

**Privacy Impact Assessment (PIA)**

# **Work First Scotland**

**August 2017**

# Privacy Impact Assessment (PIA) Work First Scotland

## 1. Introduction

The purpose of this document is to report on and assess against any potential Privacy Impacts as a result of the implementation of Work First Scotland.

## 2. Document metadata

2.1 Work First Scotland

2.2 Date of report: 30 March 2017

2.3 Author of report: Anne Ashton, Employability Programme Division

2.4 Information Asset Owner (IAO) of relevant business unit: Gavin Gray

2.5 Date for review of Privacy Impact Assessment (PIA): 1<sup>st</sup> September 2017

## 3. Description of the project

3.1 The Scotland Act 2016 provides the opportunity to develop a distinctively Scottish approach to employment support for disabled people and those who are at risk of long-term unemployment due to a health condition. The Scottish Government (SG) will introduce transitional arrangements to deliver this employment support from 1 April 2017. These will remain in place until 30 April 2019, in advance of the full SG programme of employment support from 1 April 2018.

3.2 The Work First Scotland (WFS) Programme is a voluntary programme of employment support for disabled people and those who are at risk of long-term unemployment due to a health condition. The programme will be owned and governed by the SG and delivered by three contracted service providers (SG service providers); Momentum, Remploy and The Shaw Trust. The Department for Work and Pensions (DWP) acting on behalf of the SG will refer claimants to SG service providers using existing DWP systems and following an established DWP Work Coach referral process.

3.3 In some cases one of a number of Statutory Referral Organisations (SROs) will introduce the customer as a potential Work First Scotland customer. Having determined the customer's eligibility, the SG service provider will send referral information to the local JCP office, who will record the referral on their systems in order to allow the SG service provider to claim outcome payments at a later stage. The data will be shared with DWP in writing through tracked post. SG have not set a limit on the number of referrals from SROs however it is anticipated that this will be a small number, with the majority of referrals sourced from DWP work coaches. A full list of SROs is provided at **Annex B**.

3.4 In addition, SG will use data provided by DWP and SG service providers for the purposes of providing briefing to Scottish Ministers and to produce statistics. The data provided by DWP for these purposes will be aggregate data from their Provider Referral and Payment system (PRaP). Personal data held by SG service providers will be anonymised and used to allow SG to produce summary statistics and report on the demographic characteristics of customers on the programmes.

3.5 DWP will provide the following services, and process Personal Data on behalf of SG for the following purposes:

- Job Centre Plus (JCP) Work Coaches will identify eligible customers based on the eligibility criteria set out by the SG for Work First Scotland and make referrals to SG service providers via DWP systems, including Provider Referral and Payment System (PRaP). SG service providers will access PRaP via the Government Gateway.
- In the case of referrals made directly by SROs to SG service providers, DWP will record the referral on their systems (as above). DWP will then process Personal Data for the following purposes.
- On receipt of invoice – generated by SG service providers via DWP systems – DWP will generate a pay file and transfer this for payment to the SG payment system.
- DWP will provide a post payment validation report and compliance monitoring transaction file on a monthly basis, both of which will include personal data. This information will be transferred securely via email.
- DWP will additionally provide a monthly MI Pack (Weekly MI Pack to be provided for the first 8 weeks). Neither report will contain any personal data.
- Where appropriate JCP Work Coaches will action the Leavers Plan completed by SG service providers when the customer exits the WFS Programme and shared only with the customer's consent. This data will be retained by DWP in line with their current arrangements.
- Secure data transfer service as agreed with SG to allow for the secure transfer of Personal Data between DWP and SG.

3.6 The scope and type of Personal Data that may be provided to or accessed by DWP as part of the Services and for the purposes as described at section 3.5 consists of:-

- Customer name
- National Insurance Number
- Postcode
- Address
- Telephone number

- 2<sup>nd</sup> Telephone number
- Employer details
- Staff payroll reference
- Salary & hours of work
- Potentially sensitive customer information

3.7 Further descriptions of the Personal Data and how it will be treated are provided in **Annex A**.

3.8 The processing by both SG and DWP in respect of WFS meets the requirements of condition 5(c) of Schedule 2 of the DPA (for non-sensitive personal data) and condition 7(c) of Schedule 3 where sensitive personal data are involved.

