

Work Experience privacy impact assessment

**Completed by Work Experience Programme Young People and
Employment Division**

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Work Experience privacy impact assessment

This privacy impact assessment covers all parts of Work Experience.

Project Outline

1. In the publication, "[The Coalition: our programme for government](#)" the Government explicitly committed to:

“seek ways to support the creation of apprenticeships, internships, work pairings, and college and workplace training places as part of our wider programme to Get Britain working.”
2. Subsequent discussions with Ministers and stakeholders have enabled us to refine these commitments to the proposals set out in this document.

Proposal

3. Work Experience will be part of a package of additional support options to help individuals into work.
4. Work Experience forms part of the Get Britain Working measures which include:
 - New Enterprise Allowance
 - Work Clubs
 - Work Together
5. We are also developing further options to encourage pre-employment training and work placements through Service Academies.
6. The aims of Work Experience are:
 - help maximise the number of young people moving into employment;
 - help maximise the off flow of young people before entering the work programme; and
 - provide young people with quality work experience.
7. These measures will be introduced in January 2011 and targeted at fourteen areas across Great Britain. Target areas will use additional funding provided to deliver work experience placements, but other areas will have the flexibility to arrange placements, but will have to fund them selves.

8. Work Experience will form part of a wider menu of additional support options that can be used by Jobcentre Plus to help benefit claimants into work, prior to referral to the Work Programme.
9. It is focused on young people aged 18-21 who are first time jobseekers and/or are furthest away from the labour market. Employers who host work experience will offer a period of between two to eight weeks. The duration will be determined by looking at the needs of the participant alongside those of the industry. To maximise effectiveness, opportunities will be targeted at customers who have little or no work history, or have a low skills base. However, participants will need to demonstrate a willingness to work.
10. Following the initial evaluation of the programme in spring 2011, the department will consider whether to extend work experience to a wider age range and other benefit recipients. Employment and Support Allowance work related activity customers will in discussion with their advisers have access from summer 2011.
11. Jobcentre Plus Advisers will be able to direct claimants of Employment and Support Allowance to carry out a specific activity (such as skills training) in order to meet the work related activity requirement). However, work related activity legislation does not allow Employment and Support Allowance claimants to be mandated to activity deemed work, such as work experience. It is expected that Employment and Support Allowance claimants will have a plan tailored to their individual needs and will be able to engage and continue participation in the Work Experience programme on a voluntary basis. The voluntary status of these claimants' participation means they are not subject to sanctions for failure to carry out Work Experience direction.
12. Depending on successful rollout for 18-21 year olds, we intend to consider the case for giving advisers limited discretion to offer work experience to customers who are over 21 and face similar barriers and labour market needs - for example significant disadvantages and a lack of previous work experience or employment.
13. Customers will be eligible to participate on a voluntary basis from the 13th week of their Jobseeker's Allowance claim. However, from April 2011 regulations are being introduced that will assert that once a placement has been agreed, attendance will become mandatory (except for the one-week probationary period) and participants will be subject to sanction for non-attendance or inappropriate behaviour whilst on the placement.

14. Jobcentre Plus will work with hosts¹ to manage the delivery of the programme. Jobcentre Plus also has the option to broker placements through local and / or national intermediaries.

15. Jobcentre Plus will be responsible for:

- sourcing suitable Work Experience placements;
- entering into Service Level Agreements;
- identifying and matching eligible customers to placements;
- providing support to both the host and customer during the placement;
- ensuring compliance with relevant conditionality;
- providing appropriate support post-placement; and
- assuring employers confirm that they meet relevant legislation prior to placement.

16. Participants will continue to be paid at their benefit rate, and those claiming Jobseeker's Allowance will be subject to all existing conditionality requirements such as actively seeking work, being available for employment, and attending regular face-to-face interviews at Jobcentre Plus, for the duration of their placement. Funding will also be available to cover travel and childcare costs arising as a result of the placement.

