

FUTURE BRIGHT PRIVACY NOTICE

The Future Bright initiative is run by the West of England Combined Authority (WECA).

Participation in this programme is voluntary, and your choice should be informed.

Before you choose whether you want to become a Future Bright participant we would like to explain a few things about our use of your “personal data” in this programme and how we will protect your privacy rights.

After you have read this privacy notice, and understood what it says, you will be asked if you would like to participate in our Future Bright initiative. If you agree to proceed your assigned Career Progression Coach will be responsible for working with you to identify training and support services best suited to your needs and plan your career progress journey.

You may withdraw from participation in this programme at any time should you wish to.

Who are “we”?

WECA is the “data controller” for Future Bright. That means we have the responsibility for keeping your personal data safe, for using it lawfully, and for ensuring your rights to privacy are respected.

What is your “Personal Data”?

Personal data is information which is about you and which identifies you as an individual. This means it could be used to make decisions which have a direct impact on you. The purpose of this notice is to explain how we will use the information you give to us if you become a participant, and what we will use it for.

Data protection law sets down the rules for data controllers (such as WECA), and rights for the people (known as “data subjects”) whose information is held by them (such as you).

As a data subject, you have rights under the law of data protection.

Transparency: what we need to tell you

You have the right to be informed by us about:

- what personal data we would collect from you as a participant
- how we would use it, and for what purpose
- who we would share your information with, and why
- Your other data subject rights and how to exercise them

Purposes: why do we want to use your information

Our primary aim is to help you to find a path towards a career that is right for you and which benefits you by increasing your income, improving your job satisfaction and job security.

Successful career outcomes for our participants is intended to contribute to our broader aim of furthering the growth of the local economy in the West of England region.

Increasing your job security and earned income is also expected to reduce your dependence on Government funded benefits and help you prepare for the transition to the Universal Credit system.

We also want to test the effectiveness of Future Bright as a “pilot” project. We have just developed a new approach to providing support to people who would benefit from increased income and/or job security. This is the first time this new method is being tried out and we want to be able to evaluate how well it works. The purpose of evaluation is to inform the Government about better ways of helping people in other regions to realise their career potential and increase their earnings. This is not intended to have any impact on you personally, so it will not involve using or sharing information which can identify you.

If you would like to share your own story as a Future Bright participant, and have it published in our report for others to see, your Coach may invite you to be considered as a special “case study”.

What kind of personal data will we collect and record

Your coach will discuss a range of questions with you to build an understanding of where you are on your career path, what you would like to achieve, and any challenges you feel you are facing right now. This will include discussion about your current financial situation and the benefits you claim. It may also include physical or mental health issues if these have an impact on assessing suitable career paths for you.

Your Coach will ask you to tell her/him about yourself, your job skills and interests, and the challenges you may be facing which we may be able to help you with. Your Coach will keep written notes about your conversation to record information which will be used to plan the best way to support you. Your coach will also keep records of what training you participate in and support services you choose to take, assistance and advice provided to you, and your feedback on how helpful this is. This record of your journey as a participant will be stored by us on a secure computer system. The record will include information which can identify you (such as your name, contact details and you National Insurance number).

Only a small number of people who are working for us on this project will be allowed to see the information) which can identify you as an individual. They will only use this personal data if they need it to contact you or to organise your sessions with any training providers or career support services you have agreed with your coach.

Confidentiality

We want you to feel you can speak freely and openly in discussions with your Career Progression Coach. We understand that a relationship of trust may only develop over time but we feel it is important that you know, from the start, that participants in this programme will not be compelled to provide personal information they do not wish to share. Personal information which you choose to share with your Career Progression Coach (CPC) will be treated as confidential. This means it will not be accessed internally by any of our staff except where required to provide you with support you have agreed to. We will not share it externally with other authorities or private businesses unless you give us your permission to do so.

We are open to considering any aspect of your life which you feel is relevant to your employment situation. This may include information which you feel is sensitive or private so it is important that you feel you can trust your coach to keep this information safe and not share it with others.

The only exception to this would be if you told your coach something which had to be shared with others to protect you, or other people, from serious harm. We also have a duty to tell the police if you told about a very serious crime or a terrorist threat. Even in such exceptional cases you would still have the right to be informed about such reporting (what information we need to report, with whom, and for what purpose) so long as this would not increase the risk of harm to others.

Sharing of your personal data with others

As a participant, your Coach will advise on opportunities we can offer you to support your career progression. This may include training, confidence building and assessment of your current employment prospects. Often training and support services will be delivered by external providers. If you choose to accept the support offered, we may need to give the provider your name and contact details so that you can be enrolled on, and contacted about, the course or support service.

Information about your participation and outcomes will be shared with professional evaluators for the purposes of preparing statistical reports about the success of the methods used by Future Bright. This will not include your name, address or any data which may be used to identify you as an individual.

The funding for this initiative is provided by a Government grant from the Department for Work and Pensions (DWP). We will share information with DWP for the purpose of demonstrating our progress in rolling out the Future Bright Initiative and evaluating its methodology. This will not include information which can be used to identify you or used to take decisions which may impact on you as an individual.

Employers

If you tell us that you need more support from your current employer and request our involvement, we may offer to communicate with your employer to discuss your situation and how it could be improved. This discussion may involve sharing some of the information you have given us about challenges you face. Before any of your information is shared in this way your coach will tell you about what may be included in such a discussion and then ask for your permission to share this information with your employer. This is called "consent". We will not share any of your information with your employer without your consent.

We may also speak to your employer about their employees in general, who may be in scope for support from the project, without identifying you individually.

How long will we keep your personal data?

Information which cannot identify you will be retained after your participation has ceased and will be used only for statistical and research purposes.

Information which can identify you will be retained for a maximum period of 6 years. It will be used only for the purposes of contacting you to ask you if you would like to tell us about the longer-term outcomes of your Future Bright participation.

What happens if you no longer wish to participate in the Future Bright programme?

You may choose to withdraw from your participation in the Future Bright programme at any time.

It would be valuable for us to understand why the programme is no longer of interest to you for our evaluation of the pilot so we would simply will ask you for your feedback on your experience and reasons for withdrawal. If you agree we would also like to keep your contact details so that we may invite you to re-join the programme at some later stage when it may be of more interest to you. However, if you do not want us to contact you again we will respect your wishes and ensure that no further contact is made unless you tell us you have changed your mind.

Your information will be retained on our secure system in case you choose to participate again in the future.

You may also request that we remove any details which can identify you from our records and we shall do so.

You have the right to access the personal data we hold about you.

To request a copy of your records you may submit a "Subject Access Request".

Your request for your records must be in writing and may be sent us by post or email (see contact details below). To confirm your identity your request should include copies of an identity document (e.g. your driving license or passport) and proof of your address (e.g. a copy of a utilities bill or bank statement).

Contact for privacy concerns and Subject Access Requests

If you have any concerns or questions about our handling of your personal data, or if you wish to submit a Subject Access Request, please contact:

Louisa_gosling@bathnes.gov.uk

Louisa Gosling
Information Governance Manager
BANES
Guildhall
Bath
BA1 5AW

Your right to appeal

If you are not satisfied by our response to your concerns you may appeal to the Information Commissioner's Office who is the regulator for data protection issues. They will investigate your complaint and make a decision about what we need to do.

Information Commissioner's Office
Wycliffe House Water Lane, Wilmslow SK9 5AF
03031231113
Email: casework@ico.org.uk