3.9 The Scotland Act 1998, as amended by the Scotland Act 2016 (Part 3 (Welfare Benefits and Employment Support) provides SG with the power to provide schemes such as WFS.

#### **4. Stakeholder analysis and consultation**

4.1 The following groups are involved in this project:

- Jobcentre Plus staff (including Work Coaches and Disability Employment Advisors), who are responsible for making referrals to Work First Scotland
- Statutory Referral Organisations (full list at **Annex B**) who will – in some cases – introduce customers to SG service providers as potential Work First Scotland customers.
- Momentum Skills, Shaw Trust and Remploy are Work First Scotland contracted providers, who are responsible for delivering services to customers
- DWP staff including Jobcentre Plus Work Coaches who will make referrals and staff in Contracted Employment Provision Directorate (CEPD) who are responsible for supporting the delivery of DWP's Provider Referral and Payment System (PRAP) on behalf of SG
- SG Contract Performance and Operations Team (CPOT) who are responsible for managing contracts with SG service providers, including performing validation checks.

4.2 During 2015 SG consulted extensively to inform the development of Scotland's employability services. Following careful and independent analysis of the responses received, the key principles and values of the Scottish Approach to employability which will underpin devolved employability services in Scotland from 1 April 2017 were set out in March 2016 in *Creating a Fairer Scotland: A New Future for Employability Support in Scotland* (<http://www.gov.scot/Resource/0049/00498123.pdf>)

4.3 As part of the continued Fairer Scotland discussion, the Scottish Government's Employability Programme Division engaged the Central Government Digital Transformation Service (CGDTS) and User Research and Engagement (URE) teams to explore the personal experiences of people engaging with employability services. 21 organisations and over 150 individuals participated and the report was completed in December 2016.

4.4 No specific consultation on this PIA was considered necessary as the programme has been designed with minimal change from existing processes in order to provide a continuity of service for this transitional year. For example, SG service providers are the same as those currently delivering Work Choice for DWP and continue to satisfy existing DWP security requirements; referrals to WFS will be made using DWP's existing PRAP system.

4.5 This PIA will be shared with DWP and published on the SG website.

## 5. Questions to identify privacy issues

### 5.1 Involvement of multiple organisations

- The delivery of Work First Scotland will involve the Scottish Government, the Department for Work and Pensions and SG service providers contracted by the Scottish Government; Momentum Skills ([www.momentumskills.org.uk](http://www.momentumskills.org.uk)), Remploy ([www.remploy.co.uk](http://www.remploy.co.uk)) and Shaw Trust ([www.shaw-trust.org.uk](http://www.shaw-trust.org.uk)) and Statutory Referral Organisations.

### 5.2 Anonymity and pseudonymity

- The project does not require the matching of data sources together to produce new data.

### 5.3 Technology

- The transfer of a payment file between DWP and SG will require a new interface between DWP's Provider Referral and Payment System (PRAP) and SG's Scottish Government Enterprise Accounting System (SEAS). The payment file transferred at this stage will include the customer's National Insurance number. This process will trigger an automatic outcome-based payment by the SEAS system to the SG service provider. This process will take place via the Government Gateway and will not have substantial potential for data intrusion.
- Management information will be transferred between DWP and SG via secure email and Bravo. These are not new systems. In some instances personal data will be transferred. A full account of the data being transferred is provided at **Annex A**.

### 5.4 Identification methods

- The customer's National Insurance number will be used as a unique identifier.
- There will be no new or substantially changed identity authentication requirements.

