

Privacy Notice

Working Well Specialist Employment Service

(21.07.21) Version 3

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Privacy Notice

What is the Working Well Specialist Employment Service?

Working Well Specialist Employment Service (Working Well SES) has been set up to help hundreds of people like you improve their lives. You may have been referred by your NHS Trust or Local Authority, because they think this programme could help you with the obstacles you are experiencing that have led to you being off work or unemployed.

If you join the Working Well SES programme you will have an Employment Specialist who will work with you for up to 13 months for Individual Placement and Support or up to 18 months for Supported Employment.

The service provided can support you to get back to work and get you support with things that will help prevent you from falling out of work (for example mental or physical health problems). Your Employment Specialist will work with you to help you to plan your journey back to work. Their support could include anything from workplace adaptations to support and advice on your lifestyle and health condition in relation to work.

Who is providing the Working Well Specialist Employment Service?

We are delivering this service on behalf of the Greater Manchester Combined Authority (GMCA) and Greater Manchester Health and Social Care Partnership (GM HSCP) through our offices, community hubs and locations. The Specialist Employment Service is part of GMCA's Working Well Care and Support for local residents. It tackles unemployment and poverty in the area through Supported Employment and Individual Placement and Support.

GMCA is required to provide many different types of support for the people that live in Greater Manchester. Different laws instruct them to do this. These allow GMCA to use your information to provide these services and share your information as needed for the successful delivery of these services. By safely using your information and working together we can give better and more joined up support to help you get back to work.

To do this, GMCA have commissioned Remploy to provide the Working Well SES programme. Remploy will also be asking you for information to help them provide the services you need and help GMCA evaluate the programme. Remploy will work on behalf of GMCA to identify and provide you with the support you need to get back to work.

Under the General Data Protection Regulation and Data Protection Act 2018 (the 'Data Protection Laws'), both GMCA and Remploy would be considered controllers. 'Controller' is the term used for the organisation who is responsible for handling your personal data. You can see below who the controller is and their responsibilities for the information you provide to them under Working Well SES, as well as how your information is used and shared as part of the programme.

How will your information be used?

Your Employment Specialist will do some assessments and ask you some questions about yourself. They will also keep notes about how you are progressing and what you have discussed. They will share some of this information with the NHS Trust or Local Authority that referred you onto the programme. Your information will only be shared with those that need to know and only for the purposes we explain here.

Getting support from your Employment Specialist will help you overcome any barriers you face getting back to work. With your Employment Specialist and the other organisations sharing information, it will make it easier to get support. This ensures that you get the right support at the right time for you and reduces the number of times you have to explain and share the same information about yourself.

When your information is shared to help you on the programme, it will only be used on a “need to know” basis. Only the minimum amount necessary is shared to support your access to services.

As well helping you get the services you need, your information will also be used in other ways to support Working Well:

- Your information will also be used to improve the programme and similar programmes as part of the evaluation process. The evaluation of this programme will help us to understand if the service actually works the way we want it to. Being able to use your information like this really helps make programmes like this better. The information used for these purposes will not be identifiable (i.e. will not include your name). You can find out more details about the research and evaluation work further in the *What sort of sharing will happen?* section.
- The provision of the programme has been part funded by the European Social Fund. To make sure that the funds are being used properly, an audit is undertaken of the programme and the people receiving support. This may involve some of your information being shared with the auditor. You can find out more details of how your information will be used to support the European Social Fund audit in the section below
- Your information will also be used to make sure the services are being provided in the way the GMCA contract states, including auditing and accounting processes for financial purposes.

What do we do to make sure your information is secure?

All the information you provide as part of this programme will be kept securely. Remploy are required as part of their contract to keep your information safe. Remploy will hold the information on secure servers in line with security best practice and will comply with a number of information security standards as well. We want you to know that your information will be subject to strict measures and procedures to make sure it can't be seen by anyone who shouldn't see it.

