

# INFORMATION SHARING AGREEMENT

# **BETWEEN**

NORFOLK CONSTABULARY,
NORFOLK COUNTY COUNCIL,
NORFOLK SCHOOLS,
ACADEMIES, AND COLLEGES
UNDER OPERATION
ENCOMPASS

## **Summary Sheet**

| ISA Reference     | ISA-003453-18   |
|-------------------|---|
| Purpose           | Operation Encompass is a multi-agency approach to give early notification to schools, academies and colleges that a child or young person has been present, witnessed or been involved in a domestic abuse incident. Nominated key adults within local schools will receive information from Norfolk Constabulary to afford them the opportunity of assessing the needs of the child during the school day and, should it be deemed appropriate to do so, to provide early support. |
| Partners          | Norfolk Constabulary Norfolk County Council Norfolk Schools, Academies and Colleges   |
| Date Of Agreement | June 2016 (Amended to comply with GDPR/ Data Protection Act 2018 – March 2019)  |
| Review Date       | August 2019   |
| ISA Owner         | Superintendent Safeguarding   |
| ISA Author        | Information Sharing Officer (updated by Data Protection Reform Team, March 2019)  |

#### **Consultation Record**

| Reviewer                                      | Date of Approval |
|---|------------------|
| Data Protection Officer                       |                  |
| Head of Department owning the ISA             |                  |
| Any Other Internal Stakeholders               |                  |
| External Stakeholders                         |                  |
| Information Security Manager (where relevant) |                  |
| Information Asset Owner (s)                   |                  |

#### **Version Control**

| Version No. | Date Amendments Made | Authorisation |
|-------------|----------------------|---------------|
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#### OFFICIAL

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#### 1. Introduction

For Parties to provide the most efficient and effective public services, it is often necessary to share appropriate and relevant personal information between organisations. Conversely, the concept of sharing public information can also raise public fear, anxiety and concerns over privacy invasion, which can lower trust and confidence in the police service and its partners and associated organisations.

The aim of this Information Sharing Agreement is to facilitate information sharing between Norfolk Constabulary, Norfolk County Council, Norfolk Schools, Academies and Colleges under Operation Encompass, to work together to improve public services within a framework of secure data handling measures and standards, which retain trust and confidence.

Operation Encompass is an initiative between Norfolk Police and local schools, academies and colleges to share domestic abuse (DA) information with nominated key adults where it is identified that a child was present, witnessed or was involved in such an incident. The sharing of this information will allow key adults to carry out an assessment of the needs of that child during the school day to determine what, if any, early intervention support is required to be put in place. The support that may be provided by the key adult can be overt or silent.

Throughout this Agreement, the term 'School' will be used generically as representing all schools, academies and colleges in Norfolk, a list can be found in Appendix E.

Parents, teachers, governors of schools and local councillors will be made aware of the implementation of Operation Encompass.

This Agreement is supported by the Operation Encompass Norfolk Joint Agency Protocol for Domestic Abuse – Notifications to Schools, Version 4.0.

This Agreement constitutes the entire agreement and understanding between the parties in respect of information passed under this Agreement and supersedes all previous agreements, understandings and undertakings in such respect.

#### 2. Partners to the Agreement

The Partners to this agreement are:

- 1) Norfolk Constabulary (the Constabulary)
- 2) Norfolk County Council (the Council)
- 3) The Schools listed in Appendix E

#### 3. Purpose

The purpose of this Agreement is to enable routine and effective information sharing between the Parties and to facilitate the lawful exchange of information in order to comply with the statutory duty on Chief Police Officers to safeguard children.

It sets out a multi-agency procedure to identify and provide appropriate early intervention support to a child who was present, witnessed or was involved in a DA incident.

The sharing of DA information between Norfolk Police and the Council (who will share with the Schools) will allow the School's nominated key adult to respond, if it is appropriate to do so, to the immediate needs of a child. The support that can be provided to address the emotional, health and well-being of the child can be overt or silent but is dependent upon the circumstances surrounding each incident.

The responsibility for providing support, or not as the case may be, will be down to the nominated key adult.

It is hoped, through the sharing of information between agencies and providing early Intervention support to a child as described above, Operation Encompass will reduce the impact of living with DA, which can result in anxiety, depression, aggression and post-traumatic stress disorder (PTSD).

Operation Encompass will enable DA to become an issue that can be discussed in schools and will not be seen as a 'taboo' subject. In other parts of the United Kingdom where Operation Encompass has already been implemented, parents are acknowledging the impact such abuse has on their children and have been prepared to talk to teachers about it.

The Agreement will be used to assist in ensuring that:

- Information is shared in a secure, confidential manner.
- Information is shared only on a 'need to know' basis.
- There are clear procedures to be followed with regard to information sharing.
- Information will only be used for the reason(s) it has been obtained.

#### 4. Lawful Basis

This Agreement has been prepared with the obligations of the statutory guidance, the "Management of Police Information" (MoPI) in mind. The College of Policing Authorised Professional Practice (APP) Information Management, "MoPI sharing" provides standards that must be applied by the Chief Constable of Norfolk Constabulary when sharing information with external agencies. This Information Sharing Agreement (ISA) is compliant with such standards.

It is the responsibility of each Party to ensure that any processing of personal information owned by that Party is carried out in accordance with the requirements and principles of relevant legislation, including the General Data Protection Regulation (GDPR), the Data Protection 2018, the common law duty of confidentiality and the Human Rights Act 1998.

Personal data shall be processed fairly and lawfully, in a transparent manner, and in particular, shall not be processed unless at least one of the lawful bases for processing exists under Article 6 of the GDPR.

For the purposes of this Agreement the relevant condition is Article 6(e) necessary for the performance of a task carried out in the public interest. The public tasks are:

• Section 10 of the Children Act 2004 (the CA) - the duty to promote co-operation between the Parties with a view to improving the well-being of children in Norfolk and;

• Section 11(2) of the CA – the duty to ensure that the Parties' functions are discharged having regard to the need to safeguard and promote the welfare of children.

Special category personal data (SCPD) (i.e. racial/ethnic origin, political opinion, religious beliefs, trade union membership, genetics, biometrics, physical/mental health, sexual life or sexual orientation) shall be processed fairly and lawfully, in a transparent manner, and in particular, shall not be processed unless at least one of the lawful bases for processing exists under Article 6 of the GDPR and a condition under Article 9 is met.

For the purposes of this Agreement the relevant condition under Article 9 is Article 9(2)(g) – necessary for reasons of substantial public interest and, as required under the Data Protection Act 2018 (the DPA) as follows:

#### For the Council:

• For exercise of a function conferred by enactment and necessary for reasons of substantial public interest under Schedule 1, Part 2, Paragraph 6 of the DPA. The relevant statute is Section 10 and Section 11(2) of the CA

#### For the Constabulary:

- For the purposes of a function conferred on a person by an enactment or rule of law under Schedule 1, Part 2, Paragraph 6 of the DPA.
- Necessary for the purposes of protecting the physical, mental or emotional wellbeing
  of an individual under the age of 18 under Schedule 1, Part 2, Paragraph 18 of the
  DPA.

#### For Schools:

 For exercise of a function conferred by enactment and necessary for reasons of substantial public interest under Schedule 1, Part 2, Paragraph 6 of the DPA. The relevant statute is Section 10 and Section 11(2) of the CA, Section 175 Education Act 2002

Personal data relating to criminal convictions and offences or related security measures shall be processed fairly and lawfully, in a transparent manner, and in particular, shall not be processed unless at least one of the lawful bases for processing exists under Article 6 and a separate condition for processing special category data under Article 9 is met, and it shall be carried out only under the control of official authority.

