

## **FUTURE BRIGHT PRIVACY NOTICE**

Future Bright is funded and run by the West of England Combined Authority (WECA) in partnership with Bristol City Council (BCC), Bath and NE Somerset Council (BNES), and South Gloucestershire Councils (SG).

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

Before you choose whether you want to become a Future Bright participant or not, 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 Future Bright. If you agree to proceed your assigned Career Progression Coach will be responsible for working with you to provide personal career coaching, to help identify training and support services best suited to your needs and plan your career progression journey.

### **Who are we?**

Your Local Council and WECA are the ‘joint data controllers’ for Future Bright. That means we both have 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 your Local Council and WECA), and rights for the people (known as ‘data subjects’) whose information is held by them (such as you).

### **Transparency - what we need to tell you**

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

### **What is our legal basis for using your information for Future Bright?**

Data protection rules set out certain conditions which must be met for the lawful use of other people's information. We are also obliged to tell you which condition applies to Future Bright and its participants.

WECA, and the Council partners in Future Bright are public authorities with official functions which are defined in Government legislation. We have 'official authority' for our involvement in this project, including its use of participant information, because it is in line with this official role and our related responsibilities.

As personal information collected from Future Bright participants includes 'special categories' we also rely on a further condition. Future Bright's aims include improving understanding about any career challenges or discriminatory treatment our participants may face due to their physical or mental health conditions, disabilities, criminal record, or ethnicity. This use of participant information is lawful because it meets a 'substantial public interest'.

### **Why do we want to use your information?**

We collect your data in order to deliver Future Bright to you. Our primary aim is to help you to reach your career progression goals and find a path towards a career that is right for you. This will be through personal career coaching and helping you to access training and support to enable this, which in turn benefits you by increasing your skills, attitude, income, job satisfaction and job security.

Successful training and career outcomes for our participants are intended to contribute to our broader aim of furthering the growth of the local economy and the skillset of the workforce in the West of England region.

### **What kind of personal data will we collect and record?**

We will ask you to provide the following types of information:

- your name, address and contact details;
- your date of birth;
- your employment details;
- your accommodation situation and landlord;
- the type of benefits you are claiming;
- your first language;
- how many children you have, and whether you are a sole carer;
- your gender;
- your ethnicity;
- any disabilities, learning difficulties, health conditions (including any mental health, drug or alcohol issues);
- if you are a care leaver;
- if you have a role as a carer; and
- any past criminal offences.

Your coach will discuss a range of questions with you to build an understanding of where you are on your career path; including your current situation, what you would like to achieve, and any challenges you feel you are facing right now. Your coach will ask you to tell them about yourself, your job skills and work history, your education and your training needs which we may be able to help you with.

Your coach will keep written notes about your conversations. 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. These records will all contribute to your journey as a participant in Future Bright and will be stored on a database.

### **How will we use your information?**

From all the information you provide, your coach will develop a personalised action plan with you to help you achieve your goals and progress in your work situation (including learning, training, assistance and support services). All information recorded will be used to plan the best way to support you and to track your progress.

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 to:

- deliver services and support to you;
- to organise and/or review your sessions with any training providers or career support services you have agreed with your coach;
- to make you aware of any updates, changes or promotions in relation to Future Bright;
- to contact you about your participation on the project;
- to ask about your experience as a participant to be able to review the delivery and operation of Future Bright;
- to monitor the delivery of the project and to perform research and statistical work.

Statistics, drawn from the participant information held on the Future Bright database, will be used to evaluate and report on Future Bright. This statistical information will not include anything which could identify you, and so it cannot be used to make any decisions which could affect you directly or personally. We report to Government, Local Authorities and partners about the outputs and outcomes of the project to demonstrate the impact of the project and this information may be published.

Your information will not be used for profiling or to make automated decisions.

You may be asked by your coach if you would like to share your own story as a Future Bright participant and be considered for a case study. This may then be published in line with your preferences selected on the form.

The WECA website uses cookies, but they do not identify users and we only use them to gather statistical information. Unless input from a user directly into a form, the site does not capture and store any personal information about individuals who access it.

### **How do we protect your information?**

We are committed to doing all that we can to keep your data secure. We have set up systems and processes to prevent unauthorised access or disclosure of your data.