The protections that are in place include:

- All staff have to comply with Information Security policies and procedures. These set out how your information is protected by using technology
- All laptops are encrypted and will need a unique logon password and ID to be able to get onto the computer systems
- All non-moveable computers also need a unique logon password and ID to be able to get onto the computer systems
- The servers that your information is stored on are encrypted and protected to strict international standards
- Limiting access to your information by the role of the person. That means if they are not the right specialist in the right team of people, they will not be able to see your information
- Staff will have undergone employment checks
- All staff receives specific training around how to handle information properly
- Any data transfer will be secure, for example, using encryption.

How long will we keep your information?

Each organisation involved in providing Working Well SES must keep your information for a set period of time to comply with different laws, regulations and guidance. To make sure this is done properly they each have policies that list the length of time they will hold information.

There may be times where laws do not specify how long information must be kept for. When this happens, we will use recommendations from legal advisors. We will also work with other specialists to decide how long it is necessary to keep it for. All decisions that are not based on legal requirements need to be justified.

The information that Remploy collects as part of you taking part in Working Well SES will be kept until 2034 for European Social Funding Auditing and for internal financial auditing and accounts. After this time the information will be securely destroyed.

The information that is produced for the evaluation process will be held as statistical reports only. This information would not allow individual people to be identified from it.

Any of the organisations that refer you to the programme or you work with as part of the programme for health support will advise you separately about how long they will hold your information.

Information Rights

Under data protection laws, you have various information rights. These include:

- Requesting copies of your information
- Raising concerns if you think your information is not being used properly
- Making sure your information is accurate and up to date
- Objecting to how your information is being processed.

We'll try our best to fulfil your request, but there may be some situations where we will not be able to do this in full. For example, where information relates to other people.

When requesting your personal information you will be asked to provide the following information:

- Your full name, address and contact telephone number
- Any information used by the organisation to identify or distinguish you from others of the same name (account numbers, unique identifiers etc.)
- Details of the specific information you require and any relevant dates, for example, your Working Well SES file.

The Information Commissioner's website (<https://ico.org.uk/for-the-public/>) has more details about your rights when asking for your information. They also have a template letter for you to use.

If you feel your information is not being used appropriately, please raise your concerns with your Employment Specialist or their manager.

If you are not comfortable doing this you may email MAXIMUS Data Protection at:

dataprotection@maximusuk.co.uk

Alternatively, you can raise your concern by writing to:

Remploy Data Protection Team
18c Meridian East
Meridian Business Park
Leicester
Leicestershire
LE19 1WZ

When contacting the data protection team, please explain what your specific concern is in relation to the use of your information for Working Well SES.

Using Your Information

Overview

As someone that is taking part in Working Well SES, Remploy will have access to your information for different reasons. Each time you meet your Employment Specialist they will ask you some questions about yourself and keep records of the services and support you receive. This is to help us ensure that the services and support we are providing are helping you and are having a positive impact. All of this information is held securely in your records.

Your Employment Specialist can then use this information when working with you. They will use it in different ways to work out the most relevant and effective support for you. This will involve, where needed, sharing information with the other organisations' involved in supporting you. It could also be sharing to speed up your access to support. It is important to ensure that the right people have access to the right information at the right time so they can provide you with the right support.

Delivery of Services

To support the delivery of this service, Remploy will use information for any of the following purposes:

- The provision of employment support services
- Supporting and managing our employees
- Corporate administration and all activities we are required to carry out as a Controller
- Internal financial support and corporate functions
- Public health purposes
- Investigating complaints
- Maintaining our own accounts and records
- Promoting the services we provide
- Supporting internal and European Social Fund (ESF) audits
- Prevention of fraud and crime

Sharing Your Information

Why will we share your information?

Working Well SES is meant to provide you with the support you need to help you get back to work. To do this a number of different organisations have to work together. Your Employment Specialist will help coordinate this. To do it properly they will need to know the services you are accessing at the moment, along with any support you received previously and information about how your health issues are affecting you. This provides your Employment Specialist with a good idea of your overall situation.

By sharing information, it will prevent you having to explain yourself repeatedly, making sure support is coordinated to suit you.

What sort of sharing will happen?