#### For the Council:

• The processing meets the requirement in Article 10 of the GDPR for authorisation by the law of the United Kingdom as it is in accordance with section 10(5) of the DPA in that the processing meets the condition in Schedule 1, Part 2, Paragraph 6(1) and 6(2) of DPA i.e. necessary for exercise of a function conferred by an enactment or rule of law as set out in section 10 and 11 of the CA and necessary for reasons of substantial public interest

#### For the Constabulary:

 The processing meets the requirement of Article 10 of the GDPR for authorisation by law of the United Kingdom as it is in accordance with Section 10(5) of the DPA in that the processing meets the condition in Schedule 1, Part 2, Paragraph 18 and 6 of the DPA i.e. Safeguarding children at risk and for the purposes of a function conferred on a person by an enactment or rule of law

#### For Schools:

• The processing meets the requirement in Article 10 of the GDPR for authorisation by the law of the United Kingdom as it is in accordance with section 10(5) of the DPA in that the processing meets the condition in Schedule 1, Part 2, Paragraph 6(1) and 6(2) of DPA i.e. necessary for exercise of a function conferred by an enactment or rule of law as set out in section 10 and 11 of the CA, Section 175 of the Education Act and is necessary for reasons of substantial public interest.

The sharing of information under this Agreement will be compliant with the European Convention of Human Rights and the Human Rights Act 1998, in particular Article 8 which states that:

'Everyone has the right to respect for his private and family life, his home and his correspondence'.

There shall be no interference by a public authority with the exercise of this right except such as is in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

This Agreement takes into account the Common Law duty of confidentiality which applies where information has a necessary quality of confidence or where information is imparted in circumstances giving rise to an obligation of confidence that is either explicit or implied. Where the duty applies, disclosure will be justified through consent, legal duty, and the public interest or for the safeguarding of one or more people.

The following highlights relevant legislation and how information sharing for the purpose of Operation Encompass is viewed in respect of that legislation.

#### 4.1 List of relevant statutory powers for Information Sharing

This agreement takes into account the following legislation and/or common law:

- Sections 10 and 11 (2) of the Children Act 2004;
- Common Law
- Education Act 2002

See http://www.legislation.gov.uk/ for relevant details of each statutory power.

#### 4.2 Framework legislation relevant to Information Sharing

This agreement takes into account the following framework legislation and/or common law:

- The General Data Protection Regulation (GDPR) and the Data Protection Act 2018
- The Human Rights Act 1998
- Common Law Duty of Confidence
- The Freedom of Information Act 2000
- Sub Judice Contempt of Court Act 1981

See <a href="http://www.legislation.gov.uk/">http://www.legislation.gov.uk/</a> for relevant details of each framework legislation.

It is recognised that different Parties will need to rely on differing legal basis for information sharing depending on the legal status of that Party.

It is also acknowledged that it is the responsibility of each Party to decide on whether and what information will be shared. However, each Party agrees to the overriding principle that information will be shared for the purpose of Operation Encompass where it is necessary, lawful and proportionate to do so.

Each Party will treat all police data ethically, with integrity, fairness, honesty, respect, accountability, objectivity and transparently in line with the Police Code of Ethics and/ or their organisations policies and procedures.

See<a href="http://www.college.police.uk/What-we-do/Ethics/Ethics-home/Pages/Code-of-Ethics.aspx">http://www.college.police.uk/What-we-do/Ethics/Ethics-home/Pages/Code-of-Ethics.aspx</a> for full details of the Police Code of Ethics.

#### 4.3 Fair Processing Notice (FPN)

To meet the GDPR transparency requirements, individuals should be provided with privacy information, as required under Article 13 and 14 of the GDPR including the purpose for processing their personal data, the retention periods for that personal data, and details relating to who the information will be shared with.

Where consent is not sought from the data subject for the processing of their personal data, it should be possible for the data subject to make reference to a Fair Processing Notice owned by the organisation/ agency processing their data. For example Norfolk Constabulary can rely on the Force Information Charter on their website in order to meet the GDPR transparency requirements. The Schools in this Agreement will ensure parents receive a Fair Processing Notice.

#### 4.4 Legitimate Expectation

The sharing of information by the Constabulary must fulfil a policing purpose. A policing purpose is defined under the Management of Police Information (MoPI) Code of Practice as:

- Protecting life and property;
- Preserving order;
- Preventing the commissioning of offences;
- Bringing offenders to justice; and
- Any duty or responsibility of the police arising from common or statute law.

It can be reasonably assumed that the persons from whom information is obtained will legitimately expect that the Constabulary will share it appropriately with any person or party that will assist in fulfilling the policing purposes mentioned above. Reference to the Force Information Charter would also provide them will full details.

#### 4.6 Freedom of Information Act

If a Party receives a request for information under the Freedom of Information Act 2000 ("FOIA") and the Environmental Information Regulations 2004 ("EIR") all parties shall assist and co-operate with the other to enable the other party to comply with its obligations under FOIA and the EIR. This is in line with the requirements laid out in the Lord Chancellor's Code of Practice issued under section 45 of FOIA.

This Code of Practice contains provisions relating to consultation with others who are likely to be affected by the disclosure (or non-disclosure) of the information requested. The code also relates to the process by which one authority may also transfer all or part of a request to another authority if it relates to information they do not hold.

Where a party receives a request for Information in relation to information which it received from another Partner, it shall:-

- (a) contact the other party within 2 working days of receiving a request for Information:
- (b) the originating authority will provide all necessary assistance as reasonably requested by the party to enable the other party to respond to a request for Information within the time for compliance set out in Section 10 of the FOIA or Regulation 5 of the Environmental Information Regulations.

In the interests of transparency, and to assist in meeting the fairness principle, this Agreement and the arrangements it details will be suitable for disclosure for the purposes of the Freedom of Information Act 2000 and so will be published within the Parties' Publication Schemes.

#### 5. Data Protection Impact Assessment

A Data Protection Impact Assessment (DPIA) is a process to identify and minimise data protection risks of a project. Where processing is likely to result in a high risk to individuals a DPIA must be undertaken (a definition of high risk is contained within the DPIA Guide which is available from the Information Management department).

The Parties have completed a DPIA screening checklist in order for an assessment to be made as to whether a DPIA is required in respect of this Agreement.

This Agreement describes the formalisation of a pre-existing and lawful process and presents no additional privacy concerns. Each organisation will determine if a DPIA is required for the purposes of sharing.

#### 6. Information Sharing Process/Procedures

It is recognised that the handling of such confidential, sensitive information needs to be dealt with in a way that is proportionate and appropriate to the needs of the child or young person. To address this, key adults will be identified in each school (a person with child safeguarding training). Where DA information is shared with key adults, the key adult will ensure that any records they have made will then be stored and secured in a similar manner to child safeguarding files.

The key adult will be the person available each day to receive the details of the DA incident and assess the type of support needed for the child. Norfolk Constabulary will hold a database of all key adults in the Norfolk area.

The process for sharing information is set out below and in **Appendix C** and within the Operation Encompass Norfolk Joint Agency Protocol.

The Constabulary will securely email the Children's Advice and Duty Service mailbox, a spreadsheet of the following information every morning:

- the fact that the police were called out in the last 24 hours to a DA incident and a child was present, witnessed or was involved in it (incidents occurring during the weekend, including Friday evening, will also be disclosed on the following Monday);
- the police reference number;
- the time and date of the event;
- circumstances surrounding the incident; this may include data relating to convictions or offences i.e. breach of bail conditions
- the names and dates of birth of any child from that school who was present,
   witnessed or was involved in the DA incident when it took place; and
- any other relevant safeguarding information that may assist the school in providing early intervention support to the child being referred.

The Council will share with the (relevant Child's) Schools key adult, information relating to the DA incident that is considered relevant and proportionate to enable the school to take appropriate action.

In addition, the council will hold:

- A database of trained key adults. (They must also ensure that there is a sufficiently trained deputy to receive the information in their absence and any changes to the database must be reported to the single point of contact (SPOC) as soon as practicable)
- A contact email address for the key adult; and
- A contact telephone number for the key adult to be contacted on.

The School will use the information as set out and will not onwardly disclose the information received from the Council. A record will be securely held in the child's safeguarding file.