The record of your journey as a participant with Future Bright will be stored by us on a secure database. The record will include information which can identify you (such as your name and contact details). Access to these databases will be restricted to those who are entitled to view and process your data. If the information is collected in a paper format, we will also ensure it is kept secure and destroyed when no longer required.

Some information may be stored outside of the database and we'll do what we can to make sure we hold records about you in a secure way, and we'll only make them

available to those who have a right to see them. Examples of our security may include:

- encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password);
- pseudonymisation, meaning that we'll use a different name so we can hide parts of your personal information from view. This means that someone outside of the organisation could work on your information for us without ever knowing it was yours;
- controlling access to systems and networks allowing us to stop people who are not allowed to view your personal information from getting access to it;
- training for our staff to make them aware of how to handle information and how and when to report when something goes wrong.

### **Confidentiality and sharing of your personal data with others**

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. Personal information which you choose to share with your coach will be treated as confidential. 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 tell us about a crime, fraud 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.

Information which can identify who you are (including information such as your name, address, contact details and photographs of you) will only be accessed by authorised Council or WECA personnel working on Future Bright. This may include other departments within WECA or your local authority to support the delivery of the service you may receive. Personnel includes both employees and any external agents/partner organisations who may be contracted by any Party to work for Future Bright, and who are legally bound to comply with that Party's data protection instructions and policies about use of participants' personal data.

As a participant, your coach will advise on opportunities available to support your career progression. This may include various forms of training and or support. Often training

and support services will be delivered by external providers. If you choose to proceed with any support discussed, we may need to give the provider personal details such as your name and contact details so that you can be enrolled on, and contacted about, the course or support service.

Future Bright will not transfer your data to any other countries. If you choose to access any support or training providing by another provider, you will need to refer to their privacy notice for the way they handle your information.

If you are referred to Future Bright by another professional, it may be beneficial to update them at stages regarding your progress. There may also be occasions where we work in partnership with another provider or your employer to help aid your progression. 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.

### **How long will we keep your personal data?**

Information which can identify you will be retained for a maximum period of 6 years from when your participation has ceased on the project. Information which cannot identify you will be retained after this period and will be used only for statistical and research purposes.

Legislation tells us how long we need to keep some information to perform any statutory or contractual duties. Some data must be held to meet the requirements for public grant funding and auditing requirements. Personal information kept for this reason will be restricted to a minimum.

### **What happens if you no longer wish to participate in Future Bright?**

You may choose to withdraw from your participation in Future Bright at any time. It would be valuable for us to understand why the programme is no longer of interest to you so we would simply will ask you for your feedback on your experience and reasons for withdrawal.

If at this point 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 refuse information or object to the usage of your information**

You have the right to refuse to provide information which is requested of you. In some cases, your refusal may mean you can no longer be a Future Bright participant, but we will explain this to you before you decide.

You also have the right to object to our use of your information. This means you can request that we stop using any information that you have already given which can be used to identify you, and to request that we delete this from our database.

## **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 to 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).

You have the right to rectification of any incorrect or incomplete data we hold about you and can contact us with the contact details below.

## **Who to 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 or Subject Access Request, please contact the Data Protection Officer at your Local Council.

More information for the Local Councils can be found below:

Bath and North East Somerset - <https://beta.bathnes.gov.uk/council-privacy-policy>  
For any concerns or questions contact [data\\_protection@bathnes.gov.uk](mailto:data_protection@bathnes.gov.uk)

Bristol City Council - <https://www.bristol.gov.uk/data-protection-foi>  
For complaints around GDPR compliance contact [data.protection@bristol.gov.uk](mailto:data.protection@bristol.gov.uk)  
For requests to access a copy of the personal data held on you contact [subjectaccessrequest@bristol.gov.uk](mailto:subjectaccessrequest@bristol.gov.uk)

South Gloucestershire Council - <https://www.southglos.gov.uk/council-and-democracy/data-protection-and-freedom-of-information/>  
For any concerns or questions contact [DPO@southglos.gov.uk](mailto:DPO@southglos.gov.uk)

## **Your right to appeal**

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

You can contact them at:

Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow  
SK9 5AF  
T: 03031231113  
E: [casework@ico.org.uk](mailto:casework@ico.org.uk)