



## **Building Bridges Programme Privacy Notice**

### **Background**

The Building Bridges programme treats the information we hold about our programme participants very seriously and we will comply with the requirements of the General Data Protection Regulation (GDPR) (EU) 2016/679.

The Building Bridges Programme is the local implementation across Swindon and Wiltshire of the national Building Better Opportunities (BBO) programme, which is jointly funded by the European Social Fund and the National Lottery, via the Big Lottery Fund. The Managing Authority for the national BBO programme is the Department for Work and Pensions ESF Team.

The Building Bridges Programme is delivered by a partnership of 40 organisations, led by Community First, working collaboratively under a legal Partnership Agreement

The principles that we operate for all our participant data are:

- We only capture and store the minimum amount of data we need to provide our service and meet the needs of our funders.
- We will only share participant information with the Big Lottery Fund, or other authorised bodies, in relation to the operation of the BBO Programme and it will only be shared in a secure manner.
- We will not share any of our participant data to be included on any marketing or mailing lists
- We are required to store participant data in both hard copy and electronic formats to meet the needs of our funders.
- We have put in place a secure Management Information System in order to ensure that participant data can be shared and stored as securely as possible between our programme partners.
- Each of our partner organisations has a data protection and security policy in place and the Building Bridges Partnership Agreement details how the partners will work together to ensure participant data is protected when they are working collaboratively to support them.
- All participant information, both hard copy and electronic, will be stored securely and retained at least until 31 December 2026 to meet the requirements of our funders.
- This information will be used to evaluate this project and to report to the Big Lottery Fund and European Social Fund for monitoring purposes. Participants may be contacted by these funders to discuss their involvement in the project.
- We will dispose of all participant information, both hard copy and electronic, in a secure manner after 31st December 2026 or later if required by our funders.

If participants wish to view the information that the programme holds about them, they should formally apply in writing to the Building Bridges Programme Manager, Community First, Unit C2 Beacon Business Centre, Hopton Park, Devizes, Wiltshire, SN10 2EY.



If participants would like to find out more about our data protection and security for the programme, they should visit our website at [www.buildingbridgessw.org.uk](http://www.buildingbridgessw.org.uk) or contact our programme team on 01380 732821 or [hello@buildingbridgessw.org.uk](mailto:hello@buildingbridgessw.org.uk).

This Privacy Notice will be made publicly available through our programme website and participants will be made aware of its existence when joining the programme.

### BBO Programme Data

The Managing Authority has confirmed that the legal basis that they will be using to collect, store and process all of the required participant data collected on the BBO Programme will be 'Public Task', meaning that the processing is necessary for performing a task that is in the public interest or an official function and has a clear basis in law.

As a result of the programme being delivered under the basis of 'Public Task', the Managing Authority and Big Lottery Fund have informed us that there is no requirement for participants to provide consent on the standard BBO Programme documents for their data to be collected, stored and processed.

The Department for Work and Pensions ESF Managing Authority is the Data Controller for all personal data required to help deliver the BBO Programme. Information about how and why the Data Controller uses the BBO Programme personal data can be found at [www.gov.uk/dwp/personal-information-charter](http://www.gov.uk/dwp/personal-information-charter).

The Big Lottery Fund and all partners within the Building Bridges Programme will be Data Processors for this information.

### Additional Building Bridges Programme Data

In addition to the data required to complete the standard BBO Programme documentation, the Building Bridges Programme also captures some additional participant data to help us operate our programme more effectively and meet the needs of our funders.

This information includes:

- Our online referral process
- Referral information from external organisations already supporting individual participants
- Photographic consent forms
- Participant's economic status self-declaration form
- Participant's needs analysis form
- Participants' self-assessment of their wellbeing, using the Warwick Edinburgh Wellbeing Measure Score
- Participants' self-assessment of their readiness for employment
- Parental consent form for participants aged Under 16

This information is used by the Building Bridges Programme in order to improve our needs analysis and action planning with participants. Participants who join the programme on or after the 25<sup>th</sup> May 2018 will be asked to give their consent for this data to be captured and stored as part of the programme.

This information will only be shared with the Big Lottery Fund, or other authorised bodies, in relation to our operation of the BBO programme and any analysis will be undertaken in an anonymised fashion – e.g. calculating the average improvement in wellbeing self-assessment score for all our participants.



Community First, as the lead partner for the Building Bridges Programme will be the Data Controller for participant information captured in this way and our partner organisations will be Data Processors.

### Non-Building Bridges Participant Data

A number of our partner organisations capture additional participant data as part of their standard processes to help them operate more effectively.

Where this is the case, that partner organisation will have a separate Privacy Notice in place that details how the information will be captured, stored and processed. The partner organisation will put in place separate consent arrangements to capture this data and they will act as the Data Controller for it.

### Building Bridges Programme Referrals

All participant referrals to the Building Bridges programme should be made via the online referral process on our programme website.

If a participant makes a referral directly to one of our programme partner organisations, that partner will either ask the individual to complete the online referral process or complete it on their behalf.

The online referral process has been designed to capture the minimum necessary personal information to enable us to contact the potential participant, understand how the programme might help them and match them to the most appropriate partner organisation to help support them.

If the individual becomes a programme participant, this data is then transferred within the secure Management Information System to form part of the participant's file.

If a referral request does not result in the individual becoming a Building Bridges participant within six months for whatever reason, all data captured in the referral process will be securely destroyed. Although this period may appear slightly long, our experience to date is that obtaining proof of eligibility for some participants with complex circumstances can take up to four months and many other potential participants can take several months before they decide to engage fully with the programme. We do not want to exclude potential participants who fall into these categories unnecessarily.

If the potential participant subsequently wishes to re-engage with the Building Bridges Programme, they would be asked to complete a new online referral.

The online referral process makes potential participants aware of how the data they are providing will be managed.

### Participant Rights to View Data

Participants have a right to view all of the data that the Building Bridges Programme holds on them and any requests should be made formally in writing to the Building Bridges Programme Manager, Community First, Unit C2 Beacon Business Centre, Hopton Park, Devizes, Wiltshire, SN10 2EY.

As all required participant data is being collected, stored and processed under the basis of 'Public Task', participants cannot claim the right to erasure ("right to be forgotten") or the right to portability of their data.



Participants do, however, have a right to object to their data being processed and any such requests would be considered by the Managing Authority. In the first instance, any such requests should be made formally in writing to the Building Bridges Programme Manager at the address above.

#### Retrospective Application of Privacy Notice

The current advice from the Big Lottery Fund is that the Department for Work and Pensions ESF Managing Authority will be adopting a going-forward position for the updated Privacy Notices arising from the General Data Protection Regulation.

As a result, this Privacy Notice will only be issued to participants that join the Building Bridges Programme from the 25th May 2018 onwards. We will not be issuing copies of this updated Privacy Notice to participants that have already joined or left your project before this date.

#### Programme Delivery Staff

The Building Bridges Programme maintains a circulation list of staff within our partner organisations that are involved in the delivery of the programme.

These circulation lists are necessary for us to maintain efficient operation of the programme and inform programme delivery staff of learning and governance updates from the national BBO Programme.

The staff circulation lists are amended as we are informed of staff changes and reviewed on a quarterly basis.

A full review of staff on the circulation lists was undertaken prior to the introduction of the General Data Protection Regulation and staff can elect to be removed from the lists at any time.