7. Roles and Responsibilities under this Agreement

The people who will have access to the information under this Agreement are:

Norfolk Constabulary (ICO Registration number Z4894872) T/DI Alix Wright – MASH Domestic Abuse Safeguarding Team

Norfolk County Council Children's Services (ICO Registration number Z534327X)

Jonathon Cockerill Education Representative – Norfolk Multi Agency Safeguarding

Hub

Norfolk Schools – Key Adults – as per list of signatories at Appendix E

The Constabulary and the Council's Children's Services must identify a single point of contact ("SPOC") who will be responsible for the development of this Agreement on behalf of the relevant business area and the first port of call for any questions about this agreement. The "SPOC" will also be responsible for any reviews or amendments to the Agreement. The "SPOC" for each partner should also be notified of any breach or dispute and will be responsible for obtaining authorisation to disclose any information to a third party.

SPOC's should maintain regular contact with each other and ensure that appropriate audit trails of sharing are retained and made available when required. Any changes in SPOC will be notified in writing as soon as practicable and in any event within 5 working days after such a change has occurred.

The SPOCs are:

Name: Detective Chief Inspector David Freeman

Position: Safeguarding DCI Contact details: 01953 426001

Norfolk County Council Children's Services

Name: Kelly Waters

Position: Senior Adviser Safeguarding - Education Quality Assurance & Intervention Service

Schools - Individual schools key adults

Only appropriate and properly authorised persons will have access to the information specified in this Agreement. If in doubt, a person intending to share or access information should contact their SPOC or Data Protection /Information Management Team.

All Parties must be fully aware of their obligations under the GDPR and DPA 2018 and must have the appropriate training, policies and procedures in place to ensure compliance.

It will be the responsibility of all partners to ensure that:

- Realistic expectations prevail from the outset
- Ethical standards are maintained
- A mechanism exists by which the flow of information can be controlled
- A mechanism exists by which the integrity of the data is upheld
- Appropriate training with regard to both this agreement and the GDPR and DPA 2018 in general is given to all relevant staff
- Adequate arrangements exist to audit adherence to the Agreement
- The sharing is covered under each party's privacy information notice

The Parties are aware that the deliberate or reckless disclosure of personal data (obtained under this Agreement) to other organisations or persons may amount to a criminal offence under the DPA.

#### The Constabulary's role

The Constabulary will collate and prepare a spreadsheet of all domestic incidents where a child was present. This will be emailed to Children's Services staff within the MASH.

#### The Council's Children's Advice and Duty Service (CADS) Role:

The Council's CADS will

- place the information on the Liquid Logic/PSS/Core+ case management system and
- identify the relevant School(s)
- ring these Schools before 9am to notify them of the incident and provide sufficient information to the Schools so that the Schools are able to provide emotional support for children involved.
- keep an accurate record of all calls made
- keep an accurate record of named Key Adults for each education provider

#### The Council's Overarching Role

#### The Council will

- provide a briefing session for all designated Key Adults nominated by their school, prior to the school receiving notifications. ensure the briefing session is relevant and informative
- ensure briefing sessions are regular and spread through the localities to maximise coverage
- regularly review Operation Encompass

#### The School's role:

#### The Schools will

- ensure there is a Key Adult and deputy within the school and that they have attended
  the appropriate briefing prior to receiving notifications. This must be someone who is
  a trained DSL with responsibly for safeguarding.
- ensure the Key Adult signs the Operation Encompass Agreement (See Appendix D) and returns it to designated officer.
- ensure the Key Adult is available to receive the notification from Children's Services staff each morning
- ensure they keep an accurate record of each notification and store it utilising the current process used to store child protection paperwork within the school.
- provide silent or overt support to child, following a notification.
- provide MASH with an up-to-date list of the Key Adults within their school and contact numbers.

#### 8. Third Parties

Information shared under this Agreement must not be disclosed to any third party without the written consent of the Party that provided the information. It must be stored securely and deleted when it is no longer required for the purpose for which it was provided.

If any information shared under this agreement is intended for disclosure to any third party outside this agreement the partner making the intended disclosure will consult the originating partner prior to the disclosure being made.

Disclosure of personal data must be relevant. Only the minimum amount of information that needs to be shared to achieve the purpose for sharing it shall be supplied. Where a report is received regarding a child who resides in Norfolk but attends an out of county school then this information will not be shared as they are not covered by this protocol.

The identity of the originator must be recorded against the relevant data. No secondary use or other use may be made of the information unless the consent of the disclosing party to that secondary use is sought and granted in writing.

Disclosure must be compatible with the second data protection principle:

'Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing

for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with Article 89(1), not be considered to be incompatible with the initial purpose ('purpose limitation'). (Article 5 (1(b)) General Data Protection Regulation)

#### 9. Confidentiality and Vetting

The information shared under this Agreement is classified under the Government Security Classification Scheme as OFFICIAL-SENSITIVE. Under the GSC, handling caveats/conditions may also be applied in addition to the protective marking; these will be clear and self-evident as to their meaning or requirements.

Vetting is not mandatory to view this grade of information; however staff working in the Council and Schools will either be vetted to NPPV level 2 or have an 'Enhanced' DBS check. What is required at this level of access is a strict 'need-to-know' the information, which all staff viewing shared information must have.

#### 10. Information Security

#### 10.1 Information/Data Transfer

Information will be transferred electronically between the Parties using secure e-mail networks only, such as pnn, gcsx. gsi, gse, nhs.net or cjsm or by recorded delivery, telephone, and verbally at meetings or in person.

After March 2019, the majority of the secure email addresses will no longer be supported (with the exception of .pnn and .cjsm). Alternative secure transfer methods will need to be considered and in place prior to March 2019.

The Parties will take into consideration the requirements of the GDPR including Articles 44-49 in relation to international transfer.

- 44-General principle for transfers
- 45-Adequate levels of protection
- 46-Transfers subject to appropriate safeguards
- 47-Binding corporate rules
- 48-Transfers or disclosures not authorised by Union Law
- 49-Derogations for specific situations

Should any Parties wish to transfer information to a third country or to an International organisation they must liaise with their Data Protection Officer for further advice.

#### 10.2 Security

All agencies that are provided information under this Agreement are required to conform to the following Norfolk Constabulary Information Security Policy Statement – **Appendix A**, for the purpose of ensuring that a suitable standard for Information Security is maintained.

#### 10.3 Retention and Destruction

The information will be retained by Parties under Operation Encompass in line with existing and established business processes, guidelines and legislation. The Constabulary will retain information in line with MOPI whilst the Council and the Schools will retain information in line with their organisation's retention period. All hard copies will then be destroyed by use of a cross shredder. All information on computer systems will be securely deleted.

#### 11. Operational requirements of this Agreement

#### 11.1 Training and Awareness

All Parties will ensure that all individuals likely to come in contact with the data shared under this agreement are trained in the terms of this agreement, their own responsibilities and their obligations under the GDPR and the DPA.

#### 11.2 Subject Access Request

All Parties will comply with the requirements of the **GDPR** including Articles 12-22 in relation to subject rights.

- 12 Exercise of the rights of the data subject
- 13 Information to be provided where personal data are collected from the data subject
- 14 Information to be provided where personal data have not been obtained from the data subject
- 15 Right of access by the data subject
- 16 Right to rectification
- 17 Right to erasure ('right to be forgotten')
- 18 Right to restriction of processing
- 19 Notification obligation regarding rectification or erasure of personal data or restriction of processing
- 20 Right to data portability
- 21 Right to object
- 22 Automated individual decision-making, including profiling

Any Party receiving a written or verbal request for subject access to personal information under Article 15 of the GDPR relating to information shared under this Agreement must direct the request to their Data Protection Officer who will consult with the other Parties prior to the release of any information provided by those Parties. In order to facilitate this, information should be clearly labelled to identify the source Party.

If a Party receives a subject access request and personal data is identified as originating from another agency, it will be the responsibility of the receiving agency to contact the data provider within 2 working days (of becoming aware that Operation Encompass forms part of the request) to consult on the application of potential exemptions under the provisions of the Data Protection Act 2018.

