**INFORMATION SHARING AGREEMENT**

**Links for Life Partner Data Sharing Agreement**

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| **SCOPE** | To ensure that residents have information about, and access to, appropriate community level support services that meets their needs and supports the effective allocation of resources and co-ordination of service delivery by the key partners of Links for Life Sunderland. |
| **NAME OF LEAD (s)** | Sunderland City Council |
| **ORGANISATIONS TO WHICH THE AGREEMENT APPLIES TO** | All signatories at Appendix A or signed up via [www.linkforlifesunderland.co.uk](http://www.linkforlifesunderland.co.uk) |
| **RELATED DOCUMENTS** |  |
| **AGREEMENT EFFECTIVE FROM** | Date from which the agreement is effective from 22.4.24 |
| **MONITORING & REVIEW PROCESS** | Every yearReviewed by Senior representatives from organisations via the Links for Life Operational Delivery Group |
| **VERSION NUMBER** | 0.2 |
| **Local Reference number** |  |

**Links for Life partner data sharing agreement**

# OVERVIEW

Links for Life Sunderland is the agreed citywide approach to Social Prescribing for Sunderland.  The model is centred on some guiding principles:

* Organisations working together to ensure best outcome for the ‘resident’
* Whole system approach within an end to end model
* Place-based interventions
* Working with, and from within communities
* Valuing lived experience and co-production
* Partnership working to grow the market
* Services integrated into community life
* VCS Capacity Building – Sunderland Voluntary Sector Alliance
* Evaluation to inform change
* Empowering residents and communities

The vision for Links for Life Sunderland is:

 **Links for Life Sunderland will bring together people within communities, supporting everyone to have healthy, happy lives, with no one left behind.**

The vision focusses on actively working to open up the referral end of the Social Prescribing model to enable both those that do attend GP Practices and those who do not access support in a way that meets their needs i.e. through SGPA link workers, alternative professionals working in the system or even via self-referral.  Links for Life aims to help people identify community-based solutions, with a view to preventing or reducing the need to access a more formal service, or work alongside these services to find creative ways to improve health and wellbeing. Key to this is understanding where our services are and where there are gaps in the system.

## WHAT INFORMATION IS TO BE SHARED?

Personal Information

Personal information (i.e. name/ contact details) will be collected by partner organisations for the purposes of delivering their service or project.

Personal information will be shared to facilitate referrals to support services with individuals’ consent. This can be done in several ways:

* Referral through the Theseus platform attached to the Links for Life digital platform.
* Sharing contact information via email or telephone if services indicate preferred method of contact.
* Signposting to individual organisations referral pathways (i.e. GPA Social Prescribing self-referral form held on their website)

For the purposes of referring an individual the following would be shared, depending on the nature of the referral and the target organisation concerned

* Name
* Address (including telephone and email where applicable)
* Involved professionals
* High level summary of additional needs
* DoB
* Age
* Gender
* Feedback on interaction levels with service providers.

If referrals are made on behalf of an individual (i.e. via a link worker / case worker) the referrers name, contact details will be shared with the service provider.

The following privacy information is shared at point of referral.

[Sunderland Links for Life (theseus.uk)](https://sunderland.theseus.uk/selfrefer)

Organisational Information

For the purposes of advertising and promoting the service offer the following information may be shared –

* Organisation name
* Outline of service/s offered
* Contact details.

It will be the decision of each organisation whether the details shared on the public platform are organisational level or appointed individuals contact details.

Within the members area (not publicly available but viable to member organisations of Links for Life Sunderland) the following information may be shared -

* Contact details and associated with role within member organisation.
* Organisational details (service/s offered, contact details).

Performance Management & Evaluation

For the purpose of performance management, evaluation and shared information it is anticipated that this would be amalgamated data sets, not assigned to individuals. Examples may include amalgamated demographical information including postcode level data. Individual level data will not be shared for these purposes.

For the purposes of evaluation, promotion and impact demonstration individual case studies / interviews etc may be sourced and shared with the partners. Wherever possible these will be anonymous, but where personal identifiers are required, source organisation will be responsible for ensuring explicit individual consent has been acquired for these situations.

## SOURCE(S) OF THE INFORMATION

Information about the resident will be provided by themselves, or a third party on their behalf, with their consent.

Information provided via the Links for Life digital platform will be held in the Theseus platform managed by Cyber Media Solutions and accessed by the Links for Life Coordination team hosted by Sunderland City Council.

