

Wise Steps Privacy Notice: Collection and use of personal information

Introduction

Wise Steps is one of several Building Better Opportunities projects funded by the National Lottery Community Fund (NLCF) and the European Social Fund (ESF). NLCF and ESF are investing in local projects tackling the root causes of poverty, promoting social inclusion and driving local jobs and growth. The European Commission decides how ESF money must be managed, spent and evidenced. The Department for Work and Pensions (DWP) is the ESF Managing Authority in England meaning they are responsible for administering the ESF funds across England.

This privacy notice describes how your personal information is collected and used in accordance with [Regulation \(EU\) 2016/679](#) (General Data Protection Regulation – GDPR) and [Data Protection Act 2018](#) (DPA18). This notice does not form part of any contract of employment or another contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably possible.

Who we are

The Wise Group is the lead organisation for the Wise Steps project and we are responsible for the funding received from NLCF and ESF. We also deliver the Wise Steps project along with our subcontracted delivery partners (project partners). Wise Steps helps people in Tyne and Wear to change their lives through work - we provide people with individualised support to help them take positive steps towards employment.

Personal data

Personal data means any information about an individual from which that person can be identified. It does not include data where the identity has been

removed (anonymous data).

For the purposes of GDPR, the DWP is the data controller in respect to information processed which relates to all participation in the European Social Fund. ESF grant beneficiary organisations are data processors in respect to information processed which relates to participants in the operations and projects funded by the European Social Fund. DWP is not the controller for any other / additional data collected by us that is not essential for delivering the ESF programme, or for any personal data that would normally be collected anyway by us.

We will collect other / additional data about you which is specific to the Wise Steps project (as opposed to the ESF programme). The Wise Group is the data controller for additional information that we may need to deliver Wise Steps but are not strictly required for ESF participation. Our subcontracted project partners are data processors.

The additional information we collect allows us evidence that that local Building Better Opportunities provision (Wise Steps) is tailored to meet the specific needs and priorities of Tyne and Wear and its residents. It helps us to better understand and assess your circumstances, needs and aspirations, and use this information to agree and deliver the best form of support to help you meet these needs. Specifically the additional information we collect includes:

- Whether at the time of enrolment you:
 - reside in the 20% most deprived areas in England (we will process this based on a check of your residential postcode against the official Index of Multiple Deprivation);



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- are a lone parent (which you can choose not to answer);
- are an unpaid carer or care leaver (which you can choose not to answer);
- your sexual orientation (which you can choose not to answer); and
- whether you have any addiction issues with drugs or alcohol (which you can choose not to answer).
- Information about your friendships, relationships and other forms of networks as an indicator of social inclusion.
- Assessments on factors related to employment at regular intervals throughout participation.
- Your perception of the support provided to you.

The purposes for which personal data is processed

We use personal information about you to deliver the Wise Steps service and monitor your progress and the project’s success. Specifically we will: assess your eligibility using guidance from NLCF and ESF; conduct risk assessments; assess your personal support needs; develop and agree a tailored action plan and activities to support your progress towards employment; and monitor your progress and achievements.

We may use your personal data to generate statistics or produce case studies to help us evaluate or demonstrate the impact of the Wise Steps project. We may share these statistics and case studies with third parties with an interest in the programme, such as NLCF or the Local Enterprise Partnership. In these cases, we will not disclose your personal information unless you provide us with consent to do so.

We may also use your personal data to share with other Wise Group services and departments that can provide additional support to help you to meet your goals or improve your personal circumstances.

The information you provide to Wise Steps will be shared with the DWP and used to evaluate the project and to report to ESF for monitoring purposes, in line with European Commission regulatory requirements. Your information will also be shared with research organisations working on behalf of DWP who may contact you to discuss your involvement in the project for research purposes. Participation in research is voluntary and you will be asked to consent before taking part in any research activity you may be contacted about.

The DWP may also link your personal details to official administrative records in order to monitor your employment status before your ESF support began and 6 to 12 months after you left. This information may also be shared with research organisations working on behalf of the DWP however individuals will not be identifiable and you will not be contacted about this research. Data will not be used or shared for any commercial or marketing purposes. At all times your information will be kept securely, and nobody will have access to it that shouldn’t.

The lawful grounds for the processing

The ESF Programme Action Note 018/18 sets out the lawful basis for processing personal data under ESF. It states that The DWP ESF Managing Authority processes personal data in the ESF programme under:

- Article 6 (1) (e) of the GDPR: ‘processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller’.
- Article 9 (2) (b) of the GDPR: ‘processing is necessary for the purposes of 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 in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropri-



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ate safeguards for the fundamental rights and the interests of the data subject’.

The lawful grounds we have for processing your data are:

- **Consent** – if you agree to the specific data processing activities described above you will be asked to provide your consent in writing. Your consent is freely given, and you are not obliged to provide it for participating in the New Routes programme. New Routes is based on your voluntary participation. You have the right to withdraw your consent at any time. The withdrawal of your consent will not affect the lawfulness of processing based on consent before its withdrawal. If you withdraw your consent, we may not be able to provide certain services to you. We will advise you if this is the case at the time you withdraw your consent.
- **Legitimate Interests** – We may rely on the Legitimate Interests of the Wise Group (or those of a third party) to use your personal data to inform you of additional support services available to you through the Wise Group to enhance the support provided by New Routes. Legitimate Interest means our interest in conducting and managing our activities and projects to enable us to give you the best service and experience. We consider and examine any potential impact on you and your rights before we process your personal data for our legitimate interests to ensure that those interests do not override your interests and fundamental rights. You can obtain further information about how we assess our legitimate interests against any potential impact on you in respect of specific activities by contacting us.