If a Party receives a request from an individual to exercise a right to erasure, rectification, restrict processing, or objection to processing in respect of information shared under this Agreement, it will be the responsibility of the receiving party to contact the other Party within

2 working days to inform them of the action taken. It will also be the responsibility of the receiving party to inform the individuals about the recipient(s) of the relevant personal data.

#### 11.3 Complaints, Security Incidents/Data Breaches/Losses

Any complaints received by the Parties from individuals about the process or procedural issues relating to this Agreement, or regarding information held by any of the parties to this Agreement, will be referred to the Data Protection Officer for the relevant Party for investigation. Where such complaints relate to alleged inaccurate information the Parties will liaise with the Data Protection Officer of the party involved and the appropriate course of action will be taken.

Any potential data loss or breach of Data Protection legislation, including information shared under this agreement being disclosed outside of this agreement, should immediately be brought to the attention of the relevant Parties Business Lead(s), Data Protection Officer, and their counterpart(s) within the other relevant Party. Depending on the urgency, notification of the breach can be made initially verbally and then sent via email. It will be the responsibility of the respective controller to report the incident immediately and to follow their security incident reporting procedures. Should a breach be reported to the Constabulary's Business Lead(s), they shall, without delay, complete and submit an Information Security Incident Form to Information Security who shall deal with the breach in line with the policy.

#### 11.4 Data Quality

It is the responsibility of all Parties to ensure that the information is of sufficient quality for its intended purpose, bearing in mind accuracy, validity, reliability, timeliness, relevance and completeness. All information should be checked in respect of quality prior to being shared.

Information discovered to be inaccurate or inadequate for the purpose will be notified to the data owner who will be responsible for correcting the data and notifying all other recipients of the data who must ensure that the correction is made.

All Parties must have processes in place to monitor and check the quality of information.

#### 11.5 Ownership of the information and Indemnity

The Chief Executive/Officer of the Party holding the personally identifiable information will be the Controller. The Chief Executive/Officer of the Party receiving the information will become the Controller on receipt and will be responsible for ensuring that the information is held and used securely in accordance with Data Protection legislation, other relevant legislation, this Agreement and will accept total liability for a breach of this Agreement should any legal proceedings be served in relation to the breach.

There is no requirement for an indemnity in relation to this ISA as the responsibility of Data Controller passes to the receiving party.

The Parties shall not assign, sub-contract or transfer its rights or obligations under this Agreement in whole or part to any third party without prior written consent of the other parties.

#### 11.6 Commencement, Review and Audit

This Agreement replaces the previous Information Sharing Agreement between the Parties, which commenced from the start of the Autumn Term 2016.

This Agreement will be reviewed on an annual basis. Interim reviews of this Agreement may, however, be carried out at the specific request of any of the Parties.

Each Party will ensure they keep an audit trail of all information shared and received in relation to the purpose and processes of this Agreement.

Each Party will provide the other Party on reasonable request with evidence that all aspects of this Agreement are being complied with.

The Parties will allow the other Party to carry out an audit to ensure each Party is in compliance with this Agreement.

The Parties will complete the Norfolk Constabulary Annual Audit Declaration - **Appendix B** on request. The SPOC for Norfolk Constabulary will be responsible for ensuring that the Parties complete the Annual Audit Declaration.

The Parties will report all issues, complaints or queries about the operation of this Agreement at each of its reviews and the outcomes recorded in writing.

#### 11.7 Termination

This Agreement may be terminated at any time upon receipt of a written request from any of the Parties and with the agreement of the other Parties.

#### 12. Signatures

Organisations signatures: I confirm I have read and understood this agreement and am duly authorised to sign this agreement. I hereby agree to the terms and conditions imposed therein.

Name of Organisation: Norfolk Constabulary

Dalf fill

Name: Paul Sanford,

Position: T/Deputy Chief Constable

Signature:

Date: 13 March 2019

Contact Telephone Number:

Name of Organisation: Norfolk County Council

Name: Debby McKechnie

Position: Children's Services Head of Quality and Effectiveness and Caldicott Guardian

Signature: DA McKea

Date:12/03/19

Contact Telephone Number:

Further details to be added as the school joins the Agreement. Targeted schools are listed in Appendix E

#### **APPENDIX A**

#### **Constabulary Information Security Policy Statement**

All Chief Constables are committed to compliance with the Community Security Policy, and they and Partner Organisations are expected to ensure that all data and information is handled in line with the HMG Security Policy Framework, specifically meeting the following Mandatory Requirement:

Departments and Agencies must have an information security policy setting out how they and any delivery partners and suppliers will protect any information assets they hold, store or process (including electronic and paper formats and online services) to prevent unauthorised access, disclosure or loss. The policies and procedures must be regularly reviewed to ensure currency.'

#### Scope

These Information Security Requirements and Objectives apply to the following:

Roles & Responsibilities

All persons or parties conducting work for either Signatory regardless of any form of employment, including contractors providing services, agency workers and trainees on vocational or work experience.

- Data & Information
  - Whether stored, copied, duplicated or transmitted, all 'soft' (electronic, digital and virtual) data, information and communications on servers, networks, connectivity, ICT kit such as PCs, workstations, laptops, and authorised multimedia devices including USBs, mobile phones, tapes and CDs.
  - Also 'hard' information printed or written on paper or other medium such as whiteboards and flipcharts, and transmitted by any method whatsoever, such as fax or scanner.
  - Additional safeguards should be considered, specified and documented according to the sensitivity and classification of the data, information, and/or circumstances of the Agreement, for example observing operational security, such as precautions against eavesdropping.
- Data: The Data Protection Act & Information Commissioner's Office
  - Where Signatories process personal data defined by the Act, they agree to apply security measures, commensurate with principle 6 of the Data Protection Act 2018: "processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle. "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage)
  - These Information Security Requirements and Objectives should evidence this principle.

#### Information Security Requirements & Objectives

To that end, Signatories to this agreement should ensure, document and be able to evidence, that they have in place common technical and organisational security arrangements, evidencing the following appropriate, proportionate and reasonable Information Security Requirements and Objectives:

- Information Security risk assessments to establish, evaluate and accept risks, and put in place appropriate controls to manage them.
- Information Security Policies, Guidelines, Processes, Controls and Practices in place to protect, and ensure the confidentiality, integrity and availability of data and information and systems under their control.
- An Information Security Review process at planned intervals, so that should significant changes occur this will ensure their continued suitability, adequacy, and effectiveness; i.e. for technological, legal, contractual and regulatory requirements and organisational changes.

Specifically, they should address the Information Security Requirements and Objectives below.

- Information Security Policy A documented Information Security Policy should provide governance, management direction and support for information security according to relevant business and organisational requirements, contractual obligations, laws, statutes, regulations and best practices.
- Organisation of Information Security Internal Organisation & External Parties to manage information security within the organisation, and maintain the security of information and information processing facilities that are accessed, processed, communicated to, or managed by external parties.
- Asset Management Responsibility for Assets & Information Classification to achieve and maintain appropriate protection of organisational assets, and ensure information receives an appropriate level of protection.
- Human Resources Security Prior to, During & After Employment. Training & Awareness to ensure that employees, contractors, third parties, and other users understand their responsibilities, and are suitable for the roles they are considered; reducing the risk of theft, fraud or misuse of facilities; and are aware of information security threats and concerns, their responsibilities and liabilities, and are equipped to support security policy in their normal work, reducing the risk of error; and to ensure that all users exit or change employment in an orderly manner. Information security programmes should be available and imparted to all relevant users.
- Physical & Environmental Security Secure areas & Equipment Security to
  prevent unauthorised physical access, damage and interference to the organisation's
  premises and information; and prevent loss, damage, theft or compromise of assets
  and interruption to the organisation's activities.
- Communications & Operations Management Operational Procedures, Responsibilities & Third Party Service Delivery Management to ensure the correct and secure operation of information processing facilities; and implement and maintain the appropriate level of information security and service delivery in line with third party service delivery agreements;
- System Planning Acceptance & Protection against malicious & mobile code to minimise the risk of systems failures; and protect the integrity of software and information:

- Back-up & Network Security Management To maintain the integrity and availability of information and information processing facilities, and ensure the protection of information in networks and the protection of the supporting infrastructure.
- Media Handling Exchange of Information & Monitoring to prevent unauthorised disclosure, modification, removal or destruction of assets, and interruption to business activities; maintain the security of information and software exchange internally and with any external entity; and detect unauthorised information processing activities.
- Electronic Commerce Services To ensure their security, and secure use.