Work Experience

Stakeholder Analysis

Q Does the project involve multiple organisations, whether they are government agencies (for example, in 'joined-up government' initiatives) or private sector organisations (for example, as outsourced service providers or as 'business partners')?

17. A series of internal and external consultation events have been held on 'Get Britain Working' policy and the findings have been used to shape policy for the Work Experience. This included consulting with the Princess Trust, The Stephen Lawrence Trust and Jobcentre Plus, which would subsequently be responsible for delivering Work Experience.

18. Divisions in Jobcentre Plus included in the shaping of Work Experience policy include; Partnerships, Products and Security.

19. Jobcentre Plus advisors will use their own discretion and flexibility to assess the most suitable candidates for Work Experience.

¹ 'hosts' – employers or sole traders who are hosting Work Experience placements

20. Where Work experience is available Jobcentre Plus Advisers will also have the key role of promoting it to customers. They will identify eligible, suitable and interested customers during interventions, focusing on those furthest away from the labour market that is most likely to benefit from participation. They will then refer them to the Work Experience team who will match and select them for suitable placements.

Employer Engagement

21. In December 2010, 196 national employers were approached by the Work Experience policy team to gauge interest in participating in the new Work Experience. Of those approached 29 employers responded by expressing an interest, 48 said they would not be interested, and 119 replied with they may possibly be interested in offering Work Experience.

22. National employers interested in participating in Work Experience, include; Austin Reed, Aviva, BT Group, Co-Operative Group and DHL.

23. All employers approached in the consultation were content for local engagement by JCP

24. Most stated local circumstances would determine level of interest

25. Of those not interested main reasons were:

- i. Not interested at present
- ii. Doesn't fit with the nature of the business
- iii. Potential damage to customer service reputation (limited number)

Environmental Scan

26. The Work Experience policy and implementation team has mapped out stakeholders key to delivery and a number of internal and external consultation events have been held and outcomes have been used to formulate policy development. For example Princes Trust, Skanska and Business in the Community run similar work experience opportunities for young people. They have found that holding "enthusing" days where a number of potential participants are invited along to information sessions with employers often on the employer premises improves commitment from both parties. This has been incorporated into advice and guidance for District Managers offering them suggested practice on the way they might want to use their flexibilities to set up referrals.

Technology

Q Does the project apply new or additional information technologies that have substantial potential for privacy intrusion? These include, but are not limited to, smart cards, radio frequency identification tags, biometrics, locator technologies (including mobile phone location, applications of global positioning systems and intelligent transportation systems), visual surveillance, digital image and video recording, profiling, data mining, and logging of electronic traffic.

27.No

Identity

Q Does the project involve new identifiers, re-use of existing identifiers, or intrusive identification, identity authentication or identity management processes?

28.No

Q Might the project have the effect of enabling identification of customers who were previously anonymous? Does the project involve new or substantially changed identity authentication requirements that may be intrusive or onerous?

29.No, the project does not involve new identifiers. Records are already held on all benefit recipients for the purposes of assessment and payment of benefit. Jobseekers are currently identified as part of the Jobseeker's Allowance regime in order to be called in for interview.

Q Does the Project include Criminal Record Bureau Disclosures/Checks?

30.Yes, Criminal Record Bureau checks will be carried out for individual participants whose placement activity involves dealing with vulnerable groups and placements where there is potential access to confidential or sensitive information e.g. Government departments. The aim of the Disclosure service is to enhance public safety and enable employers and voluntary organisations to make safer recruitment decisions. Employers will be expected to use this information only as one part of their normal recruitment processes.

Data

Q Does the project involve new or significantly changed handling of sensitive personal data such as racial and ethnic origin, political opinions, religious beliefs, trade union membership, health conditions, sexual life, offences and court proceedings, or financial data, particular data about vulnerable individuals, and data which can enable identity theft?

31.No.

Q Does the project involve new or significantly changed handling of a considerable amount of personal data about each individual in the database?

32.No

Q Does the project involve new or significantly changed handling of personal data about a large number of individuals? Much Departmental work will involve large numbers of individuals. The focus here will therefore probably need to be on 'new or significantly changed handling'.

