

**Privacy Notice for Prevention  
and Promotion Fund for Better  
Mental Health: Addressing  
Financial Insecurity and Debt  
2021-2022**

**04/01/2022  
V1.0**



# Prevention and Promotion Fund for Better Mental Health: Addressing Financial Insecurity and Debt 2021-2022

Our core data protection obligations and commitments are set out in the council's **primary** privacy notice at [www.bolton.gov.uk](http://www.bolton.gov.uk)

## Project and description and purpose for data processing

The impact of coronavirus (COVID-19) and the social and economic consequences of the pandemic have meant that tackling mental health at a population level has never been more important. COVID-19 has been recognised as a public mental health emergency that exacerbates existing mental health inequalities.

This project aligns with Public Health England's Strategy 2020 to 2025, which outlines the need to ensure Better Mental Health as a priority and parity of esteem between mental and physical health.

The pandemic has exacerbated the increasing number of residents facing financial insecurity and debt, impacting on the individual's wellbeing and mental health. The contributing factors to financial insecurity and debt are:

- Unable to keep up housing/tenancy;
- Unemployment;
- Poverty;
- Personal crisis and difficult events;
- Young people transitioning to adult life;
- Accessing services, information and help.

This project will aim to provide early intervention mental wellbeing support to residents aged 18 and over living in Bolton who may be experiencing financial difficulty and debt.

The offer will include one to one wellbeing support. A choice of face to face, online, telephone and information resources will be offered.

Residents contacting the Council through the following services will be eligible to the offer as well as self-referral routes to the support.

- Local Welfare Provision Scheme
- Discretionary Housing Payment Scheme
- Council Tax Hardship Scheme
- Community Response Hub
- One Stop Shop
- Money Skills Service

Bolton Council have commissioned Supported Steps CIC (Data Processor) who will be undertaking and delivering this project on behalf of Bolton Council who are the data controller.

The processing is necessary so that we can support individuals and so that the Processor, Supported Steps CIC can effectively deliver the contract and effectively evaluate this project.

You can find out more about Supported Steps CIC <https://supportedsteps.co.uk/>

This notice provides additional privacy information for:

- Members of the public and providers service users who are engaging and accessing the delivered service.
- Partners working with Bolton Council

It describes how we collect, use and share personal information about you

- In relation to Prevention and Promotion Fund for Better Mental Health: Addressing Financial Insecurity and Debt 2021-2022
- the types of personal information we need to process, including information the law describes as 'special' because of its sensitivity.

It is important that you read this notice, together with any other privacy information we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

The information collected and held will vary dependent on the service used

### **What personal information we collect**

Supported Steps CIC will collect personal information for the Council. This will ensure we can effectively deliver and evaluate this project. The personal information we will ask for could include:

- Name
- Gender
- Age
- Address and postcode
- Telephone numbers or email address
- Data revealing racial or ethnic origin
- Wellbeing measure score
- Disability status

### **Who we collect personal information about?**

When we collect personal information, it will be about:

- Residents aged 18 and over living in Bolton.

### **How we use personal information**

We might use your personal information to:

- Access to mental wellbeing support during time of financial insecurity and debt.
- Offer of a wellbeing intervention, e.g., wellbeing conversation, self helps tools, training and awareness, invite to webinars/events

- Monitoring and evaluation -including surveys and interviews
- To understand our stakeholder groups, citizens and users so we are able to better understand our programme offer.
- So, we can track, monitor, and amend our programme in line with the demand, needs and requirements of the market.
- As part of the reporting for Office of Health improvement and disparities data
- To measure the health, mortality, or care needs of the local population
- To plan, evaluate or monitor public health programmes

The processing is necessary in order to ensure that Supported Steps CIC can effectively deliver the contract and effectively evaluate a project.

### **Why we use your personal information-**

The legal basis for processing your personal information is:

The legal gateway is found in Articles 6 and 9 of the UK GDPR:

- Article 6 (1) (b) Performance of a contract (Supported Steps CIC – commissioned provider to the Council)
- Article 6 (1) (e) Public task: the processing is necessary for the performance of a task in the public interest.
- Article 9 Special Category Processing
- Article 9(2)(g) substantial Public Interest

The legal basis for processing your personal information for non-direct care purposes is also contained in Section 42(4) of the Statistics and Registration Service Act (2007) as amended by Section 287 of the Health and Social Care Act (2012) and Regulation 3 of the Health Service (Control of Patient Information) Regulations 2002.

We are also allowed to process personal and sensitive data for the following reasons under the UK General Data Protection Regulation (GDPR) Articles and the Data Protection Act 2018:

- For public tasks or statutory functions
- Where there is substantial public interest
- For the management of health and social care systems or services
- For reasons of public interest in the area of public health

### **Who we share your personal information with?**

As part of the process, we will send anonymous information to:

- Office for Health Improvement and Disparities
- External organisation who will be undertaking the evaluation of the programme (Public Perspectives Ltd) [www.publicperspectives.co.uk](http://www.publicperspectives.co.uk)
- Partner organisations such as NHS Bolton Foundation Trust, NHS Bolton CCG, Greater Manchester Mental Health Foundation Trust, to share progress of the project
- Other local authorities for learning and development

We hold and share information for public health purposes about people we directly provide a service to and people for whom we have a responsibility for in respect of our public health functions.

We will not normally share your information with organisations other than our partner organisations; however, there may be certain circumstances where we would share without consent such as where we are required to do so by law, to safeguard public safety, and in risk of harm or emergency situations. Only the minimum information for the purpose will be shared.

### **How long we keep your personal information**

We will only keep your personal information for as long as the law specifies or where the law does not specify this, for the length of time determined by our business requirements and in line with the council's data retention policies. All data will be anonymised for the final evaluation report. All personal data collected will be destroyed safely and securely by the end of the Contract which is 31<sup>st</sup> December 2022.

### **When we transfer your personal information beyond the UK**

- This service does not transfer your information outside the UK.
- We do not routinely share data with any organisation outside the UK, but our website is available across the internet, and we communicate with applicants and stakeholders wherever they are.

### **When we make an automated decision about your personal information**

This service does not make any decisions using computers or programmes that don't involve a human being when using your personal information.

### **Rights of individuals**

You have certain rights in relation to the council's use of your personal information.

To find out more about how these rights apply in particular circumstances, please refer to our [Guide to exercising your rights](#) or alternatively visit the Information Commissioner's web site at [www.ico.org.uk](http://www.ico.org.uk)

If you wish to exercise your rights or to raise a concern about the handling of your personal information by the council, please contact our Information Governance Team at [informationgovernance@bolton.gov.uk](mailto:informationgovernance@bolton.gov.uk).

If you are still unsatisfied you should contact **The Information Commissioner's Office** by post at the ICO, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or by telephone: 0303 123 1113

### **Updates to Privacy Notice**

We may update or revise this Privacy Notice at any time so please refer to the version published on our website for the most up to date details.