#### Access Control

- Business Requirement for Access Control & User Access Management to control access to information, ensuring authorised user access, preventing unauthorised access to information systems.
- User Responsibilities & Network Access Control to prevent unauthorised access, compromise, theft of information and information processing facilities; and access to networked services.
- Operating System, Access, Application, & Information Access Control to prevent unauthorised access to operating systems; and information held in application systems.
- Mobile Computing & Teleworking to ensure information security when using mobile computing and teleworking facilities.

#### • Information Systems Acquisition, Development & Maintenance

- Security Requirements of Information Systems & Correct Processing in Applications to ensure that security is an integral part of information systems, and prevent errors, loss, unauthorised modification or misuse of information in applications.
- Cryptographic Controls & Security of System Files to protect the confidentiality, authenticity or integrity of information by cryptographic means, and ensure the security of system files.
- Security in Development, Support Processes & Technical Vulnerability Management to maintain the security of application system software and information, and reduce risks resulting from exploitation of published technical vulnerabilities.
- Information Security Incident & Breach Management To report information security threats, events and weaknesses ensuring those associated with information systems are communicated to allow timely corrective action; and manage incidents and improvements, ensuring a consistent and effective approach is applied to information security incidents.
- Business Continuity Management To counteract interruptions to business
  activities and to protect critical business processes from the effects of major failures
  of information systems or disasters and to ensure their timely resumption.
- Compliance with Legal Requirements To avoid breaches of any law, statutory, regulatory or contractual obligations, and of any security requirements, and that they are met wherever applicable; and to ensure compliance of systems with organisational security policies and standards, and to maximize the effectiveness of and to minimise interference to/from the information systems audit process.



# ANNUAL AUDIT DECLARATION FOR THE OPERATION ENCOMPASS INFORMATION SHARING AGREEMENT

"I confirm that I have sample checked a number of requests for police information to ensure all police information received has only been used/processed in line with the Operation Encompass Information Sharing Agreement. Any exceptions have been reported to Norfolk Constabulary."

ORGANISATION:
Signature:
Name:
Date:

#### **APPENDIX C**

#### Notification process for schools for Domestic Abuse & Violence incidents

This process intends to notify schools before 9am or as soon as possible thereafter where a child has been witness, present or involved in a domestic incident, where police have attended. This process does not replace existing child protection / safeguarding arrangements.

Police attend domestic violence incident

Details of the incident are taken, including all present and witness



Details recorded / DASH assessment completed

Daily spreadsheet completed and sent to Children's Services



Children's Services staff complete Liquid Logic (LCS/EHM)/PSS/Core+ checks and Education setting identified



Children's Services staff contacts Key Adult at the identified school before 9am or as soon as possible thereafter. Monday will include all incidents that occurred Friday - Sunday

Excel spread sheet to be updated by Children's Services Staff. Incident number, school and Key Adult to be recorded





Key Adult to record information on contact form and place on child protection file



School to determine and deliver appropriate support – overt or covert

#### APPENDIX D

#### **Operation Encompass Agreement**

Operation Encompass is a joint operation between Norfolk Children's Services, Norfolk Police and School. It has been established to provide schools with notification of domestic incidents that have occurred the previous day before 9am the following morning. This enables schools to provide timely support to the children and their families. To enable schools to start receiving notifications they must have;

- Read and agreed to the Information Sharing Agreement
- Provide at least 2 nominated members of staff to be Key Adults, they must to Designated Safeguarding Trained and have attended the Operation Encompass Briefing. Informing the named person in the protocol when a Key Adult leaves the school.
- Informed all parents of the school about their intentions to be part of Operation Encompass.

Please complete the form below and return via email to:operationencompass@norfolk.gov.uk

| Name              |  |
|-------------------|--|
| Job title         |  |
| School            |  |
| Contact<br>Number | (Please include direct dials/mobile numbers if applicable) |
|                   | (Please include direct dials/mobile numbers if applicable) |

I confirm that I have read and agreed to the information Sharing Agreement.

I confirm that the school has sent the letter provided to all parents / carers informing them of the schools intentions to participate in Operation Encompass.

I confirm that I understand the sensitive nature of the information I may receive regarding е

| children young people and their families as part of operation Encompass and agree that the school is responsible for the approprriate sharing of that information thereafter. |  |  |
|---|--|--|
| Name:   |  |  |
| Job Title:  |  |  |
| Signature:  |  |  |
| Date:   |  |  |
|   |  |  |

#### **APPENDIX E**

#### Target schools for Operation Encompass;

| Acle Academy                          |
|---------------------------------------|
| Acle St Edmund C Of E Primary School  |
| Admirals Academy                      |
| Acorn Park School                     |
| Alburgh With Denton CE VC Primary     |
| School                                |
| Aldborough Primary School             |
| Alderman Peel High School             |
| All Saints Academy                    |
| All Saints Ce Va Primary, Winfarthing |
| All Saints School                     |
| Alpington & Bergh Apton CE VA Primary |
| School                                |
| Angel Road Infant School              |
| Angel Road Junior School              |
| Anthony Curton Ce Primary School      |
| Antingham And Southrepps Primary      |
| School                                |
| Archbishop Sancroft CE High School    |
| Arden Grove Infant & Nursery School   |
| Ashill VC Primary School              |
| Ashleigh Primary And Nursery School   |
| Ashwicken CE Primary School           |
| Aslacton Primary School               |
| Astley Primary School                 |
| Attleborough Academy Norfolk          |
| Attleborough Primary School           |
| Aurora Eccles School                  |
| Avenue Junior School                  |
| Aylsham High School                   |
| Bacton Primary School                 |
| Banham Community Primary School       |
| Barford Primary School                |
| Barnham Broom CE VA Primary School    |
| Bawdeswell Primary School             |
| Beeston Hall School, West Runton      |
| Beeston Primary School                |
| Bignold Primary School And Nursery    |
| The Bishop's CE VA Primary School     |
| Blakeney CE VA Primary School         |
| Blenheim Park Academy                 |
| Blofield Primary School               |
|                                       |

| Bluebell Primary School                  |
|--|
| Bradwell Homefield CE VC Primary         |
| School                                   |
| Brancaster CE VA Primary School          |
| Bressingham Primary School               |
| Brisley CE VA Primary School             |
| Broadland High Ormiston Academy          |
| Brooke VC CE Primary School              |
| Browick Road Primary and Nursery         |
| School                                   |
| Brundall School                          |
| Bunwell Primary School                   |
| Bure Valley School                       |
| Burnham Market Primary School            |
| Burston Primary School                   |
| Buxton Primary School                    |
| Caister Academy                          |
| Caister Infant School                    |
| Caister Junior School                    |
| Cantley Primary School                   |
| Carleton Rode CE VA Primary School       |
| Castle Acre Church Of England Primary    |
| Academy                                  |
| Caston CE VA Primary School              |
| Catfield CE VC Primary School            |
| Catton Grove Primary School              |
| Cawston Church of England Primary        |
| Academy                                  |
| Cecil Gowing Infant School               |
| Chapel Break Infant School               |
| Chapel Green School                      |
| Charles Darwin Primary School            |
| Cherry Tree Academy Trust Marham         |
| Infant                                   |
| Cherry Tree Academy Trust Marham         |
| Junior                                   |
| Churchill Park Academy                   |
| City Academy Norwich                     |
| City College Norwich                     |
| City of Norwich School                   |
| Clenchwarton Primary School              |
| Ormiston Cliff Park Infant School        |
| Ormiston Cliff Park Junior School        |
| Cliff Park Ormiston Academy              |
| Citi Fair Crimston Academy               |
| Clover Hill VA Infant and Nursery School |
| •  |

