must decide if you could do this using data that does not identify individuals (anonymised data).
- 4.3 If data, which identifies individuals, must be used you should specify as closely as possible the details and the type of data that each partner agency will disclose and to which other partner agency, ensuring at all times that it is necessary, appropriate and proportionate. For example, client name, home address and date of birth. Data may also include details of specific incidents, including date/time reported/occurred, reference numbers and Geographical Information System co-ordinates as is necessary to meet the requirements set out in Section 2. Where the partnership is aiming to prevent offending, information sharing about those at risk of offending as well as offenders maybe required and must be done so on a lawful basis.

### **5. Frequency of sharing**

Information will be shared regularly as required for the purposes specified.

### **6. How information will be shared**

- 6.1 Information can be shared verbally or in writing. Where it is shared, a written record should be made of what information is shared, with whom and for what purpose and under what legislation as soon as reasonably practicable.
- 6.2 Records must be made of any information shared and may take the form of:
- Where regular case management meetings are involved, information will be exchanged under legislation in section 1.1, the Case Management Action Logs from the meetings will outline details of the information shared and the purpose for sharing the information. The Case Management Action Logs from the meetings should be marked 'Restricted' and those receiving the information undertake not to share it with other parties unless it is necessary to do so in order for action to be progressed.
  - Where information sharing is more ad-hoc agencies should use forms dedicated for the purpose e.g. The Community Safety Form at Annex 2 or West Midlands Police Form WA170.
  - Where information cannot be recorded in these ways individuals should ensure that a record is created which records the information disclosed. Appendix 5 of the overarching CISP contains a form which may be used for this purpose.
- 6.3 Information should be shared subject to the security principles and recording principles of the overarching CISP reference [section 11](#) of the overarching CISP.

## **7. Retention**

Data shared should not be retained by any agency other than the agency controlling the data, beyond the requirements outlined in their retention and disposal policy.

## **8. Responsibility for sharing data and ensuring data is accurate**

Each partner agency should identify single points of contact (SPOC) responsible on a day-to-day basis for written formal requests. The agency providing the data should be responsible for the accuracy of any data exchanged, and ensure that it is accurate at the point of exchange. Where the information contains opinion, this should be made clear and substantiated.

## **9. Who will have access to this data?**

- 9.1 Data should only be made available to those agencies requiring it under the purposes specified. Agencies may share information in order to take action directly themselves or support others.
- 9.2 Information sharing in the context of this protocol can only be undertaken through identified single points of contacts (SPOC).
- 9.3 Single Points of Contact (SPOCs) in connection with each purpose as outlined in section 2 is provided in Annex 3. The Role/Agency, and not the name of each SPOC is indicated due to variations in staff over time.
- 9.4 Where a SPOC is not available to personally undertake these responsibilities, a designated representative should be identified.

## **10. Timescales**

Any request for information exchange should be actioned as soon as possible.

## **11. How securely does the data need to be stored?**

- 11.1 Each partner agency should ensure that the minimum standards of technical and non-technical security, that they require, are agreed with partner agencies with whom their data will be exchanged. They should be compliant with the overarching CISP [Section 11.1.3](#). This should take account of the security classification of the data.
- 11.2 Each partner agency signing this protocol will agree to adhere to the agreed standards of security. If there is a security breach in which data received from another party under this agreement is compromised, the originator will be notified at the earliest opportunity, via the SPOC identified in Annex 3 who must forward details to the agencies' Information Security Section.
- 11.3 If you do not have a security classification scheme which includes handling rules, the following points should be considered to assist you - add and delete them as necessary:
- Ensure that unauthorised staff and other individuals are prevented from gaining access to personal and confidential data.
  - Ensure visitors are received and supervised at all times in areas where personal or confidential data is stored. All information should be kept electronically where possible and stored securely on access controlled systems under password protected files. The level of security will depend on the type of data held, but only those who have a legitimate need to use the data, will receive it. Paper copies should be sent/received via secure fax and kept securely in a locked cabinet.
  - Do not leave your workstation/PC signed on when you are not using it, or lock the keyboard if you are away for a short period of time or go out of sight of your PC.
  - Also lock away disks, tapes or printouts when not in use. Disks that contain personal or confidential data should be encrypted.
  - In most cases, the information exchanged will be an exemption under the Data Protection Act 1998. If it is decided that permission needs to be obtained from the data subject, great care must be taken about the safety of individuals and employees from the Agencies undertaking this, which may include a risk assessment.