### 5.5 Personal data

- Personal data will be transferred from DWP to SG service providers and from SG service providers to SG Contract Management personnel. In some instances this will include sensitive data such as information about a customer's health.
- In some cases, SROs will introduce customers to the SG service provider as a potential Work First Scotland customer.
- This information will be used by SG service providers to ensure that the service being provided is appropriate to the customer's needs. Sharing of this information will be restricted to staff of the SG service providers who are delivering the service and a limited number of SG staff who require the data to carry out compliance and quality assurance checks to ensure that services are being delivered to a satisfactory standard.
- A full account of the data being transferred and the purpose is provided at **Annex A**. Access to this information will be limited to those with a direct need to use the information to benefit the customer and assure the quality of the service and will be transmitted and stored securely.
- The process of referral from DWP work coaches will mirror the existing DWP process of referral to current DWP service providers, as these service providers will also be contracted by the SG under WFS. Under WFS the DWP Work Coach will complete the referral and required data handling on behalf of the SG, sharing personal data with SG service providers at the point of referral.
- During the customer's time participating in WFS SG service providers may engage with DWP work coaches in order to effectively deliver the service. Where a customer has given the appropriate consent, DWP work coaches will continue to engage with the customer for DWP purposes. A leaver plan will be provided to DWP by the SG service provider when the customer leaves WFS without securing employment. This is to help the DWP work coach assess what further support would benefit the customer.
- SG will use personal data held by SG service providers to allow SG to report – in Ministerial briefings and statistical publications - on the demographic characteristics of customers on the programmes. This data will be held in accordance with SG service providers' security plans, and anonymised data shared with SG.
- With the customer's consent, SG and SG service providers may share data with employers, other training providers and for the purposes of developing marketing materials.
- With the customer's consent SG may contact the customer to invite them to take part in evaluation activities.

- These changes will apply to approximately 3,300 individuals.
- Data from SG service providers will be cross-referenced with data from PRaP for the purposes of quality assurance to allow the production of summary statistics and Ministerial briefings.

#### 5.6 Changes to data handling procedures

- There will not be new or changed data collection policies or practices that may be unclear or intrusive, the data collection will mirror existing DWP and SG service provider processes.
- There will not be changes to data quality assurance or processes and standards that may be unclear or unsatisfactory?
- There will not be new or changed data security access or disclosure arrangements that may be unclear or extensive
- There will not be new or changed data retention arrangements that may be unclear or extensive.
- There will not be changes to the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before.

#### 5.7 Statutory exemptions/protection

- The data processing will not be exempt in any way from the Data Protection Act or other legislative privacy protections.
- The project does not involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation

#### 5.8 Justification

- The project's justification does not include significant contributions to public security measures.
- During 2015 SG consulted extensively to inform the development of Scotland's employability services. Following careful and independent analysis of the responses received, the key principles and values of the Scottish Approach to employability which will underpin devolved employability services in Scotland from 1 April 2017 were set out in March 2016 in *Creating a Fairer Scotland: A New Future for Employability Support in Scotland* (<http://www.gov.scot/Resource/0049/00498123.pdf>)

As part of the continued Fairer Scotland discussion, the Scottish Government's Employability Programme Division engaged the Central

Government Digital Transformation Service (CGDTS) and User Research and Engagement (URE) teams to explore the personal experiences of people engaging with employability services. 21 organisations and over 150 individuals participated and the report completed in December 2016.

- The justification for the new data handling is not unclear or unpublished

## 5.9 Other risks

- There are no risks to privacy not covered by the above questions

## 6. The Data Protection Act Principles

### Principle 1

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless:

- a) at least one of the conditions in Schedule 2 is met, and
- b) in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.

6.1.1 The purpose of the project has been identified and set out in March 2016 in *Creating a Fairer Scotland: A New Future for Employability Support in Scotland* (<http://www.gov.scot/Resource/0049/00498123.pdf>)

6.1.2 Individuals will be told about how SG service providers will use their data at their initial interview, where they will be provided with a copy of the SG service provider's privacy notice. DWP's privacy notice is published on line. (<https://www.gov.uk/government/organisations/department-for-work-pensions/about/personal-information-charter>)

6.1.3 SG service provider privacy notices will be amended to reflect the delivery of Work First Scotland.

6.1.4 The conditions for processing which apply are:

- Condition 5(c) of schedule 2 (that the processing is necessary for the exercise of any functions of the Crown, a Minister of the Crown or a government department); and
- condition 7(1) (c) of schedule 3 (that the processing is necessary for the exercise of any functions of the Crown, a Minister of the Crown or a government department, for the processing of any sensitive data).

6.1.5 We are relying on the customer's consent to share information in order to:

- Allow data to be shared with employers

- Allow data to be shared with other training providers, although this is expected to happen rarely.
- Allow the use of case studies and good news stories for marketing purposes
- Allow a Leavers Plan to be shared with DWP
- Enable customers to be invited to take part in evaluation activities (see paragraph 6.1.7.)

