**Building Bridges Programme Swindon & Wiltshire 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 Data Protection Act 2018 (DPA 2018), and the UK General Data Protection Regulation (UK GDPR).

The Building Bridges Programme is funded by The National Lottery Community Fund, with match funding from Community First, to support people who face significant barriers & challenges to access and sustain education and employment. The funding is managed by the Community First Head of Employability Programmes.

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

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.

Participant Data Principles

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 to participants and meet the needs of our funders.
- We will only share participant information within our partnership to meet the needs of our participants and if this is required it will be done in a secure manner.
- Participants under the age of 18 will require consent from a parent, guardian or suitable alternative adult to be able to join the programme.
- If appropriate, we may share progress reporting with the referrer where this is not the individual themselves to help ensure that the support provided by the programme remains relevant and identify any further support required.
- Any external reporting to The National Lottery Community Fund, Community First or other authorised bodies will be anonymised to protect participant privacy unless agreed by the individual themselves (e.g. for case studies).
- We will not share any of our participant data to be included on any marketing or mailing lists
- We capture and store participant data in both hard copy and electronic formats to meet the needs of our internal processes and funders.
- We have put in place a secure Management Information System in order to ensure that participant data can be stored and, if necessary, shared 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 30th April 2034 to meet the requirements of our funders.

- We will dispose of all participant information, both hard copy and electronic, in a secure manner after 30th April 2034 or later if required by our funders.

- Details of any safeguarding support provided are retained in a separate confidential system within Community First and all associated records will be retained in line with legal recommendations.

Data Controller

Community First is the Data Controller for the Building Bridges programme.

The Building Bridges partner organisations act as Data Processors on behalf of Community First.

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 Data

The Building Bridges programme captures the following information about the participants that we support:

- Our referral processes
- Referral information from external organisations already supporting individual participants
- Contact information, including name, postcode, telephone numbers and email address
- Identifying details, including date of birth and national insurance number
- Ethnicity, gender at birth, current gender identity and preferred personal pronouns
- Economic status and right to work in the UK
- Offender or ex-offender status, including any MAPPA restrictions
- Individual personal circumstances including situation, barriers & challenges to employment & education
- Individual needs analysis and action plans
- Individual progress reports, including referrals to other Building Bridges partner organisations, volunteering, employment experience and educational attainment
- Participants' self-assessment of their health & wellbeing, using questionnaires and forms such as the Warwick Edinburgh Wellbeing Measure Score
- Any health or medication requirements that may affect the support we are able to provide
- Participants' self-assessment of their readiness for employment
- Parental consent (or equivalent) form for participants aged Under 18
- Photographic and/or video consent
- Case studies
- Records of any safeguarding support provided

Where possible, participants will be given the right to opt out of providing non-essential information or tick "prefer not to say" as an option.

Data will not be used or shared for any commercial or marketing purposes. At all times participant information will be kept securely, and nobody will have access to it that shouldn't.

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 with permission to do so.

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.

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 apart from anonymised records of age, postcode and reason for not progressing to full participant status. We use this anonymised data to help analyse and improve our services in the future.

Although this six-month 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 to access this information should be made formally in writing to the Head of Employability Programmes, 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 or contact our programme team on 01380 732821 or buildingbridges@communityfirst.org.uk.

Subject Access Requests

Any Subject Access Requests relating to the Building Bridges Programme should be addressed for the attention of the Head of Employability Programmes via the email address buildingbridges@communityfirst.org.uk.

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.

The staff circulation lists are amended as we are informed of staff changes and reviewed on a quarterly basis. Staff can elect to be removed from the lists at any time.

**Issued By:**

Name: Dave Potts
Position: Head of Employability Programmes
Date: 1st April 2026