## **12. Further Use of Data**

Partner agencies should consider-

If the information that is to be used for a different purpose in the future, they need to go back to the originating agency (the agency controlling the data) to ask permission for future use and sharing must be consistent with the [purposes stated in the overarching CISP](#).

## **13. Breach of Confidentiality**

- 13.1 In the event of a breach of confidentiality, staff should contact their organisation's Information Governance team for advice and guidance.
- 13.3 Where appropriate, each agency will take disciplinary action and/or instigate criminal proceedings in line with their relevant policies. For more information see [Section 15](#) of the overarching CISP.

## **14. Organisational and individual responsibilities**

- 14.1 The partner agencies responsible for the breach will keep each of the other partner agencies fully indemnified against any and all costs, expenses and claims arising out of any breach of

this agreement and in particular, but without limitation, the unauthorised or unlawful access, loss, theft, use, destruction or disclosure by the offending partner agency or its sub-contractors, employees, agents or any other person within the control of the offending partner agency of any data obtained in connection with this agreement. For more information see [Section 17](#) of the overarching CISP.

## **15. Review of Community Safety section**

The Protocol will be reviewed and subjected to a risk based audit. This section defines how and when the Community Safety section will be reviewed and audited. It is recommended that each section of the protocol is reviewed one year after signature and at an agreed period thereafter. This review is the responsibility of the Assistant Community Safety Manager within the Community Safety Team who will regularly review this in conjunction with the representatives from Partnership agencies, but will also be linked with the overall review of the CISP. Guidance on how to carry out the review is attached as Annex 4.

## **16. Closure/Termination of Agreement**

- 16.1 Any partner agency can suspend this information sharing agreement if security has been seriously breached. This should be in writing and be evidenced. The agreement will be suspended until the agency in question can demonstrate that they rectified any issues.
- 16.2 Any suspension will be subject to a Risk Assessment and Resolution meeting, the panel of which will be made up of the signatories of this agreement, or their nominated representative. This meeting to take place within 14 days of any suspension.
- 16.3 Termination of this agreement should be in writing to all other partner agencies giving at least 30 days notice.

## **17. Requests for Disclosure of Information received under Community Safety**

- 17.1 Recorded information held by public sector agencies is subject to the provisions of the Freedom of Information Act 2000 and the Data Protection Act 1998.
- 17.2 It is possible that a client may seek a copy of their records under Data Protection Act 1998. If an agency receives a request for access to these records they should approach their own Information Governance Team or the Council's Information Governance Team for guidance, as it may be possible to narrow down the information needed to assist their access to the relevant record and refer the request to the originator and custodian of the document.
- 17.3 Whilst there is no requirement to consult with third parties under Freedom of Information Act 2000, the parties to this protocol will consult the party from whom the information originated and will consider their views to inform the decision making process.

## **18. Appropriate Signatories – Data Request Form**

- 18.1 For the sharing of information within sub-groups of the Community Safety Partnership each partner agency has identified who is the most appropriate post holder within their agency to sign the Data Request Form (Annex 2) having taken account of their organisational policy and the fact that the signatory must have delegated responsibility to commit their agency to the indemnity. It is the responsibility of the individuals identified at Annex 3 to ensure that copies are made available as necessary to ensure adherence to the Data Request Form and overarching protocol.

18.2 I confirm that this Data Request Form has been prepared in consultation with the Partnership agencies for each signatory.

## Legal Basis for Data Exchange

Legislation	Relevant Section
Agriculture (Miscellaneous Provisions) Act 1968	s.6
Agriculture Act 1970	s.76
Animal Health Act 1981	s.36 & 63
Animal Welfare Act 2006	s.18, 19, 23, 28 & 29
Anti Social Behaviour Act 2003	Part VI, 40 - 54
Building Act 1984	Various
Children and Young Persons Act 2008	
Children Leaving Care Act 2002	
Clean Neighbourhood & Environment Act 2005	Various sections
Consumer Credit Act 1974 (amended 2006)	s.162
Consumer Protection Act 1987	s.29
Copyright Designs and Patents Act 1988	s.107A refers to powers under TDA 1968
Courts and Legal Services Act 1990	s.107
Coventry Information Sharing Protocol	
Crime & Disorder Act 1998	Section 115
Criminal Justice & Immigration Act 2008	
Diocese of Coventry Child Protection Guidelines	
Education Reform Act 1988	s.215
Energy Conservation Act 1981	s.20
Enterprise Act 2002	s.225 notice only Section 238
Environmental Protection Act 1990	s.33, 34, 69 & 88, 45, 46, 47. PNC checks where appropriate.
Estate Agents Act 1979 s.11	s.27 (obstruction)
European Communities Act 1972 including Regulations made under the Act relating to metrological and food legislation (powers contained in regulations). including from 26/05/2008 :- <ul style="list-style-type: none"> <li>• Consumer Protection from Unfair Trading Regulations 2008, and,</li> <li>• Business Protection from Misleading Marketing Regulations 2008</li> </ul>	s.21 s.21
Fair Trading Act 1973	s.29
Food and Environment Protection Act 1985	s.4
Food Safety Act 1990	s.32
Freedom of Information Act 2000	
Hallmarking Act 1973	s.9 refers to powers under TDA 1968
Health and Safety at Work Act 1974	s.20
Highways Act 1980	Section 132
Human Rights Act 2000	
Licensing Act 2003	
Local Government and Miscellaneous Provisions Act 1976	13, 14, 15, 16
Medicines Act 1968	s.111
Mental Health Act 2007	