6.1.6 Consent will be collected by SG service providers at the initial interview stage.

6.1.7 The evaluation of transitional services forms an integral part of the service delivery offer for WFS and so all data processing in relation to evaluation activity is covered at sign up to the service. We are commissioning external research consultants to evaluate both service delivery processes and customer outcomes for WFS. In line with SG Social Research Guidance, this will involve completing a separate Privacy Impact Assessment and Ethics review of the commissioned evaluation activity. We will also seek informed consent from WFS customers to contact them directly (or through contracted researchers acting on our behalf) to participate in specific evaluation activities (e.g. a telephone interview or discussion group).

6.1.8 Participation on the programme is not dependent on giving consent to additional processing, where processing which is not a requirement for delivering the programme. Where the customer withholds or withdraws consent to share information as noted at paragraph 6.1.5, this will not affect their entitlement to access the services provided through Work First Scotland.

6.1.9 With reference to the Human Rights Act,

- The actions will not interfere with the right to privacy under Article 8.
- The social need and aims of the project have been identified.
- The actions are a proportionate response to the social need.

## **Principle 2**

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes.

6.2.1 The Employability Programme Plan for 2017 transitional services covers all of the purposes for processing personal data.

6.2.3 No potential new purposes have been identified as the scope of the project expands. Going forward any potential new purposes would be fully considered in line with our Data Protection obligations.

## **Principle 3**

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

6.3.1 The information we are using of good enough quality for the purposes it is used for and is subject to internal DWP quality control.

6.3.2 All personal data is required to deliver the project.

#### **Principle 4**

Personal data shall be accurate and, where necessary, kept up to date.

6.4.1 We are not procuring new software. The software we are using allows data to be amended when necessary.

6.4.2 Personal data is gathered by DWP under their existing processes and subject to DWP internal quality control. Personal data gathered by SG service providers in order to deliver the service and in order to carry out the activities listed at paragraph 6.1.5 will be gathered directly from the customer.

#### **Principle 5**

Personal data processed for any purpose or purposes shall not be kept for longer than necessary for that purpose or those purposes.

6.5.1 The personal data will be retained in line with current DWP practice. SG service providers will be required to retain personal data for 5 years and are required to hold the data in line with their security plans.

6.5.2 Existing software allows deletion of information in line with retention periods.

#### **Principle 6**

Personal data shall be processed in accordance with the rights of data subjects under this Act.

6.6.1 Existing systems will allow us to respond to Subject Access Requests, which will be dealt with in line with the arrangements set out in the Service Level Agreement between the DWP and SG in Respect Of Work First Scotland.

6.6.2 Participation on the programme is not dependent on the customer giving consent to their personal information being used for marketing purposes – see paragraph 6.1.5.

#### **Principle 7**

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

6.7.1 Existing systems such as the Government Secure Intranet and Bravo provide protection for the transfer of personal information between SG and DWP. Transfer Level Security has been put in place to allow for secure email between SG service providers, DWP and

6.7.2 All SG staff are appropriately vetted and are required to complete annual Data Protection Training. SG service providers have detailed security plans which have been approved by the SG Information Security and Risk team.

**Principle 8**

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

6.8.1 It is not expected that the project will require us to transfer data outside of the EEA.

6.8.2 If DWP identifies any offshoring requests that will affect data that are being processed on behalf of SG, SG will be consulted as a stakeholder in DWP's offshoring approvals process.

## 7. Risks identified and appropriate solutions or mitigation actions proposed

Is the risk eliminated, reduced or accepted?

Risk	Ref	Solution or mitigation	Result
Mismanagement by DWP staff – eg claimants who are not eligible for WFS are referred in error and therefore data shared inappropriately	DPF 01	<ul style="list-style-type: none"> <li>• A programme of awareness raising activity ahead of go-live will make JCP Work Coaches aware of WFS eligibility criteria.</li> <li>• JCP Work Coaches will be provided with a decision tree and other materials on their intranet to help them make referrals correctly.</li> <li>• An SG/DWP Operational Delivery Group will monitor the quality of referrals and take steps to address any issues identified.</li> </ul>	As a result, this risk is reduced, but not eliminated. It can be accepted on the grounds that monitoring referrals will be a central role of the Operational Delivery Group.
Personal data is mis-managed by SG service providers	DPF 02	<ul style="list-style-type: none"> <li>• SG service provider security plans reviewed and approved by SG security team</li> <li>• Regular contract management and compliance checks.</li> <li>• SG service providers are experienced in handling personal data and have arrangements in place to ensure staff are appropriately trained.</li> </ul>	Accept – risk is low
Personal data is mis-managed by SG staff	DPF 03	<ul style="list-style-type: none"> <li>• Personal data transferred via secure routes to a limited number of authorised personnel</li> <li>• Secure storage for electronic and hard-copy data</li> <li>• SG staff are appropriately vetted and are</li> </ul>	Accept – risk is low