Other partners may use different systems for managing case loads and performance management

Commissioned and funded services will provide agreed monitoring and evaluation processes via agreed method with funding organisation i.e. excel returns / data workbooks / Case studies

## PURPOSES FOR SHARING INFORMATION

Links for Life Sunderland aims to improve peoples’ experiences of navigating health and care services and their health outcomes, supporting people to live longer with a better quality of life. Working together as an alliance means that all partners are equal in standing and focussed on working across organisations to do what is best for the person and for the whole health and care system.

Information will be shared operationally –

 - where Customer enquiries and referrals are routed to the relevant Links for Life Partner/s, and

 - where a case may require Partners to work together for and with the Customer.

Information may be shared strategically –

 - for research and statistical purposes to help partners to better understand impact, reach and gaps in service for our local residents.

Information may also be shared for promotional and public relations purposes, and

Information may need to be shared if and when there is a legal obligation to do so. This is expected to be rare, but may become necessary where, for example, statutory safeguarding issues and / or criminality is identified.

## LEGAL BASIS FOR INFORMATION SHARING

For the purposes of the Data Protection Act 2018, all partners are considered to be joint data controllers (see 3.1.1), and each must have lawful bases for processing information for the purposes above.

Operational sharing is authorised under -

* Articles 6(1)(a) and 9(2)(a) (consent) for the collection and routing of Customer enquiries and referrals to Partners, and the provision of services / support *by* Partners, and
* Article 9(2)(h) for Partners’ processing of Special Category personal data in undertaking their work with the Customer

Strategic sharing will - wherever possible - be based on anonymised data. If and where research and statistical activities require the use of personally identifiable data, this will be kept to the minimum required for the work in question, and may be authorised under –

* Articles 6(1)(e) and 9(2)(j), research and statistical purposes, in conjunction with suitable privacy safeguards as required by Article 89.

Sharing for promotional and public relations may be authorised under –

* Articles 6(1)(a) and 9(2)(a) (consent). And –

Sharing necessary to meet a legal obligation may be authorised under –

* Articles 6(1)(c) and 9(2)(g) – sharing required by law for reasons of the public interest.

# SERVICE USER CONSIDERATIONS

## DATA PRIVACY IMPACT ASSESSMENT (DPIA)

A DPIA has been completed by the lead for this arrangement, Sunderland City Council and will be reviewed/updated as is required by the lead organisations Policies and procedures. The outcome of the DPIA demonstrates that there are currently no outstanding high risks to the rights and freedoms of Data Subjects.

## RIGHT OF ACCESS TO INFORMATION

Operational access to the information required under this agreement is limited to dedicated staff within the partner organisations

All partner organisations have in place appropriate contractual provisions, policy and procedures, adherence to national standards and guidance in ensuring that staff are fully aware of confidentiality and their responsibility and obligations in respect of this information.

As data subjects, Links for Life Customers will at all times retain their statutory rights under Articles 12 to 23 of GDPR. Partner organisations must each ensure their processes can accommodate the exercising of these rights.

# INFORMATION SHARING PROCEDURES & PROCESSES

## METHODS OF REQUESTING &FREQUENCY OF TRANSFER

3.1.1 Joint Data Controller Statement

Links for Life Partners will be Joint Data Controllers with respect to Customer personal data held and processed within the Links for Life (Theseus) platform.

Customer data from the Links for Life (Theseus) platform may be used to create, update or otherwise modify a Partner organisation’s own records. Partner organisations will be sole Data Controllers for their own records, and so will become sole Data Controllers for any Customer data obtained from the Theseus platform.

3.1.2 Operational Sharing

Operation data sharing covers 2 transfer routes –

A) Links for Life platform (Theseus) – to – Partner organisation

Customer information in the form of referrals is collected when the customer (or, with their permission, a representative or referrer) completes and submits a secure referral web-form.  The completed referral is then securely routed to the referrals portal and the relevant partner organisation is notified via email. The partner organisations authorised users would then login to the referrals portal where the referral details can be reviewed and actioned. No personal sensitive data is shared by email.

B) Partner-to-Partner organisation

As Partner organisations become sole Data Controllers for any Customer records they might create from Links for Life data, any Partner – to – Partner sharing (for example, for joint working with a customer, or where a Customer is referred from one Partner to another) any ‘onward sharing’ will be carried out in accordance with the relevant Partners’ own processes, procedures and protections.

3.1.3 Strategic Sharing

Any L4L member (Council or Partner organisation) can identify a Research / Statistics need that will require Links for Life platform and/or other Partner data to resolve.

When such a need is identified, the originating Partner/s will submit their requirements to the Links for Life Co-ordination Team, which will refer it to the Operations Group for consideration and progression.

