

Information Sharing

Guidance for practitioners providing services to children, young people, parents and carers

May 2019

Foreword

What is the guidance for?

The aim of this guidance is to improve practice by giving people working with children and families guidance on when and how they can share information legally and professionally.

Decisions to share information, with whom and when, can have a profound impact on a child's life. Sharing information is vital for early intervention to ensure that children and young people get the services they require. It is also essential to protect children and young people from suffering harm from abuse or neglect and to prevent them from offending.

Who is the guidance for?

This guidance is for practitioners who have to make decisions about sharing personal information on a case-by-case basis, whether they are:

- working in the public, private or voluntary sectors;
- providing services to children, young people and/or families;
- working with adults who are responsible for children who may be at risk or in need.

This includes front-line staff working in health, education, schools, social care, youth work, early years, family support, offending and criminal justice, police, advisory and support services, sport and culture. This guidance is also for managers and advisors who support these practitioners in their decision making and for others with responsibility for information governance.

What this guidance does not cover

This guidance is focused on information sharing in individual cases. It does not deal with subject access requests, bulk transfer of information nor detailed procedures such as the provision of information to the police.

The status of this guidance

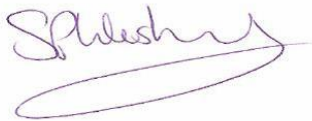
The Islands Safeguarding Children Partnership (ISCP) has an important role in supporting information sharing between and within organisations and addressing any barriers to information sharing. This includes ensuring that a culture of appropriate handling and sharing of information is developed and supported as necessary through multi-agency training.

This guidance is issued under section 27 of The Children (Guernsey and Alderney) Law, 2008 ('Children Law') and has been updated to reflect the General Data Protection Regulation (GDPR) and Data Protection (Bailiwick of Guernsey) Law, 2017. The guidance is, in large part, based upon the *"Advice for practitioners providing safeguarding services to children, young*

people, parents and carers” issued by H.M Government in the United Kingdom, in July 2018¹ suitably adapted for our local jurisdiction.

Although this guidance should act as a useful tool in achieving lawful good practice, the duty to ensure that information sharing is lawful and proportionate rests with individuals and their employing agencies. Practitioners may need to read this general guidance alongside:

- i. the data protection laws;
- ii. any guidance issued by the Office of the Data Protection Commissioner;
- iii. any guidance or policies issued by their own agency and/or professional body;
- iv. any guidance or information sharing protocol/agreement covering specific types of information exchange (e.g. the Information Sharing Protocol for MARAC).



Simon Westwood, Independent Chair ISCP

May 2019

Statement from the Data Protection Commissioner

I welcome the work being done by the ISCP to support and deliver the highest standards of data governance in the important work that they do. Poor handling of data in this area can lead to significant harms both to individuals and to society. This guidance recognises the essential role data protection legislation plays and aims to ensure practitioners have access to clear and relevant advice and support when making complex and often difficult decisions.

All individuals are entitled to dignity and respect in their interactions with organisations and practitioners are entitled to clarity, information and support when carrying out their duties. Ensuring a robust framework of data protection is a key element of both these areas and I am optimistic that the good work started by the publication of this document will be continued.

Emma Martins
Data Protection Commissioner
Office of the Data Protection Authority

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf

Contents

Foreword.....	2
1. Introduction	5
2. Seven golden rules for information sharing	7
The General Data Protection Regulation (GDPR) and Data Protection (Bailiwick of Guernsey) Law 2017	8
3. The principles.....	11
4. Flowchart of when and how to share information	13
Notes on flowchart	14
Is there a clear and legitimate purpose for sharing information?	14
Does the information enable a living person to be identified?.....	14
Are you sharing information appropriately and securely?.....	14
Being open and honest and keeping people informed	15
Have you properly recorded your information sharing decision?	15
5. Further guidance.....	16
Sharing information between adult and children’s services	16
Sharing information to support transitions	16
Sharing information where there are concerns about harm to a child.....	16
Sharing information where there might be a need for compulsory intervention	16
Sharing information where there are concerns about serious harm to third parties.....	17
Sharing information where you have a statutory duty, court order or notice	17
Sharing information in an emergency situation	18
6. Myth-busting guide.....	19
General information sharing guidance	21
Information specific to children.....	21

1. Introduction

Sharing information is essential to enable early intervention to help children, young people and families who need additional services to achieve positive outcomes. Information sharing is also vital to safeguard and promote the welfare of children and young people.

A key factor in many serious case reviews has been a failure to record information, to share it, to understand the significance of the information shared, and to take appropriate action in relation to known or suspected abuse or neglect.

Practitioners sometimes feel constrained from sharing information by their uncertainty about when they can do so lawfully. This guidance aims to provide clarity on that issue.

Where there are concerns about the safety of a child, the timely and effective sharing of information between organisations can reduce the risk of harm. While the Data Protection Law places duties on organisations and individuals to process personal information fairly and lawfully, it is not a barrier to sharing information where the failure to do so would place a child at risk of harm. Similarly, human rights concerns, such as respecting the right to a private and family life would not prevent sharing where there are real safeguarding concerns.

Skilled practitioners working directly with children, young people and families are in the best position to use their professional judgement about when to share information. This includes judgments about sharing information with colleagues in the same organisation, as well as those working in other organisations, in order to provide effective early help and to keep children safe from harm. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children at risk of abuse or neglect. Every practitioner must take responsibility for sharing the information they hold, and cannot assume that someone else will pass on information, which may be critical to keeping a child safe.

One approach to aid effective information sharing is to use multi-agency forums such as the Multi-Agency Support Hub (MASH). In these settings, the same principles of sharing information apply but it is important that accountability is defined to ensure that teams know who is responsible for making decisions and how information that is shared will be used.

Being alert to signs of abuse and neglect and taking action

All practitioners should be alert to the signs and triggers of child abuse and neglect. Abuse (emotional, physical and sexual) and neglect can present in many different forms. Indicators of abuse and neglect may be difficult to spot. Children may disclose abuse, in which case the decision to share information is clear, as actions must be taken to respond to the disclosure. In other cases, for example, neglect, the indicators may be more subtle and appear over time. In these cases, decisions about what information to share, and when, will be more difficult to judge. Everyone should be aware of the potential for children to be sexually exploited for money, power, or status, and individuals should adopt an open and inquiring mind to what could be underlying reasons for behaviour changes in children of all ages.

If a practitioner has concerns about a child's welfare, or believes they might be at risk of harm, they should share the information with the MASH, police and/or Children's Convenor, in line with [local procedures](#). Security of information sharing must always be considered and should be proportionate to the sensitivity of the information and the circumstances. **If it is thought that a crime has been committed and/or a child is at immediate risk, the police should be contacted without delay.**

2. Seven golden rules for information sharing

- 1 Remember that the GDPR, Data Protection Laws and human rights law are not a barrier to sharing information but provide a framework to ensure that personal information about living persons is handled and shared appropriately.
- 2 Be open and honest with the person (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
- 3 Seek advice if you are in any doubt, without disclosing the identity of the person where possible.
- 4 Consider the possible impact of sharing information alongside individual rights to privacy, and try to work in partnership with people to keep them informed about how their information will be handled and shared, unless it is unsafe or inappropriate to do so.
- 5 Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the person and others who may be affected by their actions.
- 6 Necessary, proportionate, relevant, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those people who need to have it, is accurate and up-to-date, is shared in a timely way, and is shared securely (see principles).
- 7 Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

The General Data Protection Regulation (GDPR) and Data Protection (Bailiwick of Guernsey) Law 2017

The GDPR is a European Union directive and the equivalent Data Protection (Bailiwick of Guernsey) Law 2017 ('Data Protection Law') came into force in the Bailiwick in May 2018 and introduced new elements to the data protection regime, superseding the Data Protection (Bailiwick of Guernsey) Law 2001.

The GDPR and Data Protection Law do not prevent, or limit, the sharing of information for the purposes of keeping children safe. However, practitioners should be confident of the processing conditions and principles which allow them to share personal information.

The *lawfulness of processing* is set out at Section 7 of the Data Protection Law and the conditions for processing are set out at Schedule 2. The law introduces the new concept of Special Category Data ('SCD')². SCD is fairly narrowly defined and refers to particularly sensitive and personal information i.e.:

- (i) personal data revealing an individual's racial or ethnic origin, political opinion, religious or philosophical belief, or trade union membership or
- (ii) genetic data, biometric data, health data, personal data concerning an individual's sex life or sexual orientation, or criminal data.

The conditions you need to satisfy for processing data will depend on whether or not the data is SCD. If it is, you must satisfy at least one condition in Part II or III of Schedule 2. If not, you must be able to satisfy at least one condition in Part I or II of Schedule 2.

Set out below are the conditions most likely to be applicable when considering the sharing of information in the context of providing services to children, young people, parents and carers with some accompanying guidance (in red italics):

Schedule 2, Part I

1. The data subject has requested or given consent to the processing of the personal data for the purpose for which it is processed. *The standard for consent is higher than in the previous law. Consent can no longer be implied. The Data Protection Commissioner advises that public authorities,*

² S.111(1) the Data Protection Law, 2017

*employers and other organisations in a position of power over individuals should **avoid relying on consent** unless they are confident they can demonstrate it is freely given.*

3. The processing is necessary to protect the vital interests of the data subject or any other individual. *“Vital interests” is defined to include “life, health or safety” and “health” includes both physical and mental health. This condition will often be an appropriate basis for the sharing of information in cases of safeguarding.*

5. The processing is necessary for the exercise or performance by a public authority of

(a) a function that is of a public nature, or

(b) a task carried out in the public interest.

This condition may be satisfied when the States (or its agents) is sharing information as part of its duty to (i) provide services to children in need so as to promote their upbringing by the child’s family and to prevent the child becoming a child at risk³ and/or (ii) provide services for any child in the care of the Committee⁴.

6. The processing is necessary for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by law, otherwise than by an enactment or an order or a judgment of a court or tribunal having the force of law in the Bailiwick.

Part II

8. The processing is necessary for the controller to exercise any right or power, or perform or comply with any duty, conferred or imposed on the controller by an enactment. *This condition may be satisfied when the States (or its agents) is sharing information as part of its duty to (i) provide services to children in need so as to promote their upbringing by the child’s family and to prevent the child becoming a child at risk⁵ and/or (ii) provide services for any child in the care of the Committee⁶.*

10. (a) The processing is necessary for a health or social care purpose and is undertaken by –

(i) a health professional, or

(ii) a person who in the circumstances owes a duty of confidentiality which is equivalent to that which would arise if the person were a health professional.

(b) In subparagraph (a) "**health or social care purpose**" includes the provision of medical, health or social care or treatment.

This condition may be satisfied when providing services to children and families.

12. The processing is necessary –

³ S.24 of The Children (Guernsey and Alderney) Law, 2008

⁴ S.26 of The Children (Guernsey and Alderney) Law, 2008

⁵ S.24 of The Children (Guernsey and Alderney) Law, 2008

⁶ S.26 of The Children (Guernsey and Alderney) Law, 2008

- a. for the purpose of, or in connection with –
 - i. any legal proceedings (including prospective legal proceedings), or
 - ii. the discharge of any functions of a court or tribunal acting in its judicial capacity,
- b. for the purpose of obtaining legal advice, or
- c. otherwise for the purposes of establishing, exercising or defending legal rights

This condition may be satisfied when sharing information to support an application to court to safeguard a child or a referral to the Children's Convenor.

13. The processing is necessary for –

- d. the administration of justice, or
- e. the exercise of any function of the Crown, a Law Officer of the Crown, the States or a public committee.

This broad condition may be satisfied when sharing information if it is necessary to carry out a function of a States Committee. Those functions are summarised at <https://www.gov.qg/constitution> and includes e.g. the welfare and protection of children, young people and their families.

Part III

18. The data subject has given explicit consent to the processing of the personal data for the purpose for which it is processed. *Explicit consent requires a very clear and specific statement of consent.*

19. The processing is necessary to protect the vital interests of the data subject or any other individual, and –

- (a) the data subject is physically or legally incapable of giving consent, or
- (b) the controller cannot reasonably be expected to obtain the explicit consent of the data subject.

If processing Special Category Data, additional conditions have to be satisfied if you wish to rely upon the "vital interests" condition (reflecting the particularly sensitive nature of that data). If it is not SCD you can rely on condition 3.

3. The principles

The principles set out below are intended to help practitioners share information between organisations. The GDPR and Data Protection Law place duties on organisations and individuals to share information fairly and lawfully; they are not a barrier to sharing information where the failure to do so would cause the safety or wellbeing of a child to be compromised. Practitioners should use their judgment when making decisions on what information to share and when, and should follow organisational procedures or consult with their manager if in doubt.

The most important consideration is whether sharing information is likely to safeguard and protect a child.

Necessary and proportionate

When taking decisions about what information to share, you should consider how much information you need to release. Not sharing more data than is necessary to be of use is an important part of GDPR and Data Protection Law and you should consider the impact of disclosing information on the subject and any third parties. Any information shared must be proportionate to the need and level of risk. In deciding proportionality regard should be had to the proportionality factors set out in the law⁷.

Relevant

Only information that is relevant to the purposes should be shared with those who need it. This allows others to do their job effectively and make informed decisions.

Adequate

Information should be adequate for its purpose. Information should be of the right quality to ensure that it can be understood and relied upon.

Accurate

Information should be accurate and up to date and should clearly distinguish between fact and opinion. If the information is historical then this should be explained.

Timely

Information should be shared in a timely way to reduce the risk of harm. Timeliness is vital in emergency situations and it may not be appropriate to inform data subjects about information sharing if it could cause delays and therefore harm to a child. Practitioners should ensure that sufficient information is shared, as well as consider the urgency with which to share it.

Secure

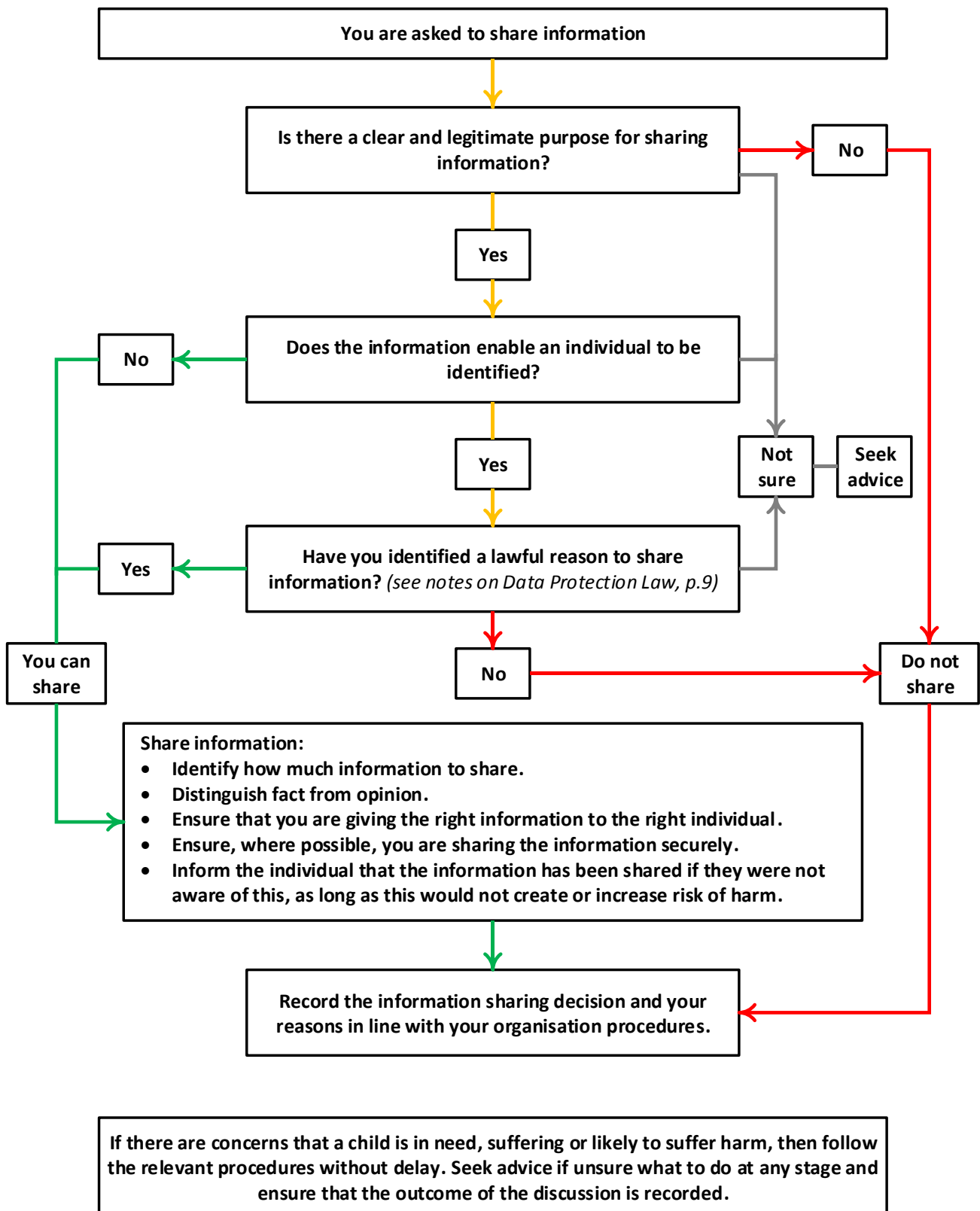
Wherever possible, information should be shared in an appropriate, secure way. Practitioners must always follow their organisation's policy on security for handling personal information.

⁷ At schedule 9, paragraph 4

Record

Information sharing decisions should be recorded whether or not the decision is taken to share. If the decision is to share, the reasons should be recorded including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, it is good practice to record the reasons for this decision and discuss them with the requester. In line with each organisation's retention policy, the information should not be kept any longer than is necessary. In some circumstances this may be indefinitely, but if this is the case there should be a review process.

4. Flowchart of when and how to share information



Notes on flowchart

Is there a clear and legitimate purpose for sharing information?

Any sharing of information must comply with the law relating to confidentiality, data protection and human rights. Establishing a legitimate purpose for sharing information is an important part of meeting those requirements.

Previously, consent had been considered the preferred basis for sharing information. However, consent issues can be complex and changes to data protection law in 2018 set a higher standard for consent as a condition for processing data - consent can no longer be implied and when the law requires explicit consent it must be a very clear and specific statement of consent. The Data Protection Commissioner now advises that public authorities, employers and other organisations in a position of power over individuals should **avoid relying on consent** unless they are confident they can demonstrate it is freely given.

It is important to note that consent is only one lawful basis for sharing information (processing) and there are alternatives (e.g. to protect an individual's vital interests). You should carefully consider which condition is most appropriate for you to rely on.

The Office of the Data Protection Commissioner has issued useful guidance at: <https://odpa.gg/wp-content/uploads/2018/06/Consent.pdf>.

Individual agencies may have developed specific guidelines and processes for sharing information. You will need to be guided by your agency's policies and procedures and – where applicable – by your professional code.

Does the information enable a living person to be identified?

In most cases the information covered by this guidance will be about an identifiable living individual. If the information is suitably anonymised, it can be shared. However, if the information is about an identifiable individual or could enable a living person to be identified when considered with other information, it is personal information and is subject to data protection and other laws.

Are you sharing information appropriately and securely?

If you decide to share information, you should share it in a proper and timely way, act in accordance with the principles of the Data Protection Law and follow your organisation's policy and procedures. In relation to sharing information at the frontline, you will need to ensure that you:

- share only the information necessary for the purpose for which it is being shared;
- distinguish clearly between fact and opinion;
- share the information only with the person or people who need to know;

- check that the information is accurate and up-to-date;
- share it in a secure way, for example, confirm the identity of the person you are talking to; ensure that a conversation or phone call cannot be overheard; use secure email;
- establish with the recipient whether they intend to pass it on to other people, and the lawful basis for doing so.

In deciding what information to share, you also need to consider the safety of other parties, such as yourself, other practitioners and members of the public. If the information you want to share allows another party to be identified, for example, from details in the information itself or as the only possible source of the information, you need to consider if sharing the information would be reasonable in all circumstances. Could your purpose be met by only sharing information that would not put that person's safety at risk?

Being open and honest and keeping people informed

If your decision is to share information, you should inform the person to whom the information relates and, if different, any other person who provided the information, if you have not done so already and it is safe to do so.

There will be some circumstances where you should not inform the individual that the information will be shared. For example, if doing so would:

- place a person (the individual, family member, yourself or a third party) at increased risk of serious harm or
- prejudice the prevention, detection or prosecution of a serious crime; or
- lead to an unjustified delay in making enquiries about allegations of serious harm to a child.

Have you properly recorded your information sharing decision?

You should record your decision and the reasons for it, whether or not you decide to share information. If the decision is to share, you should record what information was shared and with whom.

5. Further guidance

Sharing information between adult and children's services

Practitioners in adult services must keep in mind that problems faced by clients who have parenting responsibilities are often likely to affect children and other family members. However this information is not always shared and opportunities to put preventative support in place for the children and family are missed. Where an adult receiving services is a parent or carer, sharing information where appropriate with colleagues in children's services could ensure that any additional support required for their children can be provided early and/or protect them from harm.

Sharing information to support transitions

There are many transition points in the life of a child. Transitions include a child moving from nursery into primary school; from primary to secondary school; and moving into adulthood. Significant transitions can also occur when an individual leaves long-term care. In all of these cases, information sharing is important to ensure that the child and his family get the support that they require, through and after the transition.

Sharing information where there are concerns about harm to a child

It is critical that where you have reasonable cause to believe that a child or young person may be suffering or may be at risk of suffering harm, you should always consider referring your concerns to the MASH or the police, in line with the Islands Safeguarding Children Partnership (ISCP) procedures.

In some situations there may be a concern that a child may be suffering, or at risk of suffering harm, or of causing harm to another child or harm to an adult. In these situations, the concern must not be ignored. You should always talk to someone to help you decide what to do – a lead person on child protection, a Caldicott guardian, your manager, an experienced and trusted colleague or another practitioner who knows the person. Harm to children can arise from a number of circumstances – it is not restricted to cases of deliberate abuse or gross neglect. For example a baby who is failing to thrive for no known reason could be suffering serious harm but equally could have an undiagnosed medical condition. If the parents refuse consent for further medical investigation or an assessment, then you may still be justified in sharing information. In this case, the information sharing would be to protect the child's vital interests by ensuring that the causes of the failure to thrive are correctly identified.

Sharing information where there might be a need for compulsory intervention

In addition to referring to MASH when a child might be in need or at risk, any person (who believes that compulsory intervention may be necessary to ensure the provision of adequate care, protection, guidance or control for a child) may refer the matter to the [Children's Convenor](#).