		<p>required to complete annual Data Protection Training</p> <ul style="list-style-type: none"> <li>• Regular review of SG security arrangements</li> </ul>	
Systems: there is the potential for systems to be hacked, giving access to personal data.	DPF 04	<ul style="list-style-type: none"> <li>• Secure systems are being used to transfer data</li> </ul>	Accept – risk is low
General Data Protection Regulation – Fair Processing Notices do not meet new standard.	DPF 05	<ul style="list-style-type: none"> <li>• This PIA will be reviewed after 6 months at which time any necessary amendments will be made to align with the new standard.</li> </ul>	Accept – risk is low
The SRO referral process introduces additional risk that personal data will become accessible.	DPF 06	<ul style="list-style-type: none"> <li>• WFS operational guidance directs that the SRO referral form should be sent securely and via tracked mail to the relevant local JCP office.</li> <li>• SG service provider security plans reviewed and approved by SG security team</li> <li>• Regular contract management and compliance checks.</li> <li>• SG service providers are experienced in handling personal data and have arrangements in place to ensure staff are appropriately trained.</li> </ul>	Accept – risk is moderate

## 8. Incorporating Privacy Risks into planning

Explain how the risks and solutions or mitigation actions will be incorporated into the project/business plan, and how they will be monitored. There must be a named official responsible for addressing and monitoring each risk.

Risk	Ref	How risk will be incorporated into planning	Owner
Mismanagement by DWP staff – eg claimants who are not eligible for WFS are referred in error and therefore data shared inappropriately	DPF 01	<ul style="list-style-type: none"> <li>Risk will be monitored by the DWP/SG Joint Operational Performance Group</li> </ul>	JCP Integration Team Leader
Personal data is mis-managed by SG service providers	DPF 02	<ul style="list-style-type: none"> <li>Risk will be monitored by CPOT team as part of regular compliance checks and Contract Performance Meetings.</li> </ul>	Service Delivery Team Leader
Personal data is mis-managed by SG staff	DPF 03	<ul style="list-style-type: none"> <li>Risk will be monitored by CPOT team leader</li> </ul>	Service Delivery Team Leader
Systems: there is the potential for systems to be hacked, giving access to personal data.	DPF 04	<ul style="list-style-type: none"> <li>Risk will be monitored by the DWP/SG Joint Operational Performance Group?</li> </ul>	JCP Integration Team Leader
General Data Protection Regulation – Fair Processing Notices do not meet new standard.	DPF 05	<ul style="list-style-type: none"> <li>Fair Processing Notices have been reviewed and amended to meet new standards.</li> <li>This PIA report will be reviewed in 6 months' time at which time compliance with the new standard will be considered.</li> </ul>	Service Delivery Team Leader
The SRO referral process	DPF 06	<ul style="list-style-type: none"> <li>Risk will be monitored by CPOT team as part</li> </ul>	Service Delivery Team

introduces additional risk that personal data will become accessible.		of regular compliance checks and Contract Performance Meetings.	Leader
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## 9. Authorisation and publication

The PIA report should be signed by your Information Asset Owner (IAO). The IAO will be the Deputy Director or Head of Division.

Before signing the PIA report, an IAO should ensure that she/he is satisfied that the impact assessment is robust, has addressed all the relevant issues and that appropriate actions have been taken.

By signing the PIA report, the IAO is confirming that the impact of applying the policy has been sufficiently assessed against the individuals' right to privacy.

The results of the impact assessment must be published in the eRDM with the phrase "Privacy Impact Assessment (PIA) report" and the name of the project or initiative in the title.

Details of any relevant information asset must be added to the Information Asset Register, with a note that a PIA has been conducted.