When you are referred onto the programme by your NHS Trust or Local Authority, they will provide your Employment Specialist with some brief information so they can contact you and get the best support for you. This will include:

- Contact information
- Very brief details of your condition or illness
- Anything that Remploy may have to adapt to provide the most appropriate service for you

During, and at the end of, the programme, it may be appropriate to share information with your employer. Where we do, we will only do so with your consent.

Once the support you have accessed comes to an end, your Employment Specialist will share information with the organisation who referred you, to let them know:

- If you got a job and what that job is
- If you will need some further support now you are not on the programme
- If you have completed the programme or have left early
- If you have been referred to any other services and if they have made any relevant recommendations

An important part of any programme like Working Well SES is making sure that it is actually doing what it needs to do. This includes evaluating how the services provided helps the people taking part. Being able to do this research is useful because it allows improvements to the programme and similar programmes across Greater Manchester.

Remploy will supply information to GMCA to carry out the research and evaluation of the programme; including information about your health in order to get a better understanding of the impact of the programme; supporting the programme audit; and enabling financial payments to be made. You will not be identifiable from this information. GMCA has produced a list of the information they will use for this – it is available on our website page as the Performance and Evaluation Framework (PEF).

The research will produce anonymised statistical data from your information. This means where this evaluation information is shared with others (including as part of publicly accessible reports), you will not be identifiable. Neither we nor others will use this evaluation data to make any decisions about you; it will only be used for improving the quality, effectiveness and delivery of help across Greater Manchester.

For Individual Placement and Support (IPS), Remploy will share data with NHS Digital, using the Mental Health Services Dataset (MHSDS). This includes information about employment status, weekly hours worked, and delivery of the IPS intervention. The MHSDS is a patient level, output based, secondary uses data set which delivers robust, comprehensive, nationally consistent and comparable person-based information for children, young people and adults who are in contact with Mental Health Services.

Detecting and preventing fraud or crime

By law GMCA has to protect the public funds they are responsible for. This means they will also use any of the information provided to them to prevent and detect fraud. This may involve sharing this information with organisations responsible for auditing or administering public funds including the Audit Commission, the Department for Work and Pensions, local authorities, HM Revenue and Customs, and the Police.

GMCA will also take part in national data matching exercises undertaken by the Audit Commission where this is allowed under Data Protection laws.

When necessary and appropriate, information held will be shared with organisations such as the Police to prevent or detect crime, apprehend or prosecute offenders or prevent the risk of harm to an individual.

European Social Fund

Overview

To provide Working Well SES, GMCA has obtained money from different places. One of those places is from the European Social Fund (ESF). One of the conditions of this backing is that GMCA must provide some information about the people that go on the programme, to show that they are the right people for the programme and that actually received support.

When you first speak with your Employment Specialist you will be told if the programme has ESF support and you may be given a leaflet explaining what this means if this applies to you. You will be asked to provide some information to help fill out an ESF form and be asked to sign that you have been given the leaflet and that you understand that this information will be stored and used for ESF purposes.

Both GMCA and Remploy must be checked and reviewed as part of the ESF audit process. The checks that will happen use random test groups. This means that your information might be used to help with these checks.

These checks make sure the money ESF has given GMCA is being spent on what it is meant to be. GMCA and Remploy have to show that you have received the support required as part of the programme.

These checks will include

- Eligibility of participants
- Compliance with Community and National rules
- Compliance with document retention requirements/standards
- Confirmation that expenditure declared corresponds to accounting records and supporting documentation held
- Whether your provision meets the selection criteria and objectives of the programme.

The checks will be carried out by the ESF Managing Authority, the ESF Certifying Authority and the ESF Audit Authority.

More details are available on the processes that are required for the European Social Funding here: <https://www.gov.uk/government/publications/european-structural-and-investment-funds-programme-guidance>.

Using Your Information

Legal grounds for use

The Data Protection laws require us to have a valid lawful basis to use your personal data and to tell you what that basis is as stated in the legislation.

All the organisations involved will use the information you provide in different ways.

Please see the following table showing the lawful bases as set out in the General Data Protection Regulation (GDPR), under which organisations are using your personal data for Working Well SES.