Sharing information where there are concerns about serious harm to third parties

Where you have concerns that the actions of some may place children at risk of harm, it may be possible to justify sharing information with or without consent for the purposes of identifying people for whom preventative interventions are appropriate.

Sharing information where you have a statutory duty, court order or notice

In some situations you are required by law to share information. Section 27 of The Children Law places a duty on those working with children in need or at risk, to share information and work together. The sharing of information will be lawful provided that the employee acts;

- i. in good faith
- ii. in accordance with the Children Law, and
- iii. in accordance with any regulations or guidance.

This guidance is issued under section 27 of the Children Law and should be complied with.

Section 38 of The Children Law places a duty on those who receive a written notice to disclose to the Children's Convenor, all information they hold in relation to the matter identified in the notice, for the purposes of an investigation being carried out. A time period in which to achieve this will be specified in the notice. Section 38 provides that the duty to disclose information on receipt of a notice overrides any duty of confidentiality to which the person receiving the notice may be subject.

In such situations you should usually share the information, even if it is confidential and consent has not been given. Wherever possible, you should inform the individual concerned that you are sharing the information, why, and with whom.

There may be some exceptional and limited circumstances when you receive a notice from the Convenor under Section 38 but are of the view that it is not necessarily appropriate to comply with that notice. In such cases you should consider;

- discussing the matter with a senior manager
- taking advice from your professional body
- taking legal advice
- discussing your concerns with the Convenor

Ultimately you or your agency may come to the conclusion that it is exceptionally not appropriate to comply with the notice. In such circumstances it would be good practice to discuss the reasons for that decision with the Convenor at the earliest opportunity. The Convenor may decide to withdraw the notice or re-issue the notice in different terms (e.g. narrowing the extent of the information requested). If the matter cannot be resolved with the Convenor, the Convenor may decide to apply to Court for a disclosure order to determine the issue. You and/or your agency will have the opportunity to set out the reasons you do not wish to disclose the information and if the court is satisfied that there

are “special circumstances” overriding the duty in section 38 it may decide not to grant the order.

A court may also make an order for certain information or case files to be brought before the court. These situations are relatively unusual. The court order will require you to share the information, even if it is confidential and consent has not been given, unless in the case of a court order or notice, your organisation is prepared to challenge it (e.g. because you are of the view that to share the information may place an individual at risk of serious harm) .

Sharing information in an emergency situation

Whilst the principles underpinning the sharing of information are broadly the same in an emergency situation any delay in sharing information might delay action to safeguard a child from suffering serious harm. Timeliness is a key consideration in emergency situations. It may not be appropriate to seek consent for information sharing if delays could incur as a result.

6. Myth-busting guide

Sharing information between practitioners and organisations is essential for effective identification, assessment, risk management and service provision. Fears about sharing information cannot be allowed to stand in the way of the need to safeguard and promote the welfare of children and young people at risk of abuse or neglect. Below are common myths that can act as a barrier to sharing information effectively:

The GDPR and Data Protection (Bailiwick of Guernsey) Law 2017 are barriers to sharing information

No – the GDPR and Data Protection Law do not prohibit the collection and sharing of personal information. They provide a framework to ensure that personal information is shared appropriately. The Law balances the rights of the information subject (the individual whom the information is about) and the possible need to share information about them. Never assume sharing is prohibited – it is essential to consider this balance in every case.

Consent is always needed to share personal information

No – consent is only one lawful basis for sharing information and there may be more relevant alternatives for safeguarding children (e.g. to protect an individual's vital interests). For consent to be used as a lawful basis to share information it must be unambiguous, freely given and may be withdrawn at any time.

Wherever possible you should be open and honest with the individual at the outset about why, what, how and with whom, their information will be shared. There is an important distinction between informing somebody about sharing information (good practice) and seeking their consent to share (establishing a condition for processing).