**I confirm that the impact of delivering Work First Scotland has been sufficiently assessed against the needs of the privacy duty:**

<b>Gavin Gray (Deputy Director, Employability Programme Division</b>	<b>Date each version authorised</b>  <b>Version 1.0: 30 March 2017</b>
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## WFS Process List

Customer Journey Reference	Description of activity and Data Processing Arrangements
1	<p><b>SG Provide security accreditation for SG Providers and notifying POST</b></p> <ul style="list-style-type: none"> <li>No personal data is shared at this stage.</li> </ul>
2	<p><b>SG Provide POST with contract information to set up PRaP records and SG Providers information</b></p> <ul style="list-style-type: none"> <li>No personal data is shared at this stage.</li> <li>This information has been provided (SG Providers data, including bank details) via secure email.</li> </ul>
3	<p><b>POST set up and maintain SG Providers information and LMS / WSP Opportunity type on PRaP systems</b></p> <ul style="list-style-type: none"> <li>No data is shared at this stage.</li> </ul>
4	<p><b>POST set up contracts for SG provision on PRAP and (following SG Approval) transfer to LMS/WSP</b></p> <ul style="list-style-type: none"> <li>No data is shared at this stage.</li> </ul>
5	<p><b>JCP Work Coach performs diagnostic to identify eligible customers for WFS</b></p> <ul style="list-style-type: none"> <li>No data is shared at this stage.</li> </ul>
6	<p><b>JCP work coach discusses the SG Providers available with the customer</b></p> <ul style="list-style-type: none"> <li>No data is shared at this stage.</li> </ul>
7	<p><b>JCP work coaches make referrals via LMS or WSP systems to PRaP</b></p> <ul style="list-style-type: none"> <li>No data is shared at this stage.</li> </ul>
	<p><b>PRaP transmits referral to SG Provider</b></p> <ul style="list-style-type: none"> <li>DWP will transmit customer data to SG providers via their existing Provider Referral and Payment (PRaP) system.</li> <li>SG have provided DWP with the security assurance necessary to allow SG Providers access to PRaP.</li> </ul>
	<p><b>JCP 3<sup>rd</sup> Party team Undertake daily administration of incorrect referrals on behalf of SG</b></p> <ul style="list-style-type: none"> <li>No personal data is shared at this stage.</li> <li>Transferred by telephone call or secure email.</li> </ul>