<b>Legislation</b>	<b>Relevant Section</b>
Motor Cycle Noise Act 1987	Schedule refers to CPA87
Motor Vehicles (Safety Equipment for Children) Act 1991	
Poisons Act 1972	s.9
Police and Justice Act 2006	
Police Reform Act 2002	
	Part II, Building Regs. 4-11, Sewers, drains and sanitary conveniences 12-14, 15, 16,17, 19-21, 22, 23-33, Accumulations of rubbish 34, Filthy or verminous premises or articles, 35, 36, 37
Public Health Acts 1936, 1961 and Amendment Act 1980	
Public Health (Control of Disease Act) 1984	Part III, 46,47,48
Prevention of Damage by Pests Act 1949	Part 1, 1 to 12
Prices Acts 1974 & 1975	schedule, paragraph 9
Property Misdescriptions Act 1991	schedule, paragraph 3
Refuse Disposal (Amenity) Act 1978	
Regulation of Investigatory Powers Act 2000	section 22(2)(b)
Road Traffic (Foreign Vehicles) Act 1972	s.1
Road Traffic Acts 1988 (and 1991)	s.70
Safeguarding Adults, ADSS 2005	
Serious Crime Act	s.72
Telecommunications Act 1984	
The Children Act 1989 and 2004	
Timeshare Act 1992	schedule, paragraph 3
Tobacco Advertising and Promotion Act 2002	s.14
	(regulations made under sections 220 and 224 relating to fly posting, section 221 and, section 225 of the Act, only)
Town and Country Planning Act 1990	
Trade Descriptions Act 1968	s.28
Trade Marks Act 1994	s.93 refers to TDA s.28
Video Recordings Act 1984 (and 1993)	s.16A
Weights and Measures Acts 1976 and 1985 and metrological legislation under the European Communities Act 1972	s.20, 38, 39, 40, 41 & 79 and schedules
Working Together to Safeguard Children	

In November 2009 the new Youth Rehabilitation Order should come into place, which will replace a number of the orders within the Purpose Section 2 and Annex 3.

# Annex 2 Data Request Form

[Named Officer]

[Named Agency]

## **Data Protection Act 1998 Section 29 and Crime and Disorder Act 1998 Section 115 - Disclosure of Relevant Information**

In line with the Community Safety Partnership's Community Safety Plan and the commitment to do all that is reasonable for the purposes of reducing and detecting crime, disorder and anti-social behaviour, [agency] is seeking information as outlined below for the purposes of managing offending, but may possibly be needed for other enquiries and/or proceedings relating to anti-social behaviour with the aim of preventing such activity on housing estates.

In order to maintain the confidentiality of [agency] you are requested not to inform the data subject(s) of this request.

Name	Current Address	Date of Birth

I would be grateful if you would supply me with the following information on behalf of [agency]:

Please note:

1 Section 29 of the Data Protection Act and Section 115 of the Crime and Disorder Act do not compel the disclosure of information. However, they do recognise that in some circumstances the public interest requires the disclosure of personal information, creating non-disclosure exemptions. These exemptions include:

- disclosures required by law or in connection with legal proceedings;
- disclosures required for the prevention or detection of crime;
- disclosures required to protect the vital interests of the individual concerned; and
- where there is an overriding public interest.

2 for these purposes activities are relevant if they:

- i) took place in the ..... area and caused or were likely to have caused harassment, alarm or distress to any other person;
- &/or ii) resulted in damage to property;
- &/or iii) are classified as an arrestable offence;
- &/or iv) involved unlawful use of the household address.

