

INFORMATION SHARING PROTOCOL Neuro Gateway Support Network

1. Introduction and Statement of Commitment

Neuro Gateway Support Network is committed to ensuring that information is handled and shared in a manner that is lawful, ethical, proportionate, and consistent with the rights and wellbeing of individuals. The organisation recognises that those who access its services often share highly sensitive and personal information relating to health conditions, care arrangements, family circumstances, and safeguarding concerns.

Effective information sharing is essential to the organisation's ability to provide meaningful support. It enables individuals to be guided appropriately, facilitates access to services, and supports the identification and management of risk. At the same time, the organisation recognises that individuals have a fundamental right to privacy and that information must only be shared where justified and necessary.

This protocol establishes a clear framework for the sharing of information within *Neuro Gateway Support Network*. It ensures that all decisions relating to information sharing are made consistently, transparently, and in accordance with legal and professional standards.

2. Legal and Regulatory Framework

This protocol operates within the framework of relevant legislation and guidance governing confidentiality, data protection, and safeguarding within the United Kingdom and Wales.

In particular, it aligns with the UK General Data Protection Regulation and the Data Protection Act 2018, which set out the principles for lawful processing of personal data. It also reflects the requirements of the Human Rights Act 1998, specifically Article 8, which protects the right to private and family life.

The organisation also operates in accordance with the Social Services and Well-being (Wales) Act 2014 and the Wales Safeguarding Procedures, which emphasise the importance of sharing information appropriately to protect individuals from harm.

In addition, the organisation recognises the relevance of the Caldicott Principles, which provide guidance on the appropriate use and sharing of personal information in health and social care contexts. These principles emphasise the need for justification, necessity, and proportionality in information sharing.

3. Scope and Application

This protocol applies to all individuals acting on behalf of *Neuro Gateway Support Network*, including trustees, volunteers, and any individuals involved in service delivery or administrative functions.

It applies to all forms of information, regardless of how that information is received, recorded, or stored. This includes written records, electronic data, emails, verbal disclosures, and any other form of communication.

The protocol applies to both internal information sharing within the organisation and external sharing with third parties, including statutory services, healthcare providers, and other organisations.

The principles outlined in this protocol apply at all times, including after an individual's involvement with the organisation has ended.

4. Purpose and Importance of Information Sharing

The organisation recognises that information sharing plays a critical role in supporting individuals and promoting their wellbeing. Appropriate sharing of information enables individuals to access the right services, supports informed decision-making, and helps to identify and manage risks.

At the same time, inappropriate or unnecessary sharing of information can cause harm, undermine trust, and breach legal obligations. It is therefore essential that all information sharing is carefully considered and justified.

The purpose of this protocol is to ensure that information is shared only where necessary and appropriate, and that such sharing is carried out in a manner that respects both the rights of individuals and the responsibilities of the organisation.

5. Principles of Information Sharing

Neuro Gateway Support Network adheres to a number of core principles when sharing information.

Information will only be shared where there is a clear and legitimate purpose. The organisation will ensure that the information shared is relevant to that purpose and that only the minimum amount of information necessary is disclosed.

Information sharing must be lawful. The organisation will ensure that there is a valid legal basis for sharing information, whether this is based on consent, legal obligation, safeguarding necessity, or legitimate interest.

Wherever possible, information sharing will be based on the informed consent of the individual. Individuals will be provided with clear information about how their data may be used and shared.

All information will be handled securely, and appropriate measures will be taken to protect it from unauthorised access or misuse.

The organisation is committed to transparency and will ensure that individuals are aware of how their information is used, including any circumstances in which it may be shared without consent.

6. Consent and Individual Rights

The organisation recognises the importance of obtaining consent when sharing information. Consent must be informed, meaning that the individual understands what information will be shared, why it is being shared, and with whom it will be shared.

Consent must be freely given and must not be obtained through coercion or undue pressure. Individuals have the right to refuse consent and to withdraw consent at any time.

Where consent is obtained, it must be clearly recorded. The organisation will respect the wishes of individuals where possible, while also recognising that there may be circumstances in which information must be shared without consent.