| Cobholm Primary Academy                              | East Norfolk Sixth Form College              |
|--|--|
| Colby Primary School                                 | East Ruston Infant & Pre-School              |
| Colkirk Church Of England Primary                    | Eastgate Academy                             |
| Academy  | Easton & Otley College                       |
| College Of West Anglia                               | Eaton Hall Specialist Academy                |
| Colman Infant School                                 | Eaton Primary School                         |
| Colman Junior School                                 | Edith Cavell Academy and Nursery             |
| Coltishall Primary School                            | Edmund De Moundeford VC Primary              |
| Corpusty Primary School                              | School                                       |
| Costessey Infant School                              | Edward Worlledge Ormiston Academy            |
| Costessey Junior School                              | Ellingham CE VC Primary School               |
| Cringleford CE VA Primary School                     | Emneth Academy                               |
| Cromer Academy                                       | Emneth Nursery School                        |
| Cromer Junior School                                 | Erpingham VC Primary School                  |
| Denver CE VC Primary School                          | Fairhaven CE VA Primary School               |
| Dereham Church Infant And Nursery<br>School          | Fairstead Community Primary & Nursery School |
| Dereham Church Of England Junior                     | Fakenham Academy Norfolk                     |
| Academy  | Fakenham Infant & Nursery School             |
| Dereham Neatherd High School                         | Fakenham Junior School                       |
| Dereham Sixth Form College                           | Falcon Junior School                         |
| Dersingham VA Primary & Nursery                      | Filby Primary School                         |
| School   | Firside Junior School                        |
| Diamond Academy                                      | Flegg High Ormiston Academy                  |
| Dickleburgh Church of England Primary                | Fleggburgh CE VC Primary School              |
| Academy  Disa CF Lucian Academy                      | Flitcham Church Of England Primary           |
| Diss CE Junior Academy                               | Academy                                      |
| Diss High School                                     | Focus School                                 |
| Diss Infants & Nursery School With Children's Centre | Forncett St. Peter CE VA Primary School      |
| Ditchingham Church Of England                        | Foulsham Primary School                      |
| Primary Academy                                      | Framingham Earl High School                  |
| Docking CE Primary School & Nursery                  | Fred Nicholson School                        |
| Downham Market Academy                               | Freethorpe Community Primary School          |
| Downham Preparatory School and                       | Frettenham Primary School                    |
| Montessori Nursery                                   | Future Education                             |
| Drake Primary School                                 | Garboldisham CE VC Primary School            |
| Drayton CE VC Junior School                          | Garrick Green Infant School                  |
| Drayton Community Infant School                      | Garvestone Primary School                    |
| Duchy of Lancaster Methwold CE                       | Gayton Church of England Primary             |
| Primary School                                       | Academy                                      |
| Dussindale Primary School                            | Gaywood Primary School                       |
| Earlham Nursery School                               | George White Junior School                   |
| Earsham CE VA Primary School                         | Ghost Hill Infant & Nursery School           |
| East Coast College (Gt Y)                            | Gillingham St Michael's Church Of            |
| East Harling Primary School & Nursery                | England Academy                              |
|  |  |

|   | Hilgay Riverside Academy                    |
|---|---|
| Glebe House School                          | Hillcrest Primary School                    |
| Glebeland Primary School                    | Timerest Timary School                      |
| Gooderstone Church of England Primary       | Hillside Avenue Primary & Nursery School    |
| Academy                                     | Hillside Primary School                     |
| Great Dunham Primary School                 | Hindringham CE VC Primary School            |
| Great Ellingham Primary School              | Hingham Primary School                      |
|   | Hobart High School                          |
| Great Hockham Primary School and<br>Nursery | Hockering C Of E Primary Academy            |
|   | Holly Meadows School                        |
| Great Missingham CE Primary School          | Holt Community Primary School               |
| Great Witchingham C of E Primary            | Hopton Church of England Primary Academy    |
| Academy                                     | Horatio House Independent School            |
| Great Yarmouth Charter Academy              | Horning Community Primary School            |
| Great Yarmouth Primary Academy              | Horsford C Of E Va Primary School           |
| Gresham Village School and Nursery          | Howard Junior School                        |
| Gresham's Nursery and Pre-Preparatory       | Hunstanton Primary School                   |
| School                                      | Iceni Academy                               |
| Gresham's Prep School                       | Include Schools Norfolk                     |
| Gresham's School (HOLT)                     | Ingoldisthorpe CE VA Primary School         |
| Greyfriars Primary School                   | Jane Austen College                         |
| Grove House Infant and Nursery School       | John Grant School                           |
| Hainford Primary Partnership School         | John Of Gaunt Infant & Nursery School       |
| Hall School                                 | Kelling CE Primary School                   |
| Happisburgh Ce Va Primary and Early         | Kenninghall Primary School                  |
| Years School                                | KES Academy                                 |
| Hapton C Of E Va Primary School             | King's Lynn Academy                         |
| Harford Manor School                        | King's Lynn Nursery School                  |
| Harleston CE Primary Academy                | Kings Oak Academy                           |
| Harpley CE VC Primary School                | King's Park Infant School                   |
| Heacham Infant & Nursery School             | Kinsale Infant School                       |
| Heacham Junior School                       | Kinsale Junior School                       |
| Heartsease Primary Academy                  | Lakenham Primary School                     |
| Heather Avenue Infant School                | Langham Village School                      |
| Hellesdon High School                       | Langley Preparatory School at Taverham Hall |
| Hemblington Primary School                  | Langley School                              |
| Hempnall Primary School                     | Lingwood Primary Academy                    |
| Hemsby Primary School                       | Lionwood Infant & Nursery School            |
| Henderson Green Primary Academy             | Lionwood Junior School                      |
|   | Litcham School                              |
| Hethersett Academy                          | Little Melton Primary School                |
| Hethersett Old Hall School                  | Little Plumstead CE VA Primary School       |
| Hethersett VC Junior School                 | Little Snoring Community Primary Academy    |
| Hethersett Woodside Infant & Nursery        | Loddon Infant & Nursery School              |
| School                                      | Loddon Junior School                        |
| Hevingham Primary School                    | Lodge Lane Infant School                    |
| Hickling CE VC Infant School                | Long Stratton High School                   |
| Highgate Infant School                      |   |
|   |   |

| Ludham Primary School and Nursery                              |  |
|--|--|
| Lyng CE VC Primary School                                      | North Walsham Infant School & Nursery                      |
| Lynn Grove Academy   |  |
| Magdalen Academy   | North Walsham Junior School                                |
| Magdalen Gates Primary School                                  | North Wootton Academy                                      |
|  | Northgate High School                                      |
| Manor Field Infant & Nursery School                            | Northgate Primary School                                   |
| Marsham Primary School   | Northrepps Primary School                                  |
| Marshland High School  | Norwich High School  |
| Marshland St James Primary And                                 | Norwich High School for Girls                              |
| Nursery School   | Norwich Primary Academy                                    |
| Martham Academy and Nursery                                    | Norwich Road Academy                                       |
| Mattishall Primary School                                      | Norwich School   |
| Middleton Church Of England Primary                            | Norwich Steiner School                                     |
| Academy  | Notre Dame High School, Norwich                            |
| Mile Cross Community Primary School                            | Notre Dame Preparatory School                              |
| Millfield Primary School                                       | (Norwich) Limited  |
|  | Novaturient School   |
| Moorlands Church Of England Primary Academy                    | Old Buckenham High School Old Buckenham Primary School and |
| •  | Nursery  |
| Morley CE VA Primary School  Mousehold Infant & Nursery School | Old Catton CE Junior School                                |
| ,  | Open Academy   |
| Mulbarton Community Infant School                              | Ormesby Village Infant School                              |
| Mulbarton Primary School                                       | Ormesby Village Junior School                              |
| Mundesley Junior School  | Ormiston Herman Academy                                    |
| Mundford Church Of England Primary                             | Ormiston Venture Academy                                   |
| Academy  | Ormiston Victory Academy                                   |
| Narborough Church Of England Primary<br>Academy                | Overstrand The Belfry CE VA Primary School                 |
| Neatishead VC Primary School                                   | Parker's CE VC Primary School                              |
| Necton VA Primary School                                       | Paston College (City College Norwich)                      |
| Nelson Academy   | Peterhouse Church Of England Primary                       |
| Nelson Infant School   | Academy  |
| Newton Flotman CE VC Primary School                            | Poringland Primary School & Nursery                        |
| Nightingale Infant & Nursery School                            | Preston CE VC Primary School                               |
| North Denes Primary School                                     | Pulham CE Primary School                                   |
| North Elmham VC Primary School                                 | Queen's Hill Primary & Nursery School                      |
| ·  | Queensway Infant Academy and Nursery                       |
| North Walsham High School                                      | Rackheath Primary School                                   |
|  | Raleigh Infant Academy                                     |
|  | raieigii iiiiaiit Acadeiiiy                                |

