

Privacy Notice

NHS Pennine IPS Contract



Delivered in Partnership by Pure Innovations, The Growth Company and PossAbilities

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Who is providing the Individual Placement and Support service?

The Individual Placement and Support (IPS) service is led by Pure Innovations in partnership with The Growth Company and PossAbilities. The Commissioner of the service is NHS Pennine.

What is the NHS Pennine IPS Contract?

The service aims to assist Greater Manchester residents recovering from Serious Mental Illness (SMI) in finding and maintaining employment. Its primary goals include promoting independence, enhancing self-esteem, and facilitating integration into the workforce. IPS operates by providing personalised support tailored to each individual's needs, preferences, and abilities.

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 NHS Pennine. 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.

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. Pure Innovations, The Growth Company and PossAbilities are required to keep your information safe. To do this we comply with a number of information security standards. 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 Individual Placement and Support 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 NHS Pennine, Pure Innovations, The Growth Company and PossAbilities collect as part of you taking part will be kept until for 8 years from the end of contract (31/03/27 +8 years)

Information Rights

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

Under UK GDPR, you have the following rights regarding your personal data:

- The right to access your personal data
- The right to rectify inaccurate or incomplete data
- The right to erase your data (right to be forgotten)
- The right to restrict processing
- The right to data portability
- The right to object to processing
- The right to withdraw consent at any time

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

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.

Pure Innovations, The Growth Company and PossAbilities act as joint data controllers for the Individual Placement and Support (IPS) service commissioned by NHS Pennine.

Each organisation is responsible for ensuring your information is handled lawfully, fairly and securely. If you feel your information is not being used appropriately, please raise your concerns with your Employment Specialist or their manager.

You can also contact any of the organisations' Data Protection Officers if you have questions about how your information is used.

Pure Innovations – Liam.Doran@pureinnovations.co.uk, 07802 492019

The Growth Company - DPOfficer@growthco.uk, 07731 326 309

PossAbilities – Amanda.higgs@possabilities.org.uk, 07980736363

If you are not satisfied with the response. You have the right to make a complaint to the Information Commissioner's Office (ICO).

You can contact the ICO using the following details:

- Website – www.ico.org.uk
- Helpline – 0303 123 1113
- Postal address – Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF

Using your Information

As someone that is taking part in the programme Pure Innovations, The Growth Company and PossAbilities 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.

To support the delivery of this service Pure Innovations, The Growth Company and PossAbilities will use information for any of the following purposes:

- The provision of health care services
- Supporting and managing our employees
- Corporate administration and all activities we are required to carry out as a Controller and public authority
- Internal financial support and corporate functions
- Public health purposes about patients or healthcare
- Investigating complaints
- Maintaining our own accounts and records
- Promoting the services we provide
- Prevention of fraud and crime.

Sharing your information

Individual Placement Support service is meant to provide you with the support you need to help you get back to work. To do this several different organisations have to work together. Your Employment Specialist will help co-ordinate this. To do it properly they will need to know the services you are accessing currently, 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

As part of this contract, we are required to share information about you with IPS Grow (Individual Placement Support) and NHS MHSDS (Mental Health Services Data Set). We share certain information because it is required for the delivery of health and social care services. This type of sharing is carried out under health and social care legislation and is necessary for the proper management of NHS funded services. Data is shared securely and Identification Numbers known as PER Numbers are shared, not full names. If you have any concerns about this, please liaise with your Employment Specialist.

Surveys, responses and feedback

We may collect personal information when you respond to surveys, consultations, or provide feedback about our services. This information is used to help us review, improve, and quality-check our services.

If you have questions about surveys, wish to provide feedback, or would like to know how your responses are used, please contact our Data Protection Officer using the details provided in this notice.

Use of AI tools for meeting administration

We may use digital tools, including AI-supported note-taking or “magic notes”, to assist with the administration of meeting notes. These tools are used to support accuracy, efficiency, and record-keeping only.

Meeting notes generated in this way are reviewed by staff, stored securely, and handled in line with our data protection obligations. AI tools are not used for automated decision-making about individuals.

Legal grounds for using your information

We only process personal data where we have a lawful basis under data protection law. This may include where:

- you have given us consent;
- the processing is necessary for a contract with you;
- we are required to comply with a legal obligation; or
- we have a legitimate business interest in processing the data and your rights do not override those interests.