3.1.4 Promotion and Public Relations

Any L4L member (Council or Partner org) can identify a promotion / need that will require Links for Life platform and/or other Partner data to resolve.

When such a need is identified, the originating Partner/s will submit their requirements to the Links for Life Co-ordination Team, which will refer it to the Operations Group for consideration and progression.

3.1.5 Safeguarding referrals & other statutory disclosure obligations

All Links for Life Partners will continue to observe established Safeguarding referral process and procedures if and when the need arises.

Any Partner that receives, or is otherwise subject to, statutory disclosure obligations will continue to observe their established response / disclosure processes and procedures if and when the need arises.

Shared information will be extracted from the source systems, and converted into Microsoft Excel or an agreed format common to the partner organisations. Partner organisations will be responsible for gather the appropriate information from all partner agencies to this agreement.

The data channel between partners provides a strong level of protection with Transport Layer Security providing symmetric cryptography to encrypt the data. However, this encryption is only in place when the data is in transit; it does not secure the email, or any attachments unless there are additional measures in place, if it goes to an incorrect email address, or the recipient’s inbox doesn’t have encryption or similar measures.

The information will be sent between the party organisations by password protected e-mail sent to an identified person.

The data will be shared as required to meet the needs of the Operational Delivery Group.

## STORAGE REQUIREMENTS

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All partners have signed the Links for Life Charter and agree to have in place robust Information Governance Policies and Procedures (such as GDPR, confidentiality and information security} that are appropriate for their organisation/group/activity and comply with all current legislation.

## ACCURACY OF INFORMATION BEING SHARED

Each partner organisation has their own mechanisms in place in respect to ensuring that all staff receive appropriate training in record keeping standards and responding to inaccurate information. Appropriate data quality audits are carried out periodically.

## RETENTION AND DISPOSAL

Information processed in line with this arrangement should only be kept by partner organisations where there is a clear purpose to do so. This purpose is outlined above. The partner organisations to this agreement will ensure that the appropriate security measures are in place where information is retained to ensure integrity, confidentiality and availability.

## INDIVIDUALS RIGHTS

Information which is used within this review is a duplicate of information which is held within the respective health record systems used by the partner organisations to this agreement. Individual’s rights in line with Data Protection act 2018/General Data Protection Regulation 2016 are exercised in line with each respective organisation’s policies and procedures and information is provided via the Organisation’s Fair Processing/Privacy Notice.

## DATA BREACHES

Data Breaches are to be reported to the Links for Life Coordination Team by the Organisation discovering the breach at the earliest opportunity. All Partner organisations are aware of their responsibility in considering whether the information breach is a high-risk breach and whether the Information Commissioner’s Office (ICO) is to be informed of the breach. Further guidance can be found via the ICO’s guidance to Data Breaches

Party organisations have policy in place in respect of data breach / incident management process in line with their GDPR requirements, which will govern the handling of such incidents. Partner organisations agree to collaborate or support other party organisation in respect of incident management as required / appropriate.

**Appendix A - List of Key Contacts**

**Information Sharing Agreement Links for Life Sunderland**

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| **Organisation Title: Sunderland City Council**Lead Reviewer: Email: Data Protection Officer: Owen Thomas – Deputy DPO Email: owen.thomas@sunderland.gov.uk |
|  |
| Organisation Title: Lead Reviewer(s): Data Protection Officer: Email:  |
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**Appendix B – Signatories**

*Links for Life Sunderland Project - Information Sharing Agreement*

*By becoming a signatory to this agreement, Partner organisations are committing to:*

*Apply the standards that are prescribed in guidance and Codes of Practice issued by the Information Commissioner’s Office and. https://ico.org.uk/for-organisations/*

*Comply with the provisions of Data Protection legislation which includes, but not limited to:*

* *The General Data Protection Regulation (GDPR)*
* *Data Protection Act 2018 (DPA)*
* *Privacy and Electronic Communications Regulations (PECR)*

*Follow the standards prescribed by the Agreement document which includes processes for sharing information on both a routine and ad-hoc basis.*

*All Partner organisations agree to be responsible for ensuring measures are in place to guarantee the security and integrity of data are sufficiently trained to understand their responsibilities and comply with the law. Organisations will recognise that this document encourages sharing of data but does not alter the statutory duties of those organisations signed up to it.*

**SIGNED** for and on behalf of **[Org Name]**

Signature

Name (Print)

Position

Date:

Witness Signature

Name (Print)

Address:

Occupation: