



## Wales Accord on the Sharing of Personal Information

# Information Sharing Protocol for **Tackling Anti-Social Behaviour**

ASB Draft Version 02 2023

Date Assured [To be added by WASPI Team]

Quality Assurance Group [To be added by WASPI Team]

Further information on how an ISP should be developed in line with the WASPI framework is contained within the **Guide on the Development of Information Sharing Protocols**

Further guidance may be sought from the WASPI Service Integration and Development Team at:  
[www.waspi.org](http://www.waspi.org)

**Note:** This page can be removed once the ISP development has commenced

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## 1 Introduction to this ISP

- 1.1 This Information Sharing Protocol (ISP) is supplementary to the Wales Accord on the Sharing of Personal Information (WASPI) and has been agreed following consultation between the participating partner organisations.
- 1.2 This ISP is intended to help practitioners understand what information can be shared between the listed partners for the stated purpose(s). It also provides assurance that the partners have considered the requirements of data protection legislation.
- 1.3 This ISP has been prepared to support the regular sharing of personal information for the purpose of adopting a multi-agency, problem-solving approach to tackling anti-social behaviour.
- 1.4 Personal information is shared for the purpose of reducing and preventing anti-social behaviour and the impact the behaviour can have on victims and those in the locality. The aim is to protect individuals, their property and reduce repeat victimisation. The sharing of information will help identify vulnerable victims and enable us to provide them with the necessary support. The sharing will also aid the identification of offenders of anti-social behaviour and will enable the agencies to effectively deal with the behaviour by way of diversion, engagement, support, education or prosecutions.

## 2 The information sharing partner organisations

- 2.1 The table below sets out the organisational partners to the ISP, the key contact points and the departments, divisions and teams typically involved in sharing information for the purposes described in this ISP.

Information Sharing Partner Organisations	Owner / Point of contact	Departments / Divisions / Teams
Ateb Housing Association	Housing Manager	Housing & ASB
Bro Myrddin Housing Association	Housing Manager	Housing & ASB
Barcud Housing Association	Housing Manager	Housing & ASB
Caredig Housing	Housing Manager	Housing & ASB
Carmarthenshire County Council (Includes Carmarthenshire Youth Support Service)	Department Head	All Departments
Ceredigion County Council (Includes Ceredigion Youth Offending Team).	Department Head	All Departments
Clwyd Alyn Housing	Housing Manager	Housing & ASB
Cymdeithas Gofal / The Care Society	Services Manager	All departments
DWR CYMRU / Welsh Water	Security Manager	Security Dept.
Dyfed Drug and Alcohol Service-DDAS (Barod)	Manager	All Departments

Dyfed-Powys Police (Including Goleudy)	Chief Insp. Neighbourhood Policing Team	All Departments
Goleudy Housing	Housing Manager	Housing & ASB
Grwp Cyneifin	Housing Manager	Housing & ASB
Hafan Cymru	Housing Manager	Housing & ASB
H.M Prison and Probation Service Wales	Head of Dyfed Powys Local Delivery Unit	All Departments
Hywel Dda University Health Board	Security Manager	All Departments
Kaleidoscope Powys	Manager	All Departments
Melin Homes	Housing Manager	Housing & ASB
Mid and West Wales Fire and Rescue Service	Fire Safety Officer	All Departments
Milford Haven Port Authority	Harbour Master	Port Authority
Natural Resources Wales	Manager	All Departments
Newydd Housing	Housing Manager	Housing & ASB
OPCC Dyfed Powys Police	Office of Police and Crime Commissioner	Office of Police and Crime Commissioner
Pembrokeshire County Council	Customer Service Manager  Duty Manager  Team Leader  Consultant Social Worker  Youth Offending Team Manager  Street Care and Parking Manager  Environmental Health Officer  Senior Housing Officer	Adult Services  Child Safeguarding  Community Safety, Poverty and Regeneration  Integrated Family Support Team  Pembrokeshire Youth Service  Street Care  Public Protection  Housing
Pobl Housing Association	Housing Manager	Housing & ASB
Powys County Council (Includes Powys Youth Justice team).	Department Lead or Manager	All Departments
Powys Teaching Health Board	Manager	All Departments
The Wallich	Housing Manager	Housing & ASB
The Welsh Ambulance Service	Head of Operations	All Departments
Wales and West Housing Association	Housing Manager	All Departments

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- 2.2 The ISP owners / points of contact have overall responsibility for this ISP within their respective organisations and must therefore ensure the ISP is disseminated, understood and acted upon by relevant practitioners.
  - 2.3 The owners / point of contact for each partner organisation will regularly monitor and review the use of this ISP to ensure information is shared effectively and appropriately.
  - 2.4 Once the ISP has been assured, each partner organisation will nominate a signatory to sign the ISP at Appendix C. The signatory will be an appropriate person from the partner organisation who can sign on behalf of the organisation.

### **3 Specific organisational / practitioner obligations**

- 3.1 Any breaches of security, confidentiality and other violations of this ISP must be reported in line with each partner organisation's incident reporting procedures. Consideration should be given to sharing the outcome of any investigation, where appropriate, with other partners to the ISP.
- 3.2 Practitioners who share information in line with this ISP should make themselves aware of, and adhere to, their organisation's Information Governance and records management procedures; in particular the provisions that relate to collecting, processing and disclosing personal information.
- 3.3 Every reasonable step should be taken to ensure that inaccurate personal data are erased or rectified without delay. Consideration must be given to advising partner organisations that they may have received inaccurate information. In circumstances where partner organisations cannot be informed, advice should be taken from an Information Governance lead (or equivalent).

### **4 Legislative / statutory powers**

**STAFF SHOULD NOT HESITATE TO SHARE PERSONAL INFORMATION IN ORDER TO PREVENT ABUSE OR SERIOUS HARM, IN AN EMERGENCY OR IN LIFE-OR-DEATH SITUATIONS.**

**IF THERE ARE CONCERNS RELATING TO CHILD OR ADULT PROTECTION ISSUES, THE RELEVANT ORGANISATIONAL PROCEDURES MUST BE FOLLOWED**

- 4.1 The sharing arrangements described in this ISP takes into account the relevant data protection legislation, the Human Rights Act 1998 and the common law duty of confidence.
- 4.2 Before sharing personal information, partner organisations must have identified a clear legal basis for doing so.
- 4.3 Data protection legislation includes the concept of:
  - **'personal data'**; any information relating to an identified or identifiable (living) natural person, and
  - **'special categories of data' / 'sensitive processing'**; personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation

Whilst information about deceased people is not covered by data protection legislation, data about deceased people is covered by a similar level of confidence.

- 4.4 Further information and guidance on lawful processing of personal information can be found on the Information Commissioner's website; [www.ico.org.uk](http://www.ico.org.uk)
- 4.5 Partner organisations also need to ensure they take into account the Data Protection Act 2018 and any additional requirements it places on the use of the legal bases set out in Articles 6, 9 and 10 of UK GDPR (see Part 2 of the Act) and processing for the 'law enforcement purposes' (see Part 3 of the Act). The ICO has guidance on this matter and queries about the relevance of any legal basis should be raised with an Information Governance lead.
- 4.6 Consent to process personal data should not be confused with consent to receive the service. The two are separate and should not be confused or merged.

### HOW TO USE THE TABLES

The following tables are designed to allow partners to this agreement to highlight the lawful bases relevant to the sharing described in this ISP. Please consider the guidance below, and take advice from your Data Protection Officer or equivalent. Definitions of terms can be found at Appendix A.

#### **TABLES 1 & 2 – personal data and special categories of personal data**

In most cases, information sharing partners will need to:

- Select at least one lawful basis from table 1 (sharing personal data), **and**
- Select at least one lawful basis from table 2 (processing special categories of data).

Notes: Usually, only one lawful basis should be selected in table 1 and one in table 2. If more than one lawful basis is selected in either table (for example if partner organisations are relying on different lawful bases), please add an explanatory note.

#### **TABLE 3 – personal data about criminal convictions, offences etc.**

- The lawful basis for sharing personal data about criminal convictions, offences or related security measures should be recorded in table 3.
- You **will always** have to complete table 1.
- If you are sharing special categories of personal data, you will also have to complete table 2.

#### **TABLE 4 – processing by competent authorities for law enforcement purposes** (as defined by Part 3 of the Data Protection Act 2018).

- Complete table 4 only if personal data is being processed by competent authorities **and** only for law enforcement purposes.
- If information is being shared for law enforcement and other purposes you may also need to complete tables 1, 2 & 3.

**Table 1 - Article 6 - Personal Data**

Legal basis	Check box / Notes
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Consent – Art 6(1)(a)	<p>☒</p> <p>Where there is a requirement to share information between partners and there is an absence of Statutory or Safeguarding provision for doing so then consent must be obtained from the subject. Examples of Instances where this may occur are:</p> <p>Victims, witnesses, or vulnerable persons affected by or in danger of being affected by ASB that a Partner Agency may wish to refer on to Goleudy, 3<sup>rd</sup> Sector or Voluntary Organisation for additional support.</p> <p>Vulnerable Adults who do not quite meet thresholds for safeguarding intervention, but Partner Agency are of the opinion that they could benefit from the assistance of another agency or service.</p> <p>Parents and children who have come to notice of an Agency who would not meet the threshold of information sharing in respect of safeguarding or management of ASB, however that agency believes that the parent / child would benefit from a service provided by another Partner Agency, Service Provider, 3<sup>rd</sup> Sector, or Charitable Organisation and introduction is necessary to that organisation (For example Youth Services proactive work with children and provision of voluntary parenting courses).</p> <p>Consent must be:</p> <p>Expressly given and recorded in writing. Subject must be able to understand what they are consenting to and how that information will be used and the implications of providing or not providing that consent. Where consent is withdrawn information sharing must stop.</p> <p>Where the subject is a child or young person the Partner Agency should consider whether they have the capacity to understand the implications of giving consent in that circumstance. Where they have capacity then consent should be from them rather than the parent so long as they fully understand.</p> <p>Consent is not a permanent state. It should be reviewed during service provision and partners should exercise their professional judgement as to whether it is appropriate to revisit consent with the subject. It should take place in context of review, re assessment and new information and change of circumstance.</p> <p>Consent obtained from the subject in connection to this ISP will only be used to support the delivery of services of this ISP. Once that has concluded the consent will also end.</p> <p>Where consent has previously been obtained, due to change of circumstance or new information and it now facilitates the sharing of information by any of the Authorities below. The subject should be informed.</p> <p>This section is applicable to all partners to the ISP</p>
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<p>Necessary for compliance with a legal obligation – Art 6(1)(c)</p>	<p>☒</p> <p>Section 17 of the Crime and Disorder Act 1998 requires Responsible Authorities to do all that they reasonably can to prevent crime and disorder in their areas.</p> <p>Section 6 of the Crime and Disorder Act 1998 requires Dyfed Powys Police, Local Authorities and Statutory Agencies to have a strategy for the reduction of crime and disorder (inclusive of anti-social behaviour, misuse of drugs, alcohol, other harmful substances, and incidents of re offending). As part of that process, they are expected to share information.</p> <p>The above is applicable to Police, Health Authorities, Local Authorities, Statutory Agencies such as Natural Resources Wales and any other Agency, Housing Provider or Company performing functions delegated to them.</p>
<p>Task carried out in the public interest or in the exercise of official authority – Art 6(1)(e)</p>	<p>☒</p> <p>Section 17 of the Crime and Disorder Act 1998 Requires, Responsible Authorities to do all that they reasonably can to prevent, crime and disorder in their areas.</p> <p>Section 6 of the Crime and Disorder Act 1998 requires Dyfed Powys Police, Local Authorities and Statutory Agencies to have a strategy for the reduction of crime and disorder (inclusive of anti-social behaviour, misuse of drugs, alcohol, other harmful substances, and incidents of re offending).</p> <p>Section 115 of the Crime and Disorder Act 1998 empowers sharing of personal information between relevant authorities where necessary or expedient for the purposes of any provision of the Act.</p> <p>Pt 3. Schedule 8 Data Protection Act 2018 provides for the lawfulness of processing in the public interest and that it is necessary for the:</p> <ul style="list-style-type: none"> <li>(a) the administration of justice,</li> <li>(b) the exercise of a function of either House of Parliament,</li> <li>(c) the exercise of a function conferred on a person by an enactment or rule of law,</li> <li>(d) the exercise of a function of the Crown, a Minister of the Crown or a government department, or</li> <li>(e) an activity that supports or promotes democratic engagement</li> </ul> <p>Sec 14 Anti-Social Behaviour, Crime and Policing Act 2014 in most circumstances requires an applicant to consult and share information with appropriate bodies prior to application for Order.</p> <p>The above is applicable to Police, Health Authorities, Local Authorities, Statutory Agencies such as Natural</p>

	<p>Resources Wales and any other Agency, Housing Provider or Company performing functions delegated to them.</p> <p>Section 7 Fire Services Act: FRS “must make provision for the purpose of protecting life and property in the event of fires and we must make arrangements for obtaining the information necessary in order to do this” .Section 11 (2) (a) FRS may take any action we consider appropriate in response to an event or situation that causes or is likely to cause one or more individuals to die, be injured or become ill.</p> <p>The above is relied upon by Mid and West Wales Fire and Rescue Service.</p>
Legitimate Interest – Art 6(1)(f)	<p><input checked="" type="checkbox"/></p> <p>Section 17 of the Crime and Disorder Act 1998 imposes a duty on Responsible Authorities to exercise their functions in a way that would assist in the reduction of Crime and Disorder. As part of this process, they are required to share information.</p> <p>The above is applicable to Police, Health Authorities, Local Authorities, Statutory Agencies such as Natural Resources Wales and any other Agency, Housing Provider or Company performing functions delegated to them.</p>

**Table 2 - Article 9 - Special Categories of Personal Data**

Legal basis	Checkbox / Notes
Explicit Consent – Art 9(2)(a)	<p><input checked="" type="checkbox"/></p> <p>Express written consent from subject required</p>
Legitimate Activities – Art 9 (2)(d)	<p><input checked="" type="checkbox"/></p> <p>The administration of justice</p> <p>The exercise of any functions conferred on any person by or under an Act of Parliament, Codes or Statutory Guidance that accompanies the Primary Legislation.. (For example The Anti-social Behaviour, Crime and Policing Act 2014 and : Anti-social Behaviour, Crime and Policing Act 2014 Anti-social behaviour powers Statutory guidance for frontline professionals Revised in January 2021).</p> <p>Statutory obligations in respect of - Anti Social Behaviour Case reviews (also known as The</p>

	<p>Community Trigger). Sections 104 and 105 of the Anti-social Behaviour, Crime and Policing Act 2014</p> <p>To protect a child from harm or risk of harm Children's Acts 1933 and 1989</p> <p>To protect a Vulnerable adult from serious harm or risk of serious harm. The Mental Capacity Act 2005 (where a person lacks capacity to give consent).</p>
Necessary for reasons of substantial public interest - Art 9(2)(g)	<p><input checked="" type="checkbox"/> UK GDPR Art 9(2)(g) requires a basis in UK law, which is provided by Section 10(3) of the Data Protection Act 2018.</p> <p>This in turn refers to the need to meet a relevant condition in Part 2 of Schedule 1 of the DPA 2018. The relevant condition is:</p> <p>Where there is a need to share information in an emergency:</p> <p>In order to preserve life;</p> <p>Where a person may be a risk to the public.</p> <p>To prevent abuse or serious harm to others;</p> <p>To prevent serious crime and to support the detection, investigation and punishment of serious crime</p>

**Table 3 - Article 10 - Personal Data about criminal convictions, offences or related security measures**

The sharing of personal data relating to criminal convictions, offences or related security measures	<p><i>[You should have already selected a lawful basis for processing under Article 6]</i></p> <p>Processing is:</p> <p><input checked="" type="checkbox"/> Carried out under the control of an official authority / competent authority <i>[if ticked, move to table 4]</i></p> <p>_____ and/or _____</p>
	<p><input type="checkbox"/> Meets a relevant condition in Part 1, 2 or 3 of Schedule 1 of the Data Protection Act 2018. The relevant condition is:</p> <p><i>[Detail which condition under Part 1, 2 or 3 of Schedule 1 is being relied upon, copying in the text and adding further explanation where required.]</i></p>

**Table 4 - Competent authorities for Law Enforcement Purposes**

Processing <b>personal data</b> for law enforcement purposes	<p>The Data Protection Act 2018, Part 3, Chapter 2, Section 35(2) outlines the legal bases for sharing personal data for law enforcement purposes. The processing is based on law and (select one):</p> <p><input type="checkbox"/> 35(2)(a) The data subject has given consent.</p> <p>_____ or _____</p>
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	<p><input checked="" type="checkbox"/> 35(2)(b) The processing is necessary for the performance of a task carried out for that purpose by a competent authority.</p> <p>The prevention and detection of Crime and Disorder (Inclusive of Anti-social Behaviour and Drugs). Police, Local Authorities, Health Authorities, Statutory Partners and Housing associations (performing functions of Local Authority Housing) and 3<sup>rd</sup> sector (if interested party).</p>
<p><b>Sensitive processing / processing special categories of personal data</b> for law enforcement purposes</p>	<p><i>[You should have already selected either 35(2)(a) or 35(2)(b) above]</i></p> <p><i>These legal bases also requires an Appropriate Policy Document, each organisation should meet this requirement prior to sharing.]</i></p> <p>The Data Protection Act 2018, Part 3, Chapter 2, Section 35(3) outlines the legal bases for sharing sensitive / special categories of data for law enforcement purposes.</p> <p>The legal basis is (select one):</p> <p><input type="checkbox"/> 35(4) The data subject has given consent</p> <p>_____ or _____</p>
	<p><input checked="" type="checkbox"/> 35(5) The processing is strictly necessary for the law enforcement purpose, and</p> <p>Meets a relevant condition in Schedule 8. The relevant condition is:</p> <p>The conditions relevant for sensitive processing in Schedule 8 of the Act relevant: Article 9(2) Substantial public interest - permits you to process special category data if it is:</p> <p>necessary for judicial and statutory purposes – for reasons of substantial public interest.</p> <p>necessary to protect the vital interests of the data subject or another individual.</p> <p>necessary for the safeguarding of children and of individuals at risk.</p> <p>Meeting at least one of the 23 specific substantial public interest conditions set out in Schedule 1:</p> <p>Conditions relevant: Preventing or detecting unlawful acts; Protecting the public; Preventing fraud; Safeguarding of children and individuals at risk.</p> <p>The prevention and detection of Crime and Disorder (Inclusive of Anti-social Behaviour and Drugs). Police, Local Authorities, Health Authorities, Statutory Partners and Housing associations (performing functions of Local Authority Housing) and 3<sup>rd</sup> sector (if interested party).</p>

## 5 Personal information to be shared

- 5.1 Only the **minimum necessary** personal information consistent with the purposes set out in this document can be shared. Anonymised and pseudonymised information should be used where possible.
- 5.2 Information provided by partner organisations will not generally be released to any third party without prior consultation with the originating partner organisation.
- 5.3 An information reference table at Appendix B provides details of the information exchanges associated with this ISP, including the typical categories of information

shared, the organisations involved and the parts of the organisation typically involved. As controllers in their own right, partner organisations are responsible for ensuring the appropriate staff have access to personal information that is adequate, relevant and limited to what is necessary for the intended purpose.

- 5.4 The following table sets out the personal information commonly shared to identify data subjects and ensure partner organisations are referring to the same data subject:

Personal identifiers	Select all that apply
Name (including aliases)	<input checked="" type="checkbox"/>
Date of birth	<input checked="" type="checkbox"/>
Address	<input checked="" type="checkbox"/>
Postcode	<input checked="" type="checkbox"/>
Other reference number (eg NHS number, National Insurance number, any system/service number )	<input type="checkbox"/>
[insert rows as required but note that the information required to identify a data subject should not include any special categories / sensitive data. Neither should the information be excessive – usually name, address, date of birth and a reference number should be enough to identify a data subject]	<input type="checkbox"/>

## 6 Data Subjects' Rights

- 6.1 Data protection legislation provides various individual rights for data subjects. Advice on how these rights should be met should be sought from each organisation's Information Governance representative, Data Protection Officer or equivalent. Specific guidance on these rights is available on the Information Commissioner's website; [www.ico.org.uk](http://www.ico.org.uk)
- 6.2 The following paragraphs refer to key rights associated with sharing personal information.
- 6.3 Unless doing so would risk harm to them or others, or hinder any investigation or legal proceedings, data subjects should be informed how and why their personal information will be processed and who it is shared with (the Right to be Informed). Ideally, this information – often provided in what is commonly referred to as a privacy notice - will be provided at the first point of contact. It can be part of a registration / consent form or a standalone document.
- 6.4 A layered approach is often appropriate. This could involve a high level organisational statement supplemented by specific service level information; for example a website or leaflet and verbal information provided by a practitioner.
- 6.5 Information should be clear and particular care should be taken when relying on consent as the legal basis for sharing information, or where working with children, as there are additional requirements to consider. Further information on the 'Right to be Informed' is available on the Information Commissioner's website; [www.ico.org](http://www.ico.org)
- 6.6 For the purposes of this ISP, partner organisations should set out below how they meet the requirements of the Right to be Informed. Ideally, a consistent message will be provided and it may be helpful to agree a standard service level privacy notice.

Name of Organisation	Method of Informing	Name of document / website	Comments
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	(select any that apply)		
Ateb Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.atebgroup.co.uk/privacy">https://www.atebgroup.co.uk/privacy</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Barcud Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="http://www.barcud.cymru/privacy-policy/">www.barcud.cymru/privacy-policy/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Bro Myrddin Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.bromyrddin.co.uk/?s=privacy">https://www.bromyrddin.co.uk/?s=privacy</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour


			(ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Ceredig Housing Provider	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy - Ceredig	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Carmarthenshire County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Notices (gov.wales)	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Ceredigion County Council	Website <input checked="" type="checkbox"/>	Privacy Notice - Ceredigion County Council	This agency informs their

(Includes Ceredigion Youth Offending Team).	Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>		service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Clwyd Alyn	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy : ClwydAlyn Housing	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Cymdeithas Gofal / The Care Society	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy - The Care Society	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies



			listed in column 1. This will be done as per methods used in column 2.
DWR CYMRU / Welsh Water	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy   Dwr Cymru Welsh Water	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Dyfed Drugs and Alcohol Service –DDAS (Barod)	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://barod.cymru/privacy-cookies/">https://barod.cymru/privacy-cookies/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Dyfed Powys Police (Includes Goleudy Services)	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Notice   Dyfed-Powys Police	This agency informs their service users that information regarding