Referral process from NHS Trust or Local Authority for access to the Programme

Referring Organisation	Category of data	GDPR lawful basis – Personal Data	GDPR lawful basis – Special Category Data
NHS Trust	<ul style="list-style-type: none"> Contact details Primary reason for referral 	Article 6(1)(a) – Consent	Article 9(2)(a) – Explicit Consent
GM Local Authority	<ul style="list-style-type: none"> Contact details Primary reason for referral 	Article 6(1)(e) – Task carried out in the Public Interest	Article 9(2)(g) – Necessary for reasons of Substantial Public Interest.

Referring Organisation	Category of data	GDPR lawful basis – Personal Data	GDPR lawful basis – Special Category Data
Remploy	<ul style="list-style-type: none"> Contact details Primary reason for referral 	Article 6(1)(e) – Task carried out in the Public Interest	Article 9(2)(b) processing is necessary for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection.

Programme participation

Partner	Category of data	GDPR lawful basis – Personal Data	GDPR lawful basis – Special Category Data
Remploy	<ul style="list-style-type: none"> Contact details Skills and training needs Health and Care needs Personal issues Barriers to work 	Article 6(1)(e) – Task carried out in the Public Interest	Article 9(2)(b) - processing is necessary for carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.

Programme participation – Sharing of data from Remploy to others

Receiving Organisation	Category of data	GDPR lawful basis - Personal Data	GDPR lawful basis – Special Category Data
NHS Trusts / Local Authorities that have referred participants	<ul style="list-style-type: none"> Contact details Non-clinical data – progress / exit updates 	Article 6(1)(a) - Consent	Article 9(2)(a) – Explicit Consent
Participant employer	<ul style="list-style-type: none"> Contact details Non-clinical data – progress / exit updates 	Article 6(1)(a) - Consent	Article 9(2)(a) – Explicit Consent.

Evaluation, Research, Finance and Auditing - Sharing of data from Remploy to others

Receiving Organisation	Category of data	GDPR lawful basis - Personal Data	GDPR lawful basis – Special Category Data
GMCA	<ul style="list-style-type: none"> Contact details Health and Care diagnoses Personal issues Barriers to work 	Article 6(1)(e) – Task carried out in the Public Interest	Article 9(2)(g) – Necessary for reasons of Substantial Public Interest.

Mental Health Services Dataset – IPS only

Receiving Organisation	Category of data	GDPR lawful basis - Personal Data	GDPR lawful basis – Special Category Data
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NHS Digital	<ul style="list-style-type: none"> Contact details Health and Care diagnoses Non-clinical data – progress / exit updates 	Article 6(1)(e) – Task carried out in the Public Interest	Article 9(2)(g) – Necessary for reasons of Substantial Public Interest.
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Individuals at risk

If we identify that any individual on Working Well SES or their family is at risk, we may need to process additional information – including sharing information with other statutory authorities – to make sure everyone is kept safe and well.

Partner	Category of data	GDPR lawful basis – Personal Data	GDPR lawful basis – Special Category Data
All	<ul style="list-style-type: none"> Information identified by a professional as necessary 	Article 6(1)(d) processing is necessary in order to protect the vital interests of the data subject	Article 9(2)(c) processing is necessary to protect the vital interests of the data subject where the data subject is physically or legally incapable of giving consent.

Where any organisation relies on your consent as the lawful basis to use your personal data, you are under no obligation to provide information. You can withdraw your consent at any time; however you need to be aware that this may affect the way we provide Working Well SES to you.

For more details about valid reasons for processing please visit the Information Commissioner’s Office: <https://ico.org.uk/your-data-matters/does-an-organisation-need-my-consent/>.

Contact us

Please find below our contact details, if you need to get in touch with us about Working Well SES:

Greater Manchester Combined Authority (GMCA)

Website: www.greatermanchester-ca.gov.uk/
 Telephone: 0161 778 7000
 Email: enquiries@greatermanchester-ca.gov.uk

Remploy Working Well Specialist Employment Service

Website: www.remploymail.co.uk/WWSES
 Telephone: 0300 456 8136
 Email: workingwellSES@mail.remploymail.co.uk