

Data sharing protocol for estimating rough sleeping

Why are we estimating the number of people sleeping rough?

All local authorities are required to submit an annual figure indicating the numbers of people sleeping rough in their area to the Ministry for Housing, Communities and Local Government (MHCLG) This methodology enables us to collect information on which to base our estimate.

In order to reach a figure to inform the estimate of the number of people sleeping rough on a specified 'typical night' between 1 October and 30 November, invited participants will be asked to provide basic details of people who are known to be sleeping rough locally (verbally in a meeting or by email using a password encrypted file). The local authority will use this information to arrive at a single figure and to collate numbers of women, men, under-18s, young people, and UK- or non-UK nationals. The information will be discarded subsequently.

A data sharing protocol is required to ensure that information can be shared in a way that complies with data protection legislation. Local authorities and their partners are each responsible for ensuring their compliance with data protection legislation.

Purpose of this protocol

This protocol template has been developed to support agencies to work with their local authority to come up with the most accurate estimate possible. Where a local protocol already exists, this should be used.

Data sharing protocol

This data sharing protocol has been agreed between the following Parties:

[names of participating agencies]

with the aim of clarifying and formalising data sharing arrangements, to provide a framework for the Parties to share information to accurately estimate the numbers of people rough sleeping in ***[name of local authority]*** on a typical night.

Each organisation party to this agreement is the data controller for the information it holds. If one organisation shares personal data with another organisation, each remains the data controller for the information in their possession.

The objectives of this protocol are to:

- a. Ensure that the rough sleeping estimate accurately reflects the numbers of people sleeping rough on the typical night chosen.
- b. Ensure that there is no double counting of the same individual and that rough sleeping is not over or under estimated in the local area.
- c. Ensure that the Parties are each clear about their data protection responsibilities.

- d. Promote trust between the Parties.
- e. Improve service delivery to individual service users by the Parties.

Information

This protocol will apply to the exchange of information between the agencies listed above with the aim of providing an accurate single figure estimate of people sleeping rough on one night. The information to be shared is:

- Last name
- First Name
- Date of Birth / Age
- Gender
- Nationality
- Agency involved
- Evidence that an individual was rough sleeping in the local area on the agreed typical night

Name and date of birth are not considered to be sensitive personal data, but the fact that an individual is sleeping rough and the evidence of this fact is considered to be.

Collection of information

As the data controllers, the organisations party to this agreement and involved in the estimation process are responsible for collecting personal information confidentially. It is up to them as data controllers to ensure procedures are in place to notify the data subjects that their information is being shared.

Use of information

All services must take responsibility for ensuring that information, which is shared under the terms of this Protocol, will only be used for the agreed specific purpose: to provide a framework for the Parties to share information to accurately estimate the numbers of people rough sleeping and submit a single figure and aggregated demographic data to the Ministry for Housing, Communities and Local Government (MHCLG) The information will be shared with the Local Authority and partners verbally in a meeting or by email using a password encrypted file. The local authority will use this information to arrive at a single figure and aggregated demographic data and discard the information subsequently.

A Homeless Link Quality Assurance Verifier will attend approximately ten percent of estimation meetings across England as part of the quality assurance process. The Homeless Link representative will not note any personal data and will treat all discussions as confidential.

As personal data is not shared with MHCLG, the Ministry is not a data controller in this agreement.

Information sharing without consent

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Individual agencies will have consent procedures with regard to sharing client details that we expect them to adhere to. In some circumstances, information will need to be shared without the consent of the individual. This should be considered in exceptional circumstances only as per schedule three of the Data Protection Act.

Data quality

Information discovered to be inaccurate or inadequate for the purpose will be notified to the data controller. As all data controllers are responsible for the accuracy of the data they keep; it is therefore also the responsibility of the respective data controller to rectify the accuracy of the data they keep.

Anonymised information

The information can be generally shared for purposes as defined in this protocol but only when it has been anonymised or aggregated.

Agreement by parties

Signed..... Dated.....

On behalf of _____

Signed..... Dated.....

On behalf of _____

Signed..... Dated.....

On behalf of _____

Signed..... Dated.....

On behalf of _____

Signed..... Dated.....

On behalf of _____

Signed..... Dated.....

On behalf of _____



| First name or initial | Last name | DoB / Age 18 / 18- 25 / 26+ / not known* | Gender male / female / not known or not disclosed* | Nationality UK national / non-UK / not known* | Rough sleeping location | Evidence that the individual was rough sleeping on the agreed 'typical' night [insert date using format night of x into morning of x] | Other agencies working with individual |
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