	Other (specify in comments)		them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Goleudy (Housing Provider)	Website <input checked="" type="checkbox"/> Leaflet Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other (specify in comments)	Goleudy   Privacy Policy	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Grwp Cyneifin	Website <input checked="" type="checkbox"/> Leaflet Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other (specify in comments) <input type="checkbox"/>	<a href="http://www.grwpcynefin.org/en/about-us/policies">http://www.grwpcynefin.org/en/about-us/policies</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per

			methods used in column 2.
Hafan Cymru	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.hafancymru.co.uk/personal-data-privacy-notice/">https://www.hafancymru.co.uk/personal-data-privacy-notice/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
H.M Prison and Probation Services Wales	Website <input checked="" type="checkbox"/> Leaflet <input checked="" type="checkbox"/> Form <input checked="" type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	 HMPPS Privacy Notice.pdf	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Hywel Dda University Health Board	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://hduhb.nhs.wales/about-us/governance-arrangements/your-information-your-rights/privacy-notices/">https://hduhb.nhs.wales/about-us/governance-arrangements/your-information-your-rights/privacy-notices/</a>	This agency informs their service users that information regarding them being

			involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Kaleidoscope	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.kaleidoscopeproject.org.uk/privacy-notice/">https://www.kaleidoscopeproject.org.uk/privacy-notice/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Melin Homes	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy (melinhomes.co.uk)	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods

			used in column 2.
Mid and West Wales Fire and Rescue Service	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input checked="" type="checkbox"/> <i>(specify in comments)</i>	Your Data and Privacy - Mid and West Wales Fire and Rescue Service (mawwfire.gov.uk)	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Milford Haven Port Authority	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input checked="" type="checkbox"/> <i>(specify in comments)</i>	<a href="http://www.mhpa.co.uk/privacy-policy/">www.mhpa.co.uk/privacy-policy/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Natural Resources Wales	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Natural Resources Wales / Privacy notice	This agency informs their service users that information regarding them being

			involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Newydd Housing	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.newydd.co.uk/about-us/our-privacy-notice">https://www.newydd.co.uk/about-us/our-privacy-notice</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Office of Police and Crime Commissioner – Dyfed Powys Police	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	opcc- <b>privacy</b> -notice-cym-feb-2021.pdf	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods

			used in column 2.
Pembrokeshire County Council	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://www.pembrokeshire.gov.uk/information-governance">https://www.pembrokeshire.gov.uk/information-governance</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Pobl Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Policy – Pobl Living	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Powys County Council (Includes Powys Youth Justice Team).	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Data Protection and Privacy - Powys County Council	This agency informs their service users that information regarding them being involved in or affected

			by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Powys Teaching Health Board	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="http://www.powysthb.wales.nhs.uk/privacy-noti">http://www.powysthb.wales.nhs.uk/privacy-noti</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
The Wallich	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	<a href="https://thewallich.com/privacy-statement/">https://thewallich.com/privacy-statement/</a>	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.



The Welsh Ambulance Service	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Welsh Ambulance Service NHS Trust - Privacy Statement (wales.nhs.uk)	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods used in column 2.
Wales and West Housing Association	Website <input checked="" type="checkbox"/> Leaflet <input type="checkbox"/> Form <input type="checkbox"/> Verbal <input checked="" type="checkbox"/> Other <input type="checkbox"/> <i>(specify in comments)</i>	Privacy Notice & Legal - Wales & West Housing Association (wwha.co.uk)	This agency informs their service users that information regarding them being involved in or affected by Anti-social Behaviour (ASB) will be shared with Partner agencies listed in column 1. This will be done as per methods

			used in column 2.
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- 6.7 All participating organisations will have in place policies and procedures to uphold the confidentiality, integrity and availability of personal information with specific reference to the retention, storage and disposal of records.
- 6.8 Requests for the information referenced in this ISP will be dealt with in accordance with each partner organisation's relevant policies and procedures.
- 6.9 Each partner organisation will put in place a formal procedure by which data subjects, partner organisations and practitioners can direct any complaints regarding the information sharing documented in this ISP.
- 6.10 There is an expectation that partners to this ISP will work together to keep all partners informed of any complaints or requests for information received from data subjects or third parties. The partners will also keep each other informed of any problems associated with the information sharing practices documented in this ISP and there is an expectation that they will collaborate to develop and improve these practices.

## **7 Information security**

- 7.1 Each partner organisation must have an appropriate and adequate security framework.
- 7.2 Practitioners carrying out the functions outlined in this ISP should make themselves aware of, and adhere to, their organisation's information security policies and procedures.
- 7.3 A detailed list of agreed methods for the safe and secure transfer of personal information is documented within Appendix B.
- 7.4 All partners must ensure adequate and appropriate training on the subjects of data protection and confidentiality is provided to all staff with access to personal data.

## **8 Review, Breaches and Termination of this Agreement**

- 8.1 This ISP will be reviewed two years from signing this document or sooner if appropriate. There is guidance available on the WASPI website about the process for reviewing an ISP.
- 8.2 Breaches of this agreement should be reported to the Owners / Contact Points in Section 2, which may result in the information sharing set out in this agreement ceasing.
- 8.3 Partners to this agreement will determine the responsibilities following termination of this agreement, including the deletion of shared data or its return to the organisation that supplied it originally.

