

WM ADASS Privacy Notice International Recruitment (IR) Programme

What this document is for

This privacy notice provides details on how West Midlands Association of Directors of Adult Social Services (**WM ADASS**) uses information within the International Recruitment (**IR**) Programme within the West Midlands (**WM**).

The IR WM Programme for 2024/25 is designed to support displaced international care workers to find alternative employment in adult social care with ethical employers.

Who we are

WM ADASS

WM ADASS oversees the IR WM Programme. Within this programme we have commissioned 'delivery partners' (**DPs**). These are West Midlands Care Association (WMCA), Better Care Homes Services Ltd t/a Lifted and Upstream Outcomes Limited t/a Bridgit Care who each hold personally identifiable information. Thus, they are the "data controllers" for the personal information they hold. This means they are responsible for deciding how they "process" (collect, hold, use and disclose) your personal information. Each DP has its own privacy policy regarding how it will collect and process your personal data.

From November 2024 onwards WMADASS does not receive / share any personal information from delivery partners. All information received for reporting purposes is anonymised.

What we use your information for

We will use anonymised information to:

- Report programme progress to partners and the Department of Health & Social Care
- Monitor programme progress and track outcomes
- Inform and share learning and evaluation

Personal data we collect and use about you

We will usually not collect any personal information about you, except in certain circumstances where there is a safeguarding concern (see below). The type of personal data we could collect includes:

- Identity and contact information such as your name, postal address, email address, contact number, date of birth and/or gender.
- Financial information relating to your employment.
- Employment history.

Who provides this information and how is it collected

We only receive anonymised information from our Delivery Partners who work with us to deliver the programme. Such information has been collected through you interacting with our Delivery Partner(s) via contacting the Delivery Partners directly which can be through their website or apps.

Who we share your information with

We will share your information with:

Sometimes we may need to share your personal data with trusted third parties in order to carry out our work, fulfil our obligations to you or work as efficiently as possible. When we share your personal information, we will share it with trusted third parties who act as Data Controllers on our behalf, with a lawful basis for doing so and in accordance with the law

Any information which is shared will only be shared on a need-to-know basis, with appropriate individuals. Only the minimum information for the purpose will be shared.

How we use your data where there are safeguarding concerns

The only exception to the above is where safeguarding concerns have been identified where we may need to use personal information for referral purposes. Referral will normally be to the person's local Authority Safeguarding Lead.

Wherever possible, we anonymise the data involved so that we can use statistical information without needing to keep a record of any information which identifies you.

How the law protects you and the legal basis for processing your information

For the provision of support to international care workers seeking alternative employment and or other support, our delivery partners have legal grounds under the UK GDPR to process this information.

Our DPs each have their own consent mechanisms and privacy statements in place which set out the purposes for which they will use your personal information, who it will be shared with and how long it will be stored for.

How long will we keep your personal information for

In the limited circumstances where we may hold your personal data, we will securely store your personal data for as long as it is reasonably necessary to fulfil the purpose for which the data was collected. The duration for how long we may hold the personal data may be dependent on the personal data in questions, what it is being used for and whether there is any legal or regulatory requirement for retaining the personal data.

Your rights under the UK GDPR

You have the following rights (but they do not apply in all circumstances). You have the right to:

- be informed about the processing of your personal information. This is why you have been given this document.
- have your personal information corrected if it is inaccurate and to have incomplete personal information completed
- object to the processing of your personal data
- restrict processing of your personal information
- have your personal data erased ("the right to be forgotten"). This right is subject to several restrictions which will be discussed further with you if you choose to exercise it
- move, copy or transfer your personal information ("data portability") in some circumstances.
- request access to your personal information and information about how we process it.
- withdraw any consent you have given for the processing of personal data at any time.

Questions or complaints

If you have any questions about this privacy notice, you can write to our data protection officer at Shelley.Madley@wm-adass.org.uk.

Our address is:

West Midlands ADASS
c/o Shropshire Council
The Guildhall, Frankwell Quay
Shrewsbury
SY3 8HQ

You also have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues. The ICO can be contacted:

- by writing to the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
- by telephoning 0303 123 1113
- online at <https://ico.org.uk/global/contact-us/>

Changes to this notice

We may amend this privacy notice at any time so please review it frequently. The date below will be amended each time this notice is updated.

This notice was created on 28 February 2025.