How do we collect this data?

We will collect information from you directly.

How long do we keep your data?

Personal data held by DWP for all other ESF purposes as required by European Commission regulations will be retained in line with the current guidance on GOV.UK at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/591617/ESF_Guidance_on_document_retention.pdf. All personal data held by DWP or research contractors for the purposes of evaluation will be permanently deleted no more than six months after the research has been completed (i.e. when the final report is published on GOV.UK).

The information we collect will be kept until the completion of the programme and of any legal and audit purposes. More specifically, we will retain your personal data until 31 March 2034 unless otherwise instructed by NLCF, the DWP ESF Managing Authority or the European Commission. Following this period, we completely and irreversibly erase your personal data, unless we are required by law to do otherwise.

Sharing your personal data

We will share your personal data with third parties where required by law, where it is necessary to administer our relationship with you or where we have another relevant, carefully assessed legitimate interest in doing so. We will not disclose your personal information to third parties unless there is a lawful ground for this. We will not share your personal information for marketing purposes unless you consent to this processing.

Personal information held by the Wise Group may be shared with other governmental organisations and departments to enable them to exercise their statutory duties as required by law. These third parties include:

- The DWP ESF Managing Authority and NLCF for monitoring, evaluation and audit purposes.
- Potential employers and education or training providers to match you with



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suitable opportunities and further your employability skills.

- Additional support organisations who can provide more support to help you meet your goals or improve your personal circumstances (e.g. housing associations, local authorities, health providers, addiction services, financial support services, relationship support organisations, and agencies responsible for administering benefits).
- Subcontracted organisations to conduct independent evaluation of the programme.

We also use data processors who provide services to us. We have contracts and data processing agreements in place with our data processors, which ensure that the data processors are responsible for complying with data protection law. Our Data Processors include:

- Subcontracted project partners responsible for delivering coaching activity.
- Subcontracted project partners responsible for delivering specific specialist activities to support you with complex needs such as health conditions.

Your rights under data protection law

The rights that you have depend upon the grounds upon which we have collected your information. Under the GDPR and DPA18, you have the following rights:

- *Right to object*, i.e., if you ask us to stop processing your personal data, we will stop doing so unless we can demonstrate compelling grounds as to why the processing should continue in accordance with data protection law;
- *Right of access*, i.e., to receive confirmation as to whether your personal data is being processed, as well as to receive a copy of your personal data;
- *Right to rectification*, i.e., to require us to rectify any inaccurate personal data we hold about you;
- *Right to restrict processing*, if you contest the accuracy of your data

and the lawfulness of processing but do not request such data being erased;

- *Right to data portability*, i.e., to receive your personal data in a structured, standard machine-readable format to transmit such data to another controller;
- *Right to erasure*, also known as the right to be forgotten, i.e., to request that we delete the data we hold about you;
- *Right to withdraw consent*.

You also have the right to lodge a complaint with the Information Commissioner's Office. If you wish to exercise any of these rights, please contact our Data Protection Officer using the contact details below.

If you do not wish your personal data to be used for ESF evaluation purposes please contact:

ESF.EVALUATIONS@DWP.GSI.GOV.UK

who will delete your data held for these purposes and you won't be contacted about participating in research.

Fees policy

You will not have to pay a fee to access the personal data we hold about you or exercise any of the other rights. However, we may charge a reasonable fee for the administrative costs of complying with the request if your request is clearly unfounded, repetitive or excessive. We try to respond to all requests and queries within one month. Nonetheless, it could take us longer than a month if your request is particularly complex. In this case, we will keep you updated. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data. We may also contact you to ask you for further information in relation to your request to speed up our response.

Do you want to know more?

- For more information about the Wise Group's commitment to data protection, your rights under data protection law, our fees policy or how to contact

our Data Protection Officer please read our Privacy Notice Supporting Information document, available on our website (<https://www.thewisegroup.co.uk/>).

- If you have any questions or concerns about we use your information, please contact the Wise Steps Manager on 0191 242 4898. You can also contact our Data Protection Officer using the contact details below.
- More information about how and why DWP uses your personal information, including how to ask for a copy of the personal information DWP holds about you can be found in DWP's Personal Information Charter at: <https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>
- Information about how to ask for a copy of the information DWP holds about you (known as a 'Right of Access Request') can be found at: <https://www.gov.uk/guidance/request-your-personal-information-from-the-department-for-work-and-pensions>
- More information about data protection and how it applies to you can be found on the [Information Commissioner's Office website](#).

About this privacy notice

We keep our privacy notices under regular review. This privacy notice was last updated 2 July 2019. We want to hear from you and keep your data safe, accurate and complete. Please keep us informed about any changes regarding your personal data during your relationship with us.

The contact details of our Data Protection Officer

Should you have any queries or concerns regarding your personal data, or wish to exercise any of your rights, then please contact our external Data Protection Officer, Trilateral Research using the information below.

Email:

dataprotection@thewisegroup.co.uk

Telephone:

+ 44 (0) 20 70528289

Post:

Trilateral Research
One Knightsbridge Green
London
SW1X 7QA



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