

**Consultation on the Northern Ireland Information Sharing Agreement for  
Safeguarding Children  
Response from Fermanagh and Omagh District Council.**

Fermanagh and Omagh District Council (Council) welcomes the opportunity to respond to the above consultation.

Council believes that it is always unacceptable for a child or vulnerable person to experience abuse or harm of any kind and recognises its responsibility to safeguard and promote the welfare of all children, young people and vulnerable adults by a commitment to a practice that protects them as far as is reasonably practicable.

Council welcomes the introduction of a formal Information Sharing Agreement but has some concerns in relation to both the content of, and the requirement to complete, the Governance Checklist prior to engaging in Information Sharing activities. Council has concerns about the content of the Governance Checklist, particularly in respect of it meeting the proportionality test of better regulation principles i.e. providing appropriate information to, and protection for, service users and agencies whilst at the same time minimising the costs of compliance for agencies. For example the question “Are you aware of your duty of care to employees, volunteers, service users in terms of health and safety?” suggests Evidence Indicators including fire alarms, extinguishers and First Aid.

In relation to the Governance Checklist, Council would also have concerns that “applications to share information will be considered by the Board on a once yearly basis.” If a new agency is created, the time frame to complete the checklist and have it approved, could result in critical time delays in the referral of incidents or potential incidents of harm to children.

**Conclusion.**

The completion of the SBNI Compliance Audit by all relevant agencies already provides assurance to the Board in relation to the effectiveness of the operation of their functions in relation to safeguarding, and includes sections on Effective Inter- Agency working and Effective Information Sharing Agreements.

Consequently, Fermanagh and Omagh District Council believes that the Information Sharing Agreement itself, when signed by the relevant senior person (Chief Executive in the case of Local Councils) should provide adequate assurance that the relevant Agency is committed to upholding the principles outlined, including a commitment to “comply with all relevant legislation and guidance”. Participation in Information Sharing Arrangements should not be predicated on the completion of a Governance Checklist.