3 relevant information is sought from [date]

4 the information is requested by [date]

The information detailed in column A is now required. The information detailed in column B is not being sought at this stage but may be required to be produced should the action (s) intended proceed to court. Accordingly you are requested to authorise that such additional information is disclosed to [agency] on further application to the police sector team.

**Please tick A and/or B**

A	B	Information required
		The following specific information is sought following liaison with [officer(s) details] of the police sector team.  It is intended that this information is used as the grounds for [action intended – e.g. NSP, Injunction] and that it will be quoted in formal proceedings and documents.
		Details of any relevant activities witnessed by police officers, the names of the officers and, if available, any relevant statements by those officers.
		The names and addresses of any other persons known to have witnessed any relevant activity and, if available, statements made by those other persons.
		Details of any other criminal activity by the data subject(s) that involved relevant activities and that are not spent under the Rehabilitation of Offenders Act.
		A summary of all police visits to the household address concerning relevant activities.

[Agency] undertakes:

- 1 To use the information sought only for the purpose of:
  - a) ascertaining if there is sufficient cause to institute civil proceedings against the data subject(s) because of relevant activities;
  - b) pursuing such proceedings
- 2 To ensure that access to the information will be strictly limited to those officers of [agency] who reasonably need to see it for the purposes stated and any person subject to the relevant proceedings.

Signed \_\_\_\_\_

Date \_\_\_\_\_

[agency and position of signatory]

## Annex 3

# Purpose and Single Point Of Contact (SPOC)

Key SPOCs are listed for each purpose however it is acknowledged that a wider number of officers are involved in this work, who may also be party to data exchanges where appropriate and within legal guidelines.

<b>Purpose</b>	<b>SPOC</b>
Sex Offender Orders	<ul style="list-style-type: none"> <li>• (WMP) Public Protection Unit Manager</li> <li>• National Probation Service (NPS) Offender Manager,</li> <li>• Senior Probation Officer,</li> <li>• District Manager</li> </ul>
Anti-Social Behaviour Orders	<ul style="list-style-type: none"> <li>• Registered Social Landlords (RSLs), WMP and the Local Authority have the power to implement ASBOs, therefore professionals involved will depend on requirements/needs.</li> </ul>
Local Child Curfew Orders	<ul style="list-style-type: none"> <li>• WMP,</li> <li>• CCC including Children Learning and Young People (CLYPS)</li> </ul>
Child Safety Orders	<ul style="list-style-type: none"> <li>• WMP,</li> <li>• CCC including Children Learning and Young People (CLYPS)</li> </ul>
Mental Health Orders	<ul style="list-style-type: none"> <li>• Coventry &amp; Warwickshire Partnership Trust (C&amp;WPT)</li> </ul>
Drug Rehabilitation Requirements	<ul style="list-style-type: none"> <li>• Coventry &amp; Warwickshire Partnership Trust (C&amp;WPT)</li> <li>• Community Drug Team (CDT) Substance Misuse Lead and DIP Manager</li> <li>• (NPS) Offender Supervisor,</li> <li>• Offender Manger,</li> <li>• Senior Probation Officer,</li> <li>• District Manager.</li> </ul>
Alcohol Treatment Requirements	<ul style="list-style-type: none"> <li>• Swanswell Charitable Trust,</li> <li>• National Probation Service</li> </ul>
Parenting Orders	<ul style="list-style-type: none"> <li>• Coventry City Council,</li> <li>• Registered Social Landlords</li> </ul>
Environmental Crime	<ul style="list-style-type: none"> <li>• Coventry City Council (CCC) Senior Environment Officer, Environment Officers and Principle Environmental Health Officer</li> </ul>
Racially aggravated offences	<ul style="list-style-type: none"> <li>• WMP,</li> <li>• CCC Hate Crime Reduction Officer and/or Hate Crime Reduction Officer</li> </ul>
Action Plan Orders	<ul style="list-style-type: none"> <li>• Youth Offending Service (YOS) Case Manager plus other professionals dependant on requirement/need</li> </ul>