Personal information collected by one organisation cannot be disclosed to another organisation

No – this is not the case, unless the information disclosed is to be used for a purpose incompatible with the purpose that it was originally collected for. In the case of children in need or at risk of serious harm, it is difficult to foresee circumstances where information law would be a barrier to sharing information with other practitioners.

The customary law duty of confidence and the Human Rights (Bailiwick of Guernsey) Law, 2000 prevent the sharing of personal information

No – this is not the case. In addition to the GDPR and Data Protection Law, practitioners need to balance the customary law duty of confidence and the rights of individuals within the Human Rights (Bailiwick of Guernsey) Law, 2000 against the effect on individuals of not sharing the information.

Practitioners must consider this on a case-by-case basis. As is the case for all information processing, initial thought needs to be given as to whether the objective can be achieved by limiting the amount of information shared – does all of the personal information need to be shared to achieve the objective?

IT Systems are often a barrier to effective information sharing

No – IT systems can be useful in supporting information sharing. IT systems are most valuable when practitioners use the data that has been shared to make more informed decisions about how to support and safeguard a child. Evidence from the Munro Review is clear that IT systems will not be fully effective unless individuals from organisations cooperate around meeting the needs of the individual child. Professional judgment is the most essential aspect of multi-agency work, which could be put at risk if organisations rely too heavily on IT systems.

Appendix 1: Sources of further information

General information sharing guidance

Some of the sources below refer to guidance from the UK Government or from professional bodies based outside Guernsey & Alderney. Although many of the general legal principles and good practice apply in Guernsey and Alderney, you may need to take advice in relation to an individual query. Practitioners working for The States of Guernsey have access to specialist advisers in its Data Protection Team. Further information and contact details can be found at: <http://bridge/dataprotection/default.aspx>

The Data Protection (Bailiwick of Guernsey) Law, 2017. Available at: <http://www.guernseylegalresources.gg/CHttpHandler.ashx?id=113397&p=0>

Office of the Data Protection Authority (website): <https://odpa.gg/>
Office of the Data Protection Authority (guidance): <https://odpa.gg/new-law/>

Information Commissioner's Office (UK guidance): <https://ico.org.uk/for-organisations/guidance-index/data-protection-and-privacy-and-electronic-communications/>.

Confidentiality: NHS Code of Practice (DH, 2003): <https://www.gov.uk/government/publications/confidentiality-nhs-code-of-practice>.

Confidentiality: good practice in handling patient information (GMC, 2017): https://www.gmc-uk.org/guidance/ethical_guidance/confidentiality.asp.

BMA Confidentiality and health records toolkit: <https://www.bma.org.uk/advice/employment/ethics/confidentiality-and-health-records>

The Code: Professional standards of practice and behavior for nurses and midwives (NMC, 2015): <https://www.nmc.org.uk/globalassets/sitedocuments/nmc-publications/nmc-code.pdf>.

HCPC standards of conduct, performance and ethics (HCPC, 2016): <https://www.hcpc-uk.org/standards/standards-of-conduct-performance-and-ethics/>.

Multi-agency public protection arrangements (MAPPA) U.K. guidance (2012): <https://www.gov.uk/government/publications/multi-agency-public-protection-arrangements-mappa--2>.

Multi-agency risk assessment conference (MARAC) resources: <http://www.safelives.org.uk/practice-support/resources-marac-meetings>.

Information specific to children

Islands Safeguarding Children Partnership child protection procedures: <http://iscp.gg/>.

Appendix 1: Sources of further information

Working Together to Safeguard Children (UK - D of E, 2018):

<https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>.

Protecting children and young people: the responsibilities of all doctors (GMC, 2012):

<https://www.gmc-uk.org/ethical-guidance/ethical-guidance-for-doctors/protecting-children-and-young-people>.

Available to download at: <http://iscp.gg/Information-Sharing>