8	<p><b>SG Providers acknowledge or Cancel referral using PRaP, in consultation with SG</b></p> <ul style="list-style-type: none"> <li>• Customer data including NI no</li> <li>• Provider shares information regarding cancellation to SG via email or phone;</li> <li>• Provider shares acknowledgement or cancellation with DWP via PRaP</li> </ul>
9	<p><b>SG Providers will issue DWP JCP work coach with a Leavers Plan within 10 days of customer exiting and undertake end action on PRaP (when customer consent given)</b></p> <ul style="list-style-type: none"> <li>• Customer data potentially including sensitive information</li> <li>• Shared by SG Providers with DWP In person or through secure mail (will vary by JCP office)</li> </ul>
10	<p><b>JCP work coach will action the Leavers Plan from the SG Providers (if received)</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage.</li> </ul>
	<p><b>SG Provider notifies DWP about the death of a customer</b></p> <ul style="list-style-type: none"> <li>• Customer data including sensitive information</li> <li>• Shared by SG Provider with DWP via Phone Call and followed in Writing</li> </ul>
	<p><b>DWP notifies SG Provider about the death of a customer</b></p> <ul style="list-style-type: none"> <li>• Customer data including sensitive information</li> <li>• Shared by DWP with SG via Phone Call and followed in Writing</li> </ul>
11	<p><b>POST : provide administrative support direct to SG Providers for the delivery of PRaP functions including SG Providers enquiry, support service and reporting</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage.</li> </ul>
12	<p><b>SG Providers generate Invoices</b></p> <ul style="list-style-type: none"> <li>• Personal data including: <ul style="list-style-type: none"> <li>• PO number</li> <li>• Employer details</li> <li>• Salary &amp; hours</li> </ul> </li> <li>• Shared by SG Providers with DWP via PRaP</li> </ul>
13	<p><b>PRAP system generates a payment file</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
14	<p><b>POST securely transfer electronic Payfile to SG payment system SEAS</b></p> <ul style="list-style-type: none"> <li>• Personal information including: <ul style="list-style-type: none"> <li>• Customer name</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• NINO</li> <li>• Postcode</li> <li>• Address</li> <li>• Shared by DWP with SG Via PRaP</li> </ul>
<b>15</b>	<p><b>SG processes payment via SEAS</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
<b>16</b>	<p><b>DWP provides SG with Payfile Report</b></p> <ul style="list-style-type: none"> <li>• No personal data <ul style="list-style-type: none"> <li>• SG/Non SG Parameter</li> <li>• Payment Date</li> <li>• Payment Number</li> <li>• Payment Amount</li> <li>• Invoice Number</li> <li>• Invoice Date</li> <li>• Invoice Line Description</li> <li>• Tax Status</li> <li>• Tax Classification Code</li> <li>• Line Amount</li> <li>• Invoice Tax Amount</li> <li>• Invoice Total Amount</li> <li>• Purchase Order Number</li> <li>• CPA Number</li> <li>• BPA Number</li> <li>• Supplier Name</li> <li>• Supplier Site Code</li> <li>• Supplier Number</li> </ul> </li> <li>• Shared from DWP to SG by email to nominated SG mailbox. The email will be marked "Official Sensitive". The report will be password protected.</li> </ul>
	<p><b>SG to administer the direct payment of outcome fees to Service Providers for clerical records such as Sensitive Customer Records (SCRs)</b></p> <ul style="list-style-type: none"> <li>• Customer information</li> <li>• Shared between SG and SG Service Providers by secure tracked post</li> </ul>
<b>17</b>	<p><b>POST securely provide full details of all outcomes payments report (PPVR) on a monthly basis</b></p> <ul style="list-style-type: none"> <li>• Personal data including : <ul style="list-style-type: none"> <li>• Customer name</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• NINO</li> <li>• Postcode</li> <li>• Address</li> <li>• Telephone number</li> <li>• 2<sup>nd</sup> Telephone number</li> <li>• Employer details</li> <li>• Staff payroll reference</li> </ul> <ul style="list-style-type: none"> <li>• Shared from DWP to SG by email to nominated SG mailbox. The email will be marked "Official Sensitive". The report will be password protected.</li> </ul>
<b>18</b>	<p><b>SG carry out payment validation checks</b></p> <ul style="list-style-type: none"> <li>• Personal data including : <ul style="list-style-type: none"> <li>• Customer name</li> <li>• NINO</li> <li>• Postcode</li> <li>• Address</li> <li>• Telephone number</li> <li>• 2<sup>nd</sup> Telephone number</li> <li>• Employer details</li> <li>• Staff payroll reference</li> </ul> </li> <li>• Shared from SG to customer or employer by phone</li> </ul>
<b>19</b>	<p><b>SG administer and pay service fees direct to SG Providers</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
<b>20</b>	<p><b>SG action payment recovery following Validation</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
<b>21</b>	<p><b>To allow compliance checks, CEPMI will securely provide a full file of customers for each contract/CPA area on a monthly basis via Bravo</b></p> <ul style="list-style-type: none"> <li>• No Personal data : <ul style="list-style-type: none"> <li>• SG Service name</li> <li>• Contract reference number</li> <li>• PRaP referral reference number</li> <li>• CPA</li> <li>• Customer Group</li> <li>• Referral date</li> <li>• Start date</li> </ul> </li> <li>• Shared by DWP to SG via Bravo</li> </ul>
	<p><b>SG CPOT carry out compliance checks</b></p> <ul style="list-style-type: none"> <li>• Customer data including personal information</li> </ul>