33.No

Q Does the project involve new or significantly changed consolidation, inter-linking, cross-referencing or matching of personal data from multiple sources? This is an especially important factor. Issues arise in relation to data quality, the diverse meanings of superficially similar data-items, and the retention of data beyond the very short term.

34.No, the project does not involve significantly changed handling of data.

Data Handling

Q Does the project involve new or changed data collection policies or practices that may be unclear or intrusive?

35.No. Existing exemptions will be used in the transfer of data. Jobcentre Plus will use the existing Jobcentre Plus, CV Job Brokering Service to submit a customer's CV to a host.

36.Jobcentre Plus' CV Job Brokering Service is a service where Jobcentre Plus will submit a customer's CV direct to job vacancies where the customer has given their consent for us to do so. This saves the customer time and money in making their application, and may help to identify opportunities that the customer would otherwise be unaware of.

37.Advisers will explain the benefits of participating in the curriculum job brokering service to the customer and ask:

- if the customer would like to take part and
- if the customer consents to their curriculum vitae being sent to employers by email

38.In existing Department for Work and Pensions procedure, data is already shared with contracted provision and with employers.

39.Current procedure requires specific consent forms to be developed by individual projects where data sharing of customers details are required.

40. Jobcentre Plus has produced a specific consent form for claimants to complete in order to allow the sharing of data. This is to allow Jobcentre Plus share personal information about the claimant with the hosts providing the Work Experience placement.
41. Without the claimants consent, Jobcentre Plus is unable to support the claimants Work Experience placement.
42. Personal information will not be passed to any other organisation who is not involved in helping the participant to find work.
43. The claimant is able to withdraw consent by contacting their personal adviser or the Work Experience team.
44. The standards for individual members of staff are included in the [human resource data handling policy](#) and must be considered when retaining and sending information to hosts.

Q Does the project involve new or changed data quality assurance processes and standards that may be unclear or unsatisfactory?

45. No

Q Does the project involve new or changed data security arrangements that may be unclear or unsatisfactory?

46. No

Q Does the project involve new or changed data access or disclosure arrangements that may be unclear or permissive?

47. No

Q Does the project involve new or changed data retention arrangements that may be unclear or extensive?

48. No

Q Does the project involve changing the medium of disclosure for publicly available information in such a way that the data becomes more readily accessible than before?

49. No, data policies will be consistent with those already in operation for current Jobcentre Plus procedures.

Exemptions and Exceptions

Q Does the project relate to data processing which is in any way exempt from the Data Protection Act or other legislative privacy protections? This might be the case in areas such as law enforcement or public security.

50. No, no such exemptions or exceptions apply in this case.

Q Does the project involve systematic disclosure of personal data to, or access by, third parties who are not subject to comparable privacy regulation, e.g. where they are in a foreign jurisdiction.

51. No, the project does not involve systematic disclosure of personal data to third parties who are not subject to privacy regulations. Hosts are bound by privacy regulations as part of Departmental screening processes. Hosts are bound by the terms of the Data Protection Act in handling the information provided by the Jobseeker. Information on a customer will not be passed on to a host, unless the customer agrees to that information being processed in this manner.

Justification

Q Is the justification for the new data-handling unclear or unpublished? Individuals are generally much more accepting of measures, even measures that are somewhat privacy-intrusive, if they can see that the loss of privacy is balanced by some other benefits to themselves or society as a whole. On the other hand, vague assertions that the measures are needed 'for security reasons', or 'to prevent fraud', are much less likely to calm public disquiet.

52. No, justification is clear. There are clear benefits to the introduction of Work Experience. Data is already held on Jobseekers and shared with external partners. Hosts will be signed up to Jobcentre Plus requirements around data protection and data sharing.

53. Work Experience will improve the employment prospects of eligible customers. The offers focus largely, but not exclusively, on individuals aged 18-21. This reflects the particular labour market disadvantages faced by this group and the longer-term consequences of youth unemployment on society.