The organisation is committed to respecting the rights of individuals under data protection legislation, including the right to access their data, the right to rectification, and the right to restrict processing in certain circumstances.

7. Sharing Information Without Consent

Neuro Gateway Support Network recognises that there are circumstances in which information must be shared without the consent of the individual.

This may include situations where there is a risk of harm to the individual or others, where safeguarding concerns are identified, or where there is a legal obligation to share information. In such cases, the organisation will ensure that the decision to share information is justified, proportionate, and based on a clear understanding of the risks involved. Only the information necessary to address the situation will be shared.

Where it is safe and appropriate to do so, the individual will be informed that information has been shared. However, this may not be possible in situations where doing so would increase the risk of harm.

8. Safeguarding and Information Sharing

Safeguarding is a key context in which information sharing may be necessary. Where there is a concern that an individual may be at risk of abuse, neglect, or harm, the organisation has a duty to act.

Information may be shared with relevant statutory authorities, including local safeguarding teams, health services, or emergency services, in order to protect individuals. This may occur without consent where necessary.

Safeguarding considerations take precedence over confidentiality where there is a risk to safety or wellbeing. All safeguarding-related information sharing must be carried out in accordance with the organisation's Safeguarding Policy.

9. Decision-Making Process

When considering whether to share information, individuals must follow a structured and considered process.

This includes identifying the purpose of sharing, assessing whether the information is necessary, determining whether consent has been obtained or can be obtained, and identifying the legal basis for sharing.

The potential risks and benefits of sharing must be carefully weighed. The organisation will prioritise the safety and wellbeing of individuals while also respecting their rights to privacy. All decisions must be documented clearly, including the rationale for sharing or not sharing information.

10. Information Security and Safe Sharing Practices

The organisation is committed to ensuring that all information is shared securely. Appropriate measures must be taken to protect information during transmission and storage.

This includes using secure communication methods, verifying the identity of recipients, and ensuring that information is not shared through unsecured channels. Care must be taken to ensure that information is sent to the correct recipient and that only authorised individuals have access.

The organisation recognises that maintaining information security is essential to protecting confidentiality and maintaining trust.

11. Record Keeping and Documentation

All information sharing decisions must be recorded accurately. Records should include details of what information was shared, the purpose of sharing, the individuals or organisations involved, whether consent was obtained, and the legal basis for sharing.

Records must be clear, factual, and proportionate, and must be stored securely in accordance with the organisation's Data Protection Policy.

Accurate record keeping is essential for accountability, transparency, and compliance.

12. Responsibilities and Accountability

All individuals acting on behalf of *Neuro Gateway Support Network* are responsible for ensuring that information is shared appropriately and in accordance with this protocol.

Trustees have overall responsibility for ensuring that the organisation complies with legal and regulatory requirements. They are responsible for ensuring that appropriate systems and processes are in place to support effective information sharing.

A designated lead may be responsible for overseeing information sharing practices and providing guidance to others within the organisation.

13. Training and Awareness

The organisation is committed to ensuring that individuals understand the principles and requirements of information sharing. All individuals will be expected to familiarise themselves with this protocol and to apply its principles in their work.

Where necessary, additional guidance or support will be provided to ensure that individuals are confident in making decisions about information sharing.

14. Monitoring and Review

The organisation will monitor its information sharing practices to ensure that they remain effective and compliant. This may include reviewing case records, incident reports, and feedback from individuals accessing the service.

This protocol will be reviewed annually, or sooner if required, to ensure that it remains aligned with current legislation, guidance, and best practice.

15. Relationship with Other Policies

This protocol should be read in conjunction with the organisation's Data Protection Policy, Confidentiality Policy, Safeguarding Policy, and Incident Reporting Policy. Together, these policies provide a comprehensive framework for managing information responsibly.

16. Final Statement

Neuro Gateway Support Network is committed to ensuring that information is shared responsibly, lawfully, and in a manner that protects the rights and wellbeing of individuals. The organisation recognises that appropriate information sharing is essential to safeguarding, effective support, and good governance.

By adhering to this protocol, the organisation aims to maintain the trust of those it supports while ensuring that information is used in a way that promotes safety, dignity, and effective service delivery.