	<ul style="list-style-type: none"> <li>• Shared by SG Providers with SG at face to face compliance visits</li> </ul>
22	<p><b>CEPMI will provide Scottish Government an MI Pack on a Monthly basis per provider per CPA</b></p> <ul style="list-style-type: none"> <li>• <b>No Personal data :</b> <ul style="list-style-type: none"> <li>• Referrals</li> <li>• Starts</li> <li>• Job Entries</li> <li>• Job Outcomes</li> <li>• Sustainment Outcomes</li> </ul> </li> <li>• Shared by DWP to SG via Bravo</li> </ul>
22	<p><b>Weekly MI (issued first 8 weeks of contract)</b></p> <ul style="list-style-type: none"> <li>• <b>No personal data:</b> <ul style="list-style-type: none"> <li>• Net Referrals (Gross minus rejected / cancelled)</li> <li>• (Of Which) Did Not Attend</li> <li>• (Of Which) Did Not Start</li> <li>• Starts - In Week</li> <li>• First Job Entries - Started In Week</li> </ul> </li> <li>• Shared by DWP to SG via Bravo</li> </ul>
23	<p><b>SG adjust MI following Validation</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
24	<p><b>SG publish MI</b></p> <ul style="list-style-type: none"> <li>• No data is shared at this stage</li> </ul>
	<p><b>SG carry out payment validation checks for Sensitive Customer Records cases</b></p> <ul style="list-style-type: none"> <li>• Sensitive Customer Information</li> <li>• Shared by SG Providers with SG by Tracked Post or face to face</li> </ul>
	<p><b>Customer Complaints</b></p> <ul style="list-style-type: none"> <li>• Customer data including personal information</li> <li>• Shared between customer, SG, SG Provider and potentially DWP by email / letter</li> </ul>
	<p><b>SG Provider Requests Extension of Customer's Pre Employment time</b></p> <ul style="list-style-type: none"> <li>• Customer Data</li> <li>• Shared by SG Providers with SG by secure email.</li> </ul>
	<p><b>SG Provider Reports Customer Unacceptable Behaviour</b></p> <ul style="list-style-type: none"> <li>• Customer data including personal information</li> <li>• Shared between SG Provider and SG and/or DWP by secure</li> </ul>

	email
	<b>SG Provider Reports Accident / Incident within Provider Premises</b> <ul style="list-style-type: none"><li>• Customer Data</li><li>• Shared by SG Providers with SG by secure email.</li></ul>

## List of Statutory Referral Organisations

Contract Package Area (CPA)	Provider	Statutory Referral Organisations (SRO)
1	Momentum Scotland	Aberdeen Foyer Aberdeenshire Council Employability Service Cantraybridge College Capability Works Enable Scotland Highland Council Employability Services Inverness, Badenoch & Strathspey Citizens Advice Bureau Momentum Pathways Moray Council Nansen Highland New Start Highland NHS & GG&C Renfrewshire CHP Penumbra The Richmond Fellowship Turning Point Scotland (Rosie's Ent) Community Food Initiatives North East West College Scotland
1	Remploy	Working Health Services Scotland Aberdeen Foyer, Turning Point Scotland Rosies Enterprises Aberdeen Action on Disability Inspire Solstice Nurseries Penumbra Nova Project Scottish Association for Mental Health
2	Shaw Trust	Carnegie College Matrix Fife Forth Valley College Falkirk Council - CLD Quarriers Canal College Westbank Enterprises Frontline Fife Homelessness Services Perth College UHI NHS Fife Gowrie Care
2	Remploy	Forth Valley Fife and Tayside Working Towards Health Team (NHS Tayside) The Employment Unit NHS FIFE Careers (SDS)

3	Shaw Trust	<p>The Coal Yard  Lead Scotland  Healthy Working Lives  Mental Health Network  Glasgow Disability Alliance  Glasgow CC  Intowork  Individual Placement Support  North Lanarkshire Council  Routes to Work  Experience Counts  Glencryan School  Enable Scotland  Jobs and Business Glasgow  Esteem</p>
3	Remploy	<p>In2 Work Project  World of Work  Anniesland College  NHS Lanarkshire  Salus NHS Scotland  Skills Development Scotland  ITEC Integrations LTD  S.A.M.H  Coatbridge College  University of Strathclyde  Working Health Services Scotland  Glasgow University  EDAMH (East Dunbartonshire Association for Mental Health)  Glasgow Helping Heroes  Restart Project (NHS GGC)  Enable Scotland  Waverley Care</p>
4	Shaw Trust	<p>SPACE - Forth Sector  Intowork  Scottish Borders Council  NHS Lothian Working Health Services  Open Door  Training Opportunities in Lothian  City of Edinburgh Council  SAM H Gateway Services  Access to Employment  Craigroyston Health Clinic  Craighill Health centre  The Broomhouse Centre  West Lothian College  West Lothian Council  Scottish Borders Council - Youth Work Team  Borders College  Inverclyde Council  Brothers of Charity</p>

		Redhall Walled Garden Enable Scotland South Ayrshire Council Skills Development Scotland Project Search Your Voice
4	Remploy	East Ayrshire council Jewel and Esk College Get on Edinburgh The Action Group Health in Mind Kilmarnock College Edinburgh Cyrenians Reid Kerr College Access to Employment Ayr STEP Scottish Veterans Housing Association The Princes Trust



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