## 9 Appendix A – Glossary of Terms

Term	Definition
<b>Appropriate Policy Document</b>	<p>The Data Protection Act 2018 outlines the requirement for an Appropriate Policy Document to be in place when processing special category and criminal offence data under certain specified conditions.</p> <p>Detail on Appropriate Policy Documents can be found in Schedule 1, Part 4 of the DPA 18 and Section 42 of the DPA 18 for competent authorities.</p>
<b>Data Protection Act 2018</b>	<p>The UK's third generation of data protection law replaces the Data Protection Act 1998. The 2018 Act accepts the standards and obligations set by UK GDPR and, where UK GDPR allows, makes specific provisions relevant to the UK.</p> <p>The 2018 Act also transposes EU Data Protection Directive 2016/680 (Law Enforcement Directive) into domestic UK law.</p> <p>It is important the UK GDPR and the DPA 2018 are read side by side.</p>
<b>Data Protection Officer</b>	<p>Certain categories of organisation, including any public body or authority (except courts in their judicial capacity) are required to designate a suitably qualified Data Protection Officer (DPO). The tasks of the DPO are set out in Article 39 of UK GDPR.</p>
<b>Data subject</b>	<p>A 'data subject' is an identified or identifiable natural person. Organisations may refer to data subjects as service users, patients, clients, citizens, etc but for consistency, WASPI framework documentation refers to data subjects.</p>
<b>UK GDPR</b>	<p>The UK General Data Protection Regulation (UK GDPR) lays down laws relating to the protection of natural persons with regard to the processing of personal data and rules relating to the free movement of personal data. This Regulation protects fundamental rights and freedoms of natural persons and in particular their right to the protection of personal data.</p>
<b>Law Enforcement Purposes</b>	<p>The purposes of the prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security (DPA 2018 Part 3, Chapter 1, Section 31).</p>
<b>Personal data</b>	<p>'personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.</p>

<b>Personal data about criminal convictions, offences or related security measures</b>	This includes personal data which relates to the alleged commission of offences by the data subject, or proceedings for an offence committed or alleged to have been committed by the data subject or the disposal of such proceedings, including sentencing. (DPA 2018 Section 11(2))
<b>Personal identifiers</b>	A set of basic personal details that allow partner organisations to identify a data subject.
<b>Personal information</b>	Includes information falling within the definition of 'personal data' and information about deceased individuals. Data protection legislation does not apply to information about deceased individuals but such information needs to be treated confidentially and WASPI should be applied to this information.
<b>Practitioner</b>	An inclusive term that refers to those involved in the care, education, welfare of data subjects; ie those who provide a public service.
<b>Processing personal data</b>	'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.' (UK GDPR Art 4(2))
<b>Special categories of data / sensitive processing</b>	Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. (UK GDPR Art 9(1))
<b>[Insert further terms as appropriate]</b>	

## Appendix B – Information Reference Table for Anti-Social Behaviour

This table sets out the why, what, when and how of information sharing in detail. Guidance on completing this section can be found on the website

	Description	ASB referrals	Information Sharing	Problem Solving Groups
1	<b>Information exchange</b> <i>General description of the process or stage to which the information sharing relates.</i>	<p>Dyfed Powys Police, Local Authorities, Health Authorities, Statutory Partners, Housing associations, and 3<sup>rd</sup> Sector organisations (if interested party), on becoming aware of Anti- Social Behaviour or vulnerabilities will wish to share information. So that they may work together to apply a problem- solving approach to the ASB.</p> <p>Information may be shared at the initial point of referral.</p> <p>When there is a change in information or circumstances.</p> <p>At review stage to facilitate learning and better problem solving and partnership relationships.</p>	<p>Dyfed Powys Police, Local Authorities, Health Authorities, Statutory Partners, Housing associations, and 3<sup>rd</sup> Sector organisations (if interested party), when managing Anti-Social Behaviour or Vulnerabilities after the initial referral stage may need to continue to share information backwards and forwards. This is so that they may be able to effectively identify the cause or contributors to the Anti-Social Behaviour. Its effects on the Victim, individuals or Community and identify what measures may be taken to remove stop the ASB or reduce its effect.</p> <p>Information may be shared at the initial point of referral. When there is a change in information or circumstances.</p> <p>Where there is a need for partners to work together closely to resolve issues.</p> <p>At review to facilitate learning and better problem solving and partnership relationships.</p>	<p>Dyfed Powys Police, Local Authorities, Health Authorities, Statutory Partners, Housing associations, and 3<sup>rd</sup> Sector organisations (if interested party), when managing Anti- Social Behaviour or vulnerabilities will wish to share information in respect of that Anti-Social Behaviour or vulnerabilities with the other partners within the confines of a Problem Solving Group Meeting. So that the skills and experiences of different disciplines may be pooled to find an appropriate approach to tackling the issue and therefore either remedying the matter or reducing its effect.</p> <p>Information may be shared at the initial point of referral.</p> <p>When there is a change in information or circumstances.</p> <p>Where there is a need for partners to work together closely to resolve issues.</p> <p>At review to facilitate learning and better problem solving and partnership relationships.</p>

