

Information Sharing Protocol.

1. Introduction.

The Isle of Man Safeguarding Board has a duty to support information sharing between and within organisations for safeguarding purposes. This protocol and the associated Information Guidance, aims to ensure a culture of effective information sharing to inform decision making in safeguarding children, young people and vulnerable adults.

This Information Sharing Guidance and Protocol were devised having gathered the views from front line practitioners and managers who were working with children and adults.

The Safeguarding Act (2018) sets out the duty of agencies to co-operate and share information that is expedient to the safeguarding of adults and children. Safeguarding Together (2019) sets out the important role of the Board in supporting information sharing and ensuring that “information sharing is developed and supported”. In meeting this statutory role of the Board, the Information Sharing Guidance and Protocol provide a framework for the secure and confidential sharing of information between organisations.

2. Purpose.

Effective information sharing is cited in many Serious Case Management Reviews, Children’s Serious Case Reviews, Safeguarding Practice Reviews and Safeguarding Adult Reviews, as a key barrier to effective decision making to safeguard children, young people and vulnerable adults. When inter-agency information sharing works, it can aid the timely provision of early help services as well as provide the evidence for supportive services and interventions to keep children, young and vulnerable adults safe.

The purpose of Information Sharing Guidance and Protocol is to set out which agencies have signed up to the agreed commitments underpinning effective information sharing on the Isle of Man and sets out the framework to:

- Ensure there is a consistent and effective response to safeguarding concerns and allegations or disclosures of abuse or neglect.
- To ensure agencies work efficiently together to conduct safeguarding enquiries.
- To support the improvement of practice through learning, such as Serious Case Management Reviews.

This aim of the Information Sharing Guidance and Protocol is also to support the three important aspects of multi-agency safeguarding working, which are

2.1. Understanding the problem – understanding the issues associated with abuse and neglect requires information to be brought together from a range of agencies. This involves exploring patterns relating to the problem, and then deciding on tactical, investigative or strategic responses to support those adults at risk of harm from abuse or neglect.

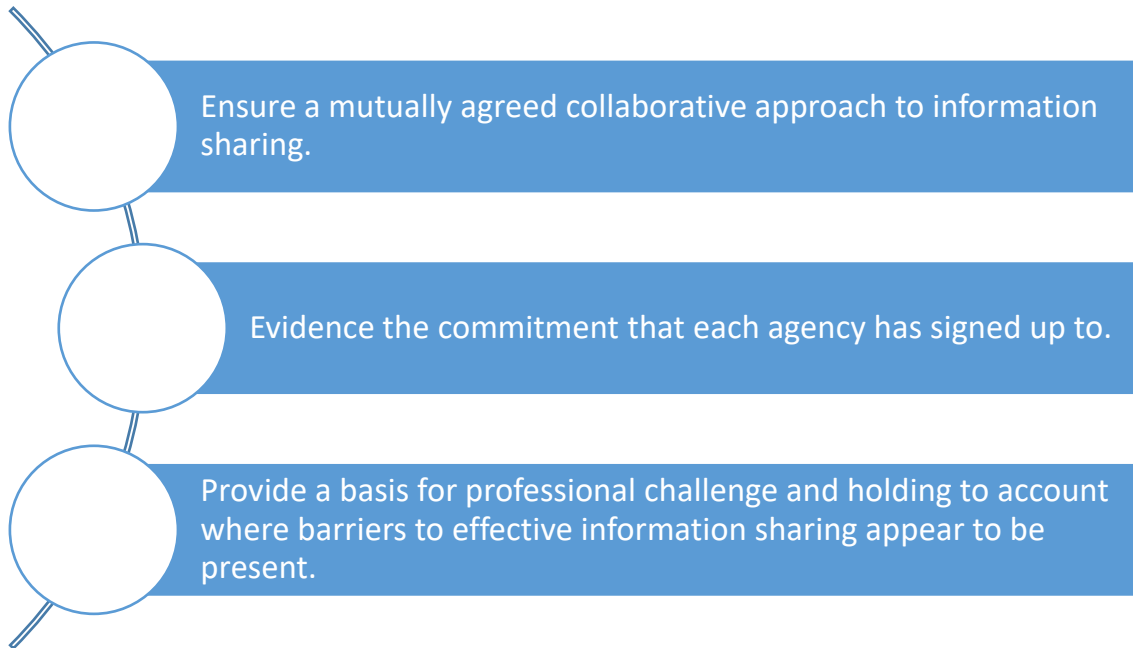
2.2 Working in a multi-agency way - we will work in a way which is multi-agency in content and multi-agency in outlook. To ensure that we are considering the issue using

information from a range of agencies, rather than just one agency, which leads more naturally to a multi-agency response and joined-up approach to addressing the issue.

2.3. Support partnership working – information sharing helps to foster and improve inter-agency relationships and leads to a more co-ordinated response.

3. Aims of this Protocol.

The multi-agency Protocol aims to:



4. What does it mean to have signed up to the protocol?

Organisations and agencies that have signed up to the protocol have agreed to the following:

- In all situations the welfare and safety of the child or vulnerable adult are paramount. The decision to disclose information in an emergency or life-threatening situation will always be supported.
- General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but provide a framework to ensure that personal information about living individuals is shared appropriately.
- Agencies will support their staff to be open and honest with individuals from the outset about why, what, how and with whom the information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- Agencies will ensure that where possible, professionals will seek consent to share information, unless there is reason to believe that in doing so, a child or vulnerable adult will be placed at risk.
- Staff will be supported in their actions where it is not possible to seek or gain consent - for example where sharing information may place someone at risk, where consent cannot be gained in a timely manner or where the person concerned does not have the

mental capacity to give consent – decisions about information sharing will be based on the welfare and safety of others.

- If professionals are not clear about whether information should or should not be shared, advice should be sought from the appropriate information sharing lead so that this decision making is supported within organisations by managers, Data Protection Officers, Senior Information Risk Lead or the Caldicott Guardian.
- Where decisions are made to either refuse to disclose information or to share information, a clear record will be made setting out how this decision has been made, by whom and what advice has been sought from key information governance roles (as set out above).
- Where agreement cannot be established on an intra-agency or inter-agency basis about whether or not information should be shared, this dispute will be resolved within 1 working day, with the assistance of the Caldicott Guardian¹ or Information sharing leads.
- Each organisation that has signed up to this protocol has agreed to have a whistleblowing procedure in place and ensure that staff are aware of how to raise concerns, without reprisal.
- Each organisation has agreed to share information into the Serious Case Management Review process.

Organisations that have signed up to this protocol include:

Isle of Man Constabulary
Department of Education, Sports and Culture,
Department of Home Affairs
Department of Health and Social Care
Manx Care

The parties listed above have signed the Declaration of Acceptance and Participation. It has been signed by Chief Executives or the equivalent functional heads of each organisation.

Signed by:
The Chief Constable, Gary Roberts
CEO DESC, Graham Kinrade
CEO DHA, Dan Davies
CEO DHSC, Karen Malone
CEO Manx Care, Teresa Cope

[signatures redacted for web purposes]

¹ Children Services and Adult Services have a Caldicott Guardian, other agencies will need to include their Senior Information Sharing leads where required.