



**WOKINGHAM
BOROUGH COUNCIL**

Privacy Notice Connect to Work

This notice, in conjunction with Wokingham Borough Councils overarching privacy statement, explains when as a service we collect personal information, what we use your data for, who has access, who we share it with, and what your rights are.

Connect to Work is a voluntary employment programme to help disabled people, those with health conditions, and those with complex barriers into sustained employment. By connecting people to work, the programme aims to foster independence, strengthen communities, and build a more inclusive workforce for all.

Who are we?

Wokingham Borough Council is the Accountable Body for the Berkshire area in relation to Connect to Work. This programme will be for the Berkshire Local Authorities (Bracknell Forest Council; Reading Borough Council; Royal Borough of Windsor and Maidenhead; Slough Borough Council; Wokingham Borough Council; and West Berkshire Council)

Wokingham Borough Council have completed a procurement process and awarded the contract to Palladium International Limited. Palladium International Limited (Data Processor) will be responsible for delivering the Connect to Work programme across Berkshire on behalf of the Local Authorities.

The contractor's role is to provide tailored, one-to-one employment support to eligible individuals, helping them overcome barriers to work and achieve sustainable employment. This involves managing referrals, conducting initial assessments, developing personalised support plans, coordinating access to training and health services, and supporting participants throughout their journey into work and beyond.

What is the lawful basis for processing the information?

The lawful basis for processing your information is the performance of a task carried out in the public interest under Article 6(1)(e) of GDPR; and the processing is necessary for the completion of a contract under Article 6(1)(b) of GDPR for Palladium International Limited.

For Special Category Data will be processed in accordance with Article 9(2)(b) UK GDPR (employment, social security and social protection law) and Article 9(2)(g) UK GDPR (substantial public interest).

Using the model of Supported Employment, Connect to Work will be funded through Department for Work and Pension grants and Integrated Settlements awarded to 49 Accountable Bodies (Local Authorities and their delivery partners). Wokingham Borough Council is the Accountable Body for the Berkshire area, with Palladium International Limited fulfilling the operational matters.

Delivered locally, the programme offers up to 12 months of personalised, one-to-one support from employment specialists who understand each participant's unique challenges and strengths. Whether someone is unemployed or at risk of leaving their job, Connect to Work provides tailored coaching, access to training, and ongoing in-work support, empowering individuals to build confidence, develop skills, and achieve their employment goals. The

programme integrates employment, health, and skills support, working closely with local services and employers to create inclusive opportunities.

Participation is free, and eligibility extends to adults with disabilities, long-term health conditions, or other complex barriers, including carers, ex-offenders, veterans, care leavers, refugees, and more. By connecting people to work, the programme aims to foster independence, strengthen communities, and build a more inclusive workforce for all.

How do we collect information from you?

The contractor's role is to provide tailored, one-to-one employment support to eligible individuals, helping them overcome barriers to work and achieve sustainable employment. This involves managing referrals, conducting initial assessments, developing personalised support plans, coordinating access to training and health services, and supporting participants throughout their journey into work and beyond.

To fulfil these responsibilities effectively, the contractor must collect and process personal information about participants; such as contact details, eligibility criteria, health and employment status, and support needs. This information is essential for ensuring that support is appropriately targeted, progress is monitored, and outcomes are reported accurately.

What type of information is collected from you?

Where necessary and proportionate, the categories of data to be collected and shared is:

- (a) identifying information (name, date of birth, address, postcode);
- (b) contact details (telephone, email);
- (c) programme reference numbers and eligibility status;
- (d) employment status, outcomes and sustainment information;
- (e) case management notes and support plans;
- (f) referral and engagement information;
- (g) safeguarding concerns where relevant; and
- (h) equality and monitoring data, including health or disability information where required.

All parties to this programme will ensure data minimisation at all times. Any other personal information that will be transferred to the other parties (unless to fulfil a legal obligation such as safeguarding), will be carried out with consent of the Data Subject where they are fully informed of required data sharing.

How do we use the information you have provided?

We use your personal data to deliver the Connect to Work Programme and ensure you receive the right support at the right time. This includes confirming your eligibility for the programme, understanding your needs, managing referrals, and providing personalised one-to-one employment support.

We also use your information to monitor progress, record outcomes, meet our legal and contractual obligations, safeguard adults and children where necessary, prevent fraud, and evaluate how well the programme is working. These activities allow Wokingham Borough Council, acting as the Accountable Body, and its partner authorities to run the programme effectively, transparently, and in the public interest.

Who has access to the information about you?

Your information is managed by staff within their respective Local Authority who deliver the Connect to Work Programme.

Your information will be shared with Palladium International Limited to enable them to carry out the Connect to Work service that they have contracted for. Information will also be supplied by Palladium International Limited to the local authorities to aid in monitoring and delivery of the contract.

Wokingham Borough Council will use your information to provide statistical data to Connect to Work programme board who will be monitoring the provision and also as required to the Department for Work and Pensions to demonstrate work being undertaken for this programme. It is the intention that statistical data should be anonymised, but if requested by the Department for Work and Pension (who fund this programme), personal data will be provided to fulfil the Councils obligations with them.

IT staff across the organisations will have access to the information as necessary to support from a technical or system perspective.

Who we may share your information with?

Information will be shared between Palladium International Limited and the Local Authorities (who act as joint controllers under the UK GDPR) to ensure the programme is delivered safely, lawfully, and in line with agreed standards. Sharing information enables robust case management, safeguarding, contract assurance, and aggregated reporting, while also ensuring that all parties comply with data protection legislation and maintain the highest standards of confidentiality and security.

Palladium International Limited will engage with other third party organisations as required to help those individuals seeking support as part of the programme into sustained employment by connecting people to work, support, and strengthen communities.

The councils retain oversight of the programme and may require access to relevant information to monitor delivery, evaluate impact, and fulfil their statutory duties; this would be handled through the accountable body.

We will not transfer your information to countries outside the European Economic Area (EEA) unless this is necessary, and only to countries which have sufficient safeguards in place to protect information.

We may also share personal information with the police and other local authorities under Article 23 of the General Data Protection Regulations in order to prevent or detect crime.

How long do we store your information?

The information will be held for as long as the Connect to Work Programme is running. Information will be either returned or destroyed at the completion of the contract and in line with any statutory or professional retention periods applicable dependent on the data obtained during the programme.

It is not the intention of this programme that information will be produced in a physical format, however, this may be required for business continuity purposes. If information is created in physical format it will be transferred to an electronic system as soon as possible and the physical information destroyed in an appropriate secure manner e.g. cross shredding, once it is no longer needed.

Does the service utilise automated decision-making?

The Connect to Work programme does not utilise automated decision-making in the services that it provides as human intervention is required to determine the needs and support of the Data Subjects.