Recreation Road Infant School

| Red Balloon Learner Centre                 | Southtown Primary School                |
|--|---|
| Redcastle Family School                    | Sparhawk Infant School & Nursery        |
| Reedham Primary School                     | Spixworth Infant School                 |
| Reepham High School & College              | Spooner Row Primary School              |
| Reepham Primary School                     | Sporle Church Of England Primary        |
| Reffley Academy                            | Academy                                 |
| Riddlesworth Hall School                   | Springwood High School                  |
| Robert Kett Primary School                 | Sprowston Community Academy             |
| Rockland St. Mary Primary School           | Sprowston Infant School                 |
| Rocklands Community Primary School         |   |
| Rollesby Primary School                    | Sprowston Junior School                 |
| Rosecroft Primary School                   | St. Andrew's Church of England Primary  |
| Roydon Primary School                      | Academy                                 |
| Rudham Church of England Primary           | St. Andrew's Lopham CE VA Primary       |
| Academy                                    | School                                  |
| Runcton Holme Church Of England            | St Andrews School                       |
| Primary School                             | St. Augustine's Catholic Primary School |
| Sacred Heart School                        | St. Clement's High School (Academy)     |
| Salhouse CE VC Primary School              | St Clements Hill Primary Academy        |
| Sandringham & West Newton Church           | St. Edmund's Academy                    |
| of England Primary Academy                 | St. Faiths CE VC Primary School         |
| Saxlingham Nethergate CE VC Primary School | St. Francis Of Assisi Catholic Primary  |
| Scarning VC Primary School                 | School                                  |
| Scole CE VC Primary School                 | St. George's Primary & Nursery School   |
| Sculthorpe Church Of England Primary       | St. Germans Academy                     |
| Academy                                    | St. John's Community Primary School &   |
| Sedgeford Primary School                   | Nursery                                 |
| Seething & Mundham Primary School          | St. Martha's Catholic Primary School    |
| Sewell Park Academy                        | ·                                       |
| Shelton With Hardwick Community            | St. Martin At Shouldham CE Primary      |
| School                                     | Academy                                 |
| Sheridan House School                      | St. Mary And St. Peter Catholic Primary |
| Sheringham Community Primary               | School                                  |
| School & Nursery                           | St. Mary's Church Of England Junior     |
| Sheringham High School                     | School                                  |
| Sheringham Woodfields School               | St. Mary's Community Primary School     |
| Sidestrand Hall School                     | St. Mary's Endowed VA CE Primary        |
| Sir Isaac Newton Sixth Form Free           | School                                  |
| School                                     | St. Michael's Ce Va Junior School       |
| Smithdon High School                       | St. Michael's Church of England         |
| Snettisham Primary School                  | Academy                                 |
| South Wootton Infant School                |   |
| South Wootton Junior School                |   |
|  |   |