2	<p><b>What information will be shared?</b></p> <p><i>Describe the information to be shared – you do not need to go to ‘field level’ detail.</i></p> <p><b><u>Please note: Only the minimum and relevant personal information is to be shared and strictly on a case by case basis.</u></b></p>	<p>Demographic Information- Perpetrators &amp; Victims where necessary to include: name, aliases, date of birth, gender, ethnicity, address, landlord, parent/guardian/ appropriate adult, school/college.</p> <p>Vulnerabilities: physical or mental disability, child protection/safeguarding issues identified.</p> <p>Key Agencies: Current support, support worker, social services.</p> <p>Incident Detail: Details of incidents or alleged incidents, location.</p> <p>Risk assessments.</p> <p>Action plans, actions already taken by referrer, Niche RMS reference number (records management system used by Dyfed-Powys Police) and MAVIS reference number (ASB case management system used by Dyfed-Powys Police pre-introduction of Niche RMS</p>	<p>Demographic Information- Perpetrators &amp; Victims where necessary to include: name, aliases, date of birth, gender, ethnicity, address, landlord, parent/guardian/ appropriate adult, school/college.</p> <p>Vulnerabilities: physical or mental disability, child protection/safeguarding issues identified.</p> <p>Key Agencies: Current support, support worker, social services.</p> <p>Incident Detail: Details of incidents or alleged incidents, location.</p> <p>Risk assessments.</p> <p>Action plans, action already taken by referrer Niche RMS reference number (records management system used by Dyfed-Powys Police) and MAVIS reference number (ASB case management system used by Dyfed-Powys Police pre-introduction of Niche RMS</p>	<p>Demographic Information- Perpetrators &amp; Victims where necessary to include: name, aliases, date of birth, gender, ethnicity, address, landlord, parent/guardian/ appropriate adult, school/college.</p> <p>Vulnerabilities: physical or mental disability, child protection/safeguarding issues identified.</p> <p>Key Agencies: Current support, support worker, social services.</p> <p>Incident Detail: Details of incidents or alleged incidents, location.</p> <p>Risk assessments.</p> <p>Action plans, action already taken by referrer, Niche RMS reference number (records management system used by Dyfed-Powys Police) and MAVIS reference number (ASB case management system used by Dyfed-Powys Police pre-introduction of Niche RMS</p>
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<b>3</b>	<b>Partner Organisation(s)</b>  <i>Details of provider and recipient organisation(s)</i>  <i>Ensure the organisations listed reflect section 2 of the ISP i.e. are all organisations listed in section 2</i>	<b>Who by</b>  Dyfed Powys Powys Police ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of Ceredigion Youth Offending Team). Ceredigion County Council (Inclusive of	<b>Who to</b>  ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of Ceredigion Youth Offending Team). Clwyd Alyn	<b>Who by</b>  Dyfed Powys Powys Police ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of Ceredigion Youth Offending Team). Ceredigion County Council (Inclusive of	<b>Who to</b>  ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of Ceredigion Youth Offending Team). Clwyd Alyn	<b>Who by</b>  Dyfed Powys Powys Police ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of	<b>Who to</b>  ATEB Housing Association Barcud Housing Association Bro Myrddin Housing Association Caredig Housing Carmarthenshire County Council (Inclusive of Carmarthenshire Youth Service) Ceredigion County Council (Inclusive of Ceredigion Youth Offending Team). Clwyd Alyn

		Ceredigion Youth Offending Team).	Cymdeithas Gofal / The Care Society	Ceredigion Youth Offending Team).	Cymdeithas Gofal / The Care Society	Ceredigion Youth Offending Team).	Cymdeithas Gofal / The Care Society
		Clwyd Alyn	Dwr Cymru / Welsh Water	Clwyd Alyn	Dwr Cymru / Welsh Water	Clwyd Alyn	Dwr Cymru / Welsh Water
		Cymdeithas Gofal / The Care Society	Dyfed Drugs and Alcohol Service-DDAS. (Barod).	Cymdeithas Gofal / The Care Society	Dyfed Drugs and Alcohol Service-DDAS. (Barod).	Cymdeithas Gofal / The Care Society	Dyfed Drugs and Alcohol Service-DDAS. (Barod).
		Dwr Cymru / Welsh Water	Goleudy Housing	Dwr Cymru / Welsh Water	Goleudy Housing	Dwr Cymru / Welsh Water	Goleudy Housing
		Dyfed Drugs and Alcohol Service-DDAS. (Barod).	Grwp Cynefin	Dyfed Drugs and Alcohol Service-DDAS. (Barod).	Grwp Cynefin	Dyfed Drugs and Alcohol Service-DDAS. (Barod).	Grwp Cynefin
		Goleudy Housing	Hafan Cymru	Goleudy Housing	Hafan Cymru	Goleudy Housing	Hafan Cymru
		Grwp Cynefin	H.M Prison and Probation Services Wales	Grwp Cynefin	H.M Prison and Probation Services Wales	Grwp Cynefin	H.M Prison and Probation Services Wales
		Hafan Cymru	Hywel Dda University Health Board	Hafan Cymru	Hywel Dda University Health Board	Hafan Cymru	Hywel Dda University Health Board
		H.M Prison and Probation Services Wales	Kaleidoscope Powys	H.M Prison and Probation Services Wales	Kaleidoscope Powys	H.M Prison and Probation Services Wales	Kaleidoscope Powys
		Hywel Dda University Health Board	Melin Homes	Hywel Dda University Health Board	Melin Homes	Hywel Dda University Health Board	Melin Homes
		Kaleidoscope Powys	Mid & West Wales Fire Service	Kaleidoscope Powys	Mid & West Wales Fire Service	Kaleidoscope Powys	Mid & West Wales Fire Service
		Melin Homes	Milford Haven Port Authority	Melin Homes	Milford Haven Port Authority	Melin Homes	Milford Haven Port Authority
		Mid & West Wales Fire Service	Natural Resources Wales	Mid & West Wales Fire Service	Natural Resources Wales	Mid & West Wales Fire Service	Natural Resources Wales
		Milford Haven Port Authority	Newydd Housing	Milford Haven Port Authority	Newydd Housing	Milford Haven Port Authority	Newydd Housing
		Natural Resources Wales	Office of Police and Crime Commissioner – Dyfed Powys Police.	Natural Resources Wales	Office of Police and Crime Commissioner – Dyfed Powys Police.	Natural Resources Wales	Office of Police and Crime Commissioner – Dyfed Powys Police.
		Newydd Housing		Newydd Housing		Newydd Housing	



