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West of England Combined Authority’s Mayoral Priority Skills Fund – Future Bright

PARTICIPANT PRIVACY NOTICE – Future Bright

The Mayoral Priority Skills Fund (MPSF) is funded and run by the West of England Combined Authority. The Future Bright (FB) initiative is funded and run by the West of England Combined Authority in partnership with the Local Councils for Bristol City, Bath and North East Somerset and South Gloucestershire.

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

Before you choose whether you want to become a MPSF/FB 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 MPSF/FB initiative.

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”?

West of England Combined Authority (or The Combined Authority) and your Local Council are the joint data controllers for the MPSF/FB initiative. That means we have responsibility to keep 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. This project is led by the West of England Combined Authority and delivered by your Local Council.

Data protection law sets down the rules for data controllers (the West of England Combined Authority and your Local Council), and rights for the people (known as “data subjects”) whose information is held by them (such as you).



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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

Full details can be found at <https://ico.org.uk/your-data-matters/>



What is our legal basis for using your information for the Mayoral Priority Skills Fund (MPSF) – 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 the MPSF/FB and its participants:

- Participation in the programme is voluntary and required to read through this privacy notice to ensure you understand how we process your data.
- To ensure we meet your personal needs as a learner on the programme, we capture personal information (including special category data).
- To ensure targeted groups of individuals are enrolling on to the programme, we capture personal information (including special category data).
- As personal information collected from MPSF/FB participants includes “special category data” such as information about your ethnic origin, or health, which require more protection because it is sensitive, we also rely on a further condition. MPSF/FB aims include improving understanding about any career challenges, or discriminatory treatment our participants may face due to their physical or mental health conditions, disabilities, or their ethnicity. This use of participant information is lawful because it meets a “substantial public interest” – supporting equality of opportunity or treatment.
- The West of England Combined Authority, and the Council partners in the FB project, 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.



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Purposes: Why do we want to use your information?

We collect your data to deliver the MPSF/FB service 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 career coaching and mentoring and helping you to access training and support, enabling you to increase your skills, income, and job security.

We also want to reward your engagement with the programme through issuing you a digital badge as recognition of your personal achievement. More about this is below.

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;; employment details; your first language; your qualifications; whether you have childcare responsibilities; whether you are a carer; your gender; your ethnicity; any disabilities, learning difficulties, physical or mental health conditions, your accommodation/housing situation, the type of benefits you are claiming, if you are a care leaver 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 complete, support services you choose to take, assistance and advice provided to you. These records will all contribute to your journey as a participant on FB and will be stored on a database.

If you exit the programme before completion, we will ask for your reasons for exiting the programme.



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Digital badging

A key part of you being involved in this programme is to provide you with recognition that you have taken part and what you have achieved including skills you have developed. We will do this by issuing a digital badge or badges when you accomplish key milestones which may be completion of the programme.

Your organisation or the Combined Authority **may** issue you with an electronic badge which will detail what you have achieved. The programme will provide more information on this at the right time, but when you accept a badge, you can carry this with you on social media platforms and on your CV.

To issue you a badge your name and email address will be shared with Badge Nation.



How does Badge Nation use your data?

Badge Nation is led by a partnership between Real Ideas and Future Creators; therefore, personal data will be shared with both organisations.

Badge Nation is committed to protecting and respecting your privacy, and they will only use your personal information to administer your account and to provide the products and services you requested from them as part of Badge Nation.



How will we use your information?

We will use the information you provide to develop a personalised action plan with you, to help you complete the programme, achieve your goals and progress in your employment, skills, or training situation. 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.
- To contact you about your participation in the programme; to ask about your experience as a participant to be able to review the delivery and operation of the MPSF/FB initiative. This may be whilst you are on the programme, or after you have finished the programme. This may be conducted internally or by an external agent.
- To monitor the delivery of the programme and to perform research and statistical work.
- To make you aware of any updates, changes, or promotions in relation to FB.



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Statistics, drawn from the participant information held on the MPSF/FB database, will be used to evaluate, and report on the programme. 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 MPSF/FB participant and be considered for a “case study”. This may then be published in line with your preferences selected on the form.



How do we protect your information?

We are committed to do 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 the programme 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.



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Confidentiality and sharing of your personal data with others

We want you to feel you can speak freely and openly in discussions with your 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 and 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 mentor 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 (including information such as your name, address, contact details and photographs of you) will only be accessed by authorised personnel working on MPSF/FB. This may include other departments within the West of England Combined Authority and/or your Local Council, 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 the MPSF/FB, 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. We will also need to confirm, with the provider if you have started and completed the course.

The MPSF/FB 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 the programme 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 mentor will tell you about what may be included in such a discussion and then ask for your permission to share this information.



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Data shared with the Department of Levelling up, Housing, and Communities (DLUHC)

The Mayoral Priority Skills Fund has partially been founded by the UK Shared Prosperity Fund. For this reason, the Combined Authority will need to share outputs and outcomes with DLUHC. Data shared will not be personal or identifiable data, however, we will report intelligence around overall progression 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 the programme?

You may choose to withdraw from your participation in the MPSF/FB 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 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 MPSF/FB 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 request that we delete this from our database.



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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 licence or passport) and proof of your address (e.g., a copy of a utility bill or bank statement).

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



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 the Data Protection Officer at your Local Council. See details 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

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

ico.

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

03031231113
casework@ico.org.uk