Southery Academy

| St. Michael's Church of England VA Primary & Nursery School St Nicholas House Preparatory & Kindergarten School St. Nicholas Priory CE VA Primary School St. Peter & St. Paul Carbrooke Church of England Primary Academy St. William's Primary School Stalham Academy Stalham Community Infant & Pre- School Stalham High School Stalham High School Stalbard All Saints CE VA Primary School Stradbroke Primary Academy Suffield Park Infant & Nursery School Surtingham Primary School Surtingham Primary School Swaffham CE VC Infant School Swaffham CE VC Infant School Swaffham CE VC Infant School Swanton Abbott Community Primary School Swanton Morley VC Primary School Taverham High School Taverham High School Taverham VC CE Junior School Tren Mile Bank Riverside Academy Terrington St. John Primary School The Bawburgh School The Brooklands Short Stay School For Norfolk The Clare School The Compass – Belton Short Stay School For Norfolk Walsingham CE VA Primary School The Compass – Lingwood Short Stay School For Norfolk Walsingham CE VA Primary School   |                                      |  |
|--|--------------------------------------|--|
| St Nicholas House Preparatory & Kindergarten School St. Nicholas Priory CE VA Primary School St. Peter & St. Paul Carbrooke Church of England Primary Academy St Peter's C of E Primary Academy St Peter's C of E Primary Academy St Hillam's Primary School Stalham Academy Stalham Community Infant & Pre-School Stalham High School Stalbam High School Stabam High School Stradbroke Primary Academy Suffield Park Infant & Nursery School Surlingham Primary School Surlingham Primary School Swaffham Cburch Of England Junior Academy Swanton Abbott Community Primary School Taverham High School Taverham High School Taverham High School Taverham WC CE Junior School Tare Mile Bank Riverside Academy The Nicholas Hamond Academy The Norman Church Of England Primary School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School For Norfolk The Wherry School The Brosebery Short Stay School The Brosebery Short  | St. Michael's Church of England VA   | The Compass – Pott Row Short Stay School   |
| Kindergarten School St. Nicholas Priory CE VA Primary School St. Peter & St. Paul Carbrooke Church of England Primary Academy St. Peter's C of E Primary Academy St. William's Primary School Stalham Academy Stalham Community Infant & Pre- School Stalham High School Stalham High School Stibbard All Saints CE VA Primary School Stradbroke Primary Academy Stradbroke Primary Academy Suffield Park Infant & Nursery School Surlingham Primary School Surlingham Primary School Swaffham CE VC Infant School Swaffham CE VC Infant School Swaffham Ce VC Infant School Swaffham Church Of England Junior Academy Swanton Abbott Community Primary School Taverham VC CE Junior School Taverham WC CE Junior School Tarentham VC CE Junior School Tarentham School Taverham VC CE Junior School Tarentham School Taverham | Primary & Nursery School             | For Norfolk                                |
| St. Nicholas Priory CE VA Primary School  St. Peter & St. Paul Carbrooke Church of England Primary Academy St. William's Primary School Stalham Academy Stalham Cademy Stalham Camunity Infant & Pre- School Stalham High School Stalham High School Stradbroke Primary Academy Suffield Park Infant & Nursery School Surlingham Primary School Surlingham Primary School Swaffham CE VC Infant School Swaffham CE VC Infant School Swanton Morley VC Primary School Taverham High School Taverham High School Taverham VC CE Junior School Taverham VC CE Junior School Terrington St. Clement Community School The Brooklands Short Stay School For Norfolk The Clare School The Compass – Belton Short Stay Walpole Vap Primary School The Compass – Lingwood Short Stay Walpole Linghway Community Primary School Walsingham CE VA Primary School Tunstead Primary School Tunstead Primary School Tunstead Primary School Walpole Linghway Community Primary School Walpole Linghway Community Primary School Walsingham CE VA Primary School  | St Nicholas House Preparatory &      | · · · · · · · · · · · · · · · · · · ·      |
| School  St. Peter & St. Paul Carbrooke Church of England Primary Academy  St. Peter's C of E Primary Academy  St. William's Primary School  Stalham Academy  Stalham Cademy  Stalham High School  Stalham High School  Stibard All Saints CE VA Primary  School  Stradbroke Primary Academy  Suffield Park Infant & Nursery School  Surlingham Primary School  Surlingham Primary School  Swaffham CE VC Infant School  Swaffham CE VC Infant School  Swanton Abbott Community Primary  School  Taverham Vigh School  Taverham Wigh School  Taverham Wigh School  Terrington St. Clement Community School  The Brooklands Short Stay School For Norfolk  The Brooklands Short Stay School For Norfolk  Thorpe St Andrew School and Sixth Form  Thurtton Primary School  Tilney XII Saints Ce Primary School  Tilney XII Saints Ce Primary School  Tilney St. Lawrence Community Primary School  Toftwood Community Junior School  Toftwood Infant School  Toftwood Infant School  Toftwood Infant School  Toftwood Community Junior School  Toftwood Infant School  Toftwood Infant School  Toftwood Infant School  Toftwood Community Junior School  Toftwood Infant School  Town Close House Preparatory School  Tuckswood Academy  Town Close House Preparatory School  Tuckswood Academy  Town Close House Preparatory School  Tuckswood Academy  Valley Primary School  Walpole Cross Keys Primary School  Walpole Highway Community Primary School  Walpole Highway Community Primary School  Walpole Highway Community Primary School   | Kindergarten School                  | Norfolk                                    |
| School St. Peter & St. Paul Carbrooke Church of England Primary Academy St Peter's C of E Primary Academy St. William's Primary School Stalham Academy Stalham Cammunity Infant & Pre-School Stalham High School Stalham High School Stoke Holy Cross Primary School Stradbroke Primary Academy Suffield Park Infant & Nursery School Surlingham Primary School Swaffham CE VC Infant School Swaffham CE VC Infant School Swaffham Church Of England Junior Academy Swanton Abbott Community Primary School Taverham High School Taverham VC CE Junior School Taverham VC CE Junior School Terrington St. Clement Community School The Brooklands Short Stay School For Norfolk The Clare School The Broklands Short Stay School For Norfolk The Clare School The Grammar School Turesthall Primary School Toftwood Community Primary School Toftwood Community Junior School Trowse Primary School Tuckswood Academy And Nursery Tunstead Primary School Tuckswood Academy And Nursery Tunstead Primary School Tine Bree School Norwich The Hewett Academy The Hocksley Short Stay School For Norfolk The Nicholas Hamond Academy The Norman Church Of England Primary School The Parkside School The Wherry School Thomas Bullock Church of England Primary Academy The Wherry School Thomas Bullock Church of England Primary School Thomas Bullock Church of England Primary School Thomas Bullock Church of England Primary Academy The Wherry School Thomas Bullock Church of England Primary School Thomas Bulloc |                                      | The Earthsea Short Stay School For Norfolk |
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| Swaffham Church Of England Junior Academy  Swanton Abbott Community Primary School  Swanton Morley VC Primary School  Tacolneston CE VA Primary School  Taverham High School  Taverham VC CE Junior School  Ten Mile Bank Riverside Academy  Terrington St. Clement Community School  Terrington St. John Primary School  The Bawburgh School  The Brooklands Short Stay School For Norfolk  The Compass – Belton Short Stay School For Norfolk  The Compass – Lingwood Short Stay  Thorpe St Andrew School and Sixth Form Thurlton Primary School  Thurlton Primary School  Tilney All Saints Ce Primary School  Tilney St. Lawrence Community Primary School  Tivetshall Primary School  Toftwood Community Junior School  Town Close House Preparatory School  Trowse Primary School  Tuckswood Academy And Nursery  Tunstead Primary School  University Technical College, Norfolk  Upwell Academy  Valley Primary Academy  Walpole Cross Keys Primary School  Walpole Highway Community Primary School  Walsingham CE VA Primary School   | Sutton CE VC Infant School           | Academy                                    |
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| Swanton Abbott Community Primary School  Swanton Morley VC Primary School  Tacolneston CE VA Primary School  Taverham High School  Taverham VC CE Junior School  Ten Mile Bank Riverside Academy  Terrington St. Clement Community School  Terrington St. John Primary School  The Bawburgh School  The Brooklands Short Stay School For Norfolk  The Clare School  The Compass – Belton Short Stay School For Norfolk  Thurton CE VC Primary School  Tilney All Saints Ce Primary School  Totwood Community Junior School  Totwood Infant School  Totwood Infant School  Totwood Community Junior School  Totwood Community Junior School  Totwood Community Junior School  Totwood Infant School  T | Academy                              | •  |
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| The Brooklands Short Stay School For Norfolk  The Clare School  The Compass – Belton Short Stay School For Norfolk  The Compass – Lingwood Short Stay  Walpole Cross Keys Primary School  Walpole Highway Community Primary School  Walsingham CE VA Primary School  | Terrington St. John Primary School   | Tuckswood Academy And Nursery              |
| Norfolk The Clare School The Compass – Belton Short Stay School For Norfolk The Compass – Lingwood Short Stay Walpole Cross Keys Primary School Walpole Highway Community Primary School Walsingham CE VA Primary School   | The Bawburgh School                  | Tunstead Primary School                    |
| The Clare School  The Compass – Belton Short Stay School For Norfolk  The Compass – Lingwood Short Stay  Walley Primary Academy  Walpole Cross Keys Primary School  Walpole Highway Community Primary School  Walsingham CE VA Primary School  | The Brooklands Short Stay School For | University Technical College, Norfolk      |
| The Compass – Belton Short Stay School For Norfolk  The Compass – Lingwood Short Stay  Walpole Cross Keys Primary School  Walpole Highway Community Primary School  Walsingham CE VA Primary School  | Norfolk                              |  |
| School For Norfolk The Compass – Lingwood Short Stay  Walpole Highway Community Primary School Walsingham CE VA Primary School   | The Clare School                     | Valley Primary Academy                     |
| The Compass – Lingwood Short Stay  Walsingham CE VA Primary School   | 1                                    | Walpole Cross Keys Primary School          |
| , , ,  | School For Norfolk                   | Walpole Highway Community Primary School   |
| School For Norfolk   | The Compass – Lingwood Short Stay    | Walsingham CE VA Primary School            |
|  | School For Norfolk                   |  |

#### OFFICIAL

| Watlington Community Primary School            |  |
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| Watton Westfield Infant & Nursery              |  |
| School   |  |
| Wayland Academy                                |  |
| Wayland Junior Academy Watton                  |  |
| Weasenham Church of England Primary            |  |
| Academy  |  |
| Weeting Primary School                         |  |
| Wells-Next-The-Sea Primary & Nursery<br>School |  |
| Wensum Junior Academy                          |  |
| West Earlham Infant & Nursery School           |  |
| West Earlham Junior School                     |  |
| West Lynn Primary School                       |  |
| West Raynham Church Of England                 |  |
| Primary Academy                                |  |
| West Walton Community Primary                  |  |
| School   |  |
| West Winch Primary School                      |  |
| Westfield House School                         |  |
| White Woman Lane Junior School                 |  |
| Whitefriars Church Of England Primary          |  |
| Academy  |  |
| Wicklewood Primary School and                  |  |
| Nursery  |  |
| Wimbotsham & Stow Academy                      |  |

| Winterton Primary School                     |  |
|--|--|
| Woodland View Junior School                  |  |
| Woodlands Primary Academy                    |  |
| Woodton Primary School                       |  |
| Wormegay Church Of England Primary<br>School |  |
| Worstead CE VC Primary School                |  |
| Wreningham VC Primary School                 |  |
| Wroughton Infant Academy                     |  |
| Wroughton Junior Academy                     |  |
| Wymondham College                            |  |
| Wymondham High Academy                       |  |
| Yaxham CE VA Primary School                  |  |
|  |  |