Supervision Orders	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Attendance Centre Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Community Punishment & Rehabilitation Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Community Punishment Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Community Rehabilitation Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Curfew Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Exclusion Order	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Detention and Training Orders	<ul style="list-style-type: none"> <li>• WMP Operational Command Unit (OCU) Offender Managers</li> </ul>
Youth Inclusion Project (YIP)	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Family Intervention Project	<ul style="list-style-type: none"> <li>• YOS Case Manager plus other professionals dependant on requirement/need</li> </ul>
Drugs Intervention Programme	<ul style="list-style-type: none"> <li>• (C&amp;WPT) (CDT) Substance Misuse Lead and DIP Manager</li> </ul>
Channel Project Requirements	<ul style="list-style-type: none"> <li>• WMP Coventry Channel Project Co-ordinator and Channel Multi-agency Panel members dependent upon requirement/need. Panel Members are specific named staff from Senior Probation Officer, YOS Operations Manager, CCC Hate Crime Reduction Officer, CCC CLYP directorate.</li> </ul>
Integrated Offender Management including: <ul style="list-style-type: none"> <li>• Local Case Management forums</li> <li>• MARAC</li> <li>• Shared Priorities Forum</li> <li>• Domestic Violence and Abuse Offender Forum</li> <li>• Intensive Family Intervention Programme (IFIP)</li> <li>• Other Offender Management Forums</li> </ul>	<ul style="list-style-type: none"> <li>• (WMP) Public Protection Unit Manager,</li> <li>• (C&amp;WPT) (CDT) Substance Misuse Lead &amp; Counselling Manager</li> <li>• (C&amp;WPT) DIP Manager</li> <li>• (NPS) Offender Supervisor,</li> <li>• Offender Manager,</li> <li>• Senior Probation Officer,</li> <li>• District Manager</li> <li>• (CCC) Community Safety Officers</li> </ul>
Active Intelligence Mapping System (AIMS) Activity and Planning	AIMS is an Operational Group of the CCSP administered by West Midlands Police with partnership representation. WMP Partnership Liaison Officer.

# Annex 4

## Process for Review of Community Safety Information Sharing Agreement

The aim of a review is to ensure that the Community Safety section is achieving its purpose and that the actual process of exchanging data is operating efficiently.

### **1 Policy Statements and Purpose of this Community Safety section**

Is the policy statement and the purpose as identified in section 1 still accurate in relation to the present use of the data?

### **2 Legal Basis for Data Exchange**

Do the legal bases in the Community Safety section cover all the parties?

### **3 What data is it necessary to exchange?**

Is the data which is exchanged by the parties in accordance with this section?

### **4 Who is going to be responsible for exchanging this data and ensuring data is accurate?**

Is the contact list up to date and accurate?

### **5 How will you keep a record of what information has been exchanged?**

How are the parties keeping a record of what information has been exchanged? Random samples of the data exchanged could be checked against the source record to see if there is evidence of the data exchange

### **6 How is this information going to be exchanged?**

Is data still being exchanged in accordance with this document?

### **7 Who will have access to this data and what may they use it for?**

What use of the data is made by the parties receiving data and is access restricted in accordance with this document?

### **8 Timescales**

Are any timescales in the document being adhered to?

### **9 How securely does the data need to be stored?**

Are all the parties applying the security measures in accordance with this document?

### **10 How long are you going to keep the data?**

Are all the parties retaining and destroying the data in accordance with the document?

**11 Further Use of Data**

Is there any evidence that data is being used by any party for purposes other than in accordance with this document without consent from the originator?

**12 Breach of Confidentiality**

Have there been any breaches of confidentiality which have not been reported to the other parties? How have any breaches been dealt with?

**13 Indemnity/Confidentiality Agreements**

Is there evidence that any individual who is not covered by an agency which is a signatory to this document has signed a confidentiality agreement and are these held on behalf of the Chair?

**14 Freedom of Information Act 2000 (FOIA)**

Is this Protocol publicly available and also available internally for relevant staff?

**15 Requests for Disclosure of Information received under this Protocol**

Have there been any instances where a party has disclosed information received under this document without consulting the originating party?

**16 Appropriate Signatories**

Is the Protocol signed by appropriate person in each agency, or should the document be signed by a someone else?

Review was carried out by:

Name .....

Signature .....

Agency .....

Date .....

Name .....

Signature .....

Agency .....

Date .....

**A copy of this review should be stored with the Protocol, any deficiencies should be brought to the attention of the Signatories as appropriate, in addition to the relevant Partnership agencies.**

## **Data Sharing Protocol Review Group**

Simon Brake, Community Services

Iain Harrison, Customer & Workforce Services

Sara Roach, Community Safety Manager

Mandie Watson, Assistant Community Safety Manager

Inspector Jo Floyd, Partnership Liaison Officer (WMP)

Mike Donnison, Coventry Teaching Primary Care Trust

Andrea Simmons, West Midlands Fire Service