		<div>Office of Police and Crime Commissioner – Dyfed Powys Police.</div> <div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div>	<div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>Dyfed Powys Powys Police</div>	<div>Office of Police and Crime Commissioner – Dyfed Powys Police.</div> <div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div>	<div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>Dyfed Powys Powys Police</div>	<div>Office of Police and Crime Commissioner – Dyfed Powys Police.</div> <div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div>	<div>Pembrokeshire County Council (Inclusive of Pembrokeshire Youth)</div> <div>Pobl Housing Association</div> <div>Powys County Council (Inclusive of Powys Youth Justice Team)</div> <div>Powys Teaching Health Board</div> <div>The Wallich</div> <div>The Welsh Ambulance Service</div> <div>Wales and West Housing Association</div> <div>Dyfed Powys Powys Police</div>
4	How is information shared and what methods are used to keep the	<div>Information will be shared via Dyfed-Powys Police ASB Dashboard (internal system on DPP intranet) via Office 365 to the recipient.</div> <div>Verbal Information shared will be recorded accurately in Niche RMS</div>	<div>Information will be shared via Dyfed-Powys Police ASB Dashboard (internal system on DPP intranet) via Office 365 to the recipient.</div> <div>Verbal Information shared will be recorded accurately in Niche RMS</div>	<div>Information will be shared via Dyfed-Powys Police ASB Dashboard (internal system on DPP intranet) via Office 365 to the recipient.</div> <div>Verbal Information shared will be recorded accurately in Niche RMS</div>	<div>Information will be shared via Office 365 to the recipient.</div> <div>Verbal Information shared will be recorded accurately in Niche RMS</div>		

	<b>information secure?</b>  <i>Provide, in detail the specific agreed secure methods for sharing personal information</i>	<p>Axon citizen – secure submission of photographs and CCTV to police account from partners and community.</p> <p>Encrypted USB sticks and computers to be used by police and partners where there is occasion to utilise sticks or move computers around.</p> <p>Information shared verbally must be completed in private so that 3<sup>rd</sup> parties cannot overhear.</p> <p>Secure email systems are to be utilised</p> <p>Organisations subject to this ISP must share data securely via Transport Layer Security (TLS) system e-mail, version 1.2 and higher as secure for transfer of personal/sensitive information. Partners will apply encryption and attachment measures in line with organisational policy.</p>	<p>Axon citizen – secure submission of photographs and CCTV to police account from partners and community.</p> <p>Encrypted USB sticks and computers to be used by police and partners where there is occasion to utilise sticks or move computers around.</p> <p>Information shared verbally must be completed in private so that 3<sup>rd</sup> parties cannot overhear.</p> <p>Secure email systems are to be utilised</p> <p>Organisations subject to this ISP must share data securely via Transport Layer Security (TLS) system e-mail, version 1.2 and higher as secure for transfer of personal/sensitive information. Partners will apply encryption and attachment measures in line with organisational policy.</p>	
5	<b>Reliance on consent</b>  <i>Check the box if any exchange relies on consent and explain how and when consent is obtained. Ensure section 4 of the ISP reflects this legal basis</i>	<p><input checked="" type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>This information sharing agreement refers to situations where information is shared with the express consent of the subject or where there is a lawful requirement to so for example under the requirements of the Crime and Disorder Act 1998 or the Anti-Social Behaviour Crime and Policing Act</p>	<p><input checked="" type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>This information sharing agreement refers to situations where information is shared with the express consent of the subject or where there is a lawful requirement to so for example under the requirements of the Crime and Disorder Act 1998 or the Anti-Social Behaviour Crime and Policing Act</p>	<p><input checked="" type="checkbox"/> Exchange relies on consent</p> <p><input checked="" type="checkbox"/> Exchange does not rely on consent</p> <p>This information sharing agreement refers to situations where information is shared with the express consent of the subject or where there is a lawful requirement to so for example under the requirements of the Crime and Disorder Act 1998 or the Anti-Social Behaviour Crime and Policing Act</p>

		2014, Mental Capacity Act 2005 or The Children's Act 1989. This is to be recorded.	2014, Mental Capacity Act 2005 or The Children's Act 1989. This is to be recorded.	2014, Mental Capacity Act 2005 or The Children's Act 1989. This is to be recorded.
6	Notes for Practitioners			

## 10 **Appendix C – Partner Organisations Signatures**

This section should only be completed once the ISP has been assured by a Quality Assurance group. Further information on the ISP development process can be found on the WASPI Website.

By signing below, partner organisations are confirming they agree with the content of the ISP. In the context of sharing personal information, signing the ISP is one way to demonstrate accountability with the principles set out in Article 5 of UK GDPR.

The signatory will be an appropriate person with authority to sign the ISP on behalf of the organisation. The ISP lead has responsibility for obtaining signatures to the ISP.

Partner Organisation	Ateb Housing Association
Name	
Position	
Date	
Signature	

Partner Organisation	Barcud Housing Association
Name	

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<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Bro Myrddin Housing Association
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Caredig Housing
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Carmarthenshire County Council
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

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<b>Signature</b>	
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<b>Partner Organisation</b>	Ceredigion County council
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Clwyd Alyn Housing
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Cymdeithas Gofal / The Care Society
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

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<b>Partner Organisation</b>	Dwr Cymru / Welsh Water
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Dyfed Drug and Alcohol Service - DDAS
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Dyfed Powys Police
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Goleudy Housing Association
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<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Grwyp Cyneifin
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Hafan Cymru
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	H.M Prison and Probation Service Wales
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

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<b>Signature</b>	
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<b>Partner Organisation</b>	Hywel Dda University Health Board
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Kaleidoscope Powys
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Melin Homes
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	



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<b>Partner Organisation</b>	Mid and West Wales Fire and Rescue Service
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Milford Haven Port Authority
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	National Resources Wales
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Newydd Housing
<b>Name</b>	
<b>Position</b>	

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<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Office of Police and Crime Commissioner (OPCC) Dyfed-Powys Police
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Pembrokeshire County Council
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Pobl Housing Association
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

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<b>Signature</b>	
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<b>Partner Organisation</b>	Powys County Council
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Powys Teaching Health Board
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	The Wallich
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	

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<b>Signature</b>	
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<b>Partner Organisation</b>	The Welsh Ambulance Service
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

<b>Partner Organisation</b>	Wales and West Housing Association
<b>Name</b>	
<b>Position</b>	
<b>Date</b>	
<b>Signature</b>	

10.1

[Insert additional tables if required]