Future Wolverton Limited - Confidentiality & Data Protection Notice and Information April 2024

Introduction

1. At Future Wolverton we respect your privacy and take great care with personal information we hold about you.
2. This policy sets out how we collect and handle information about you when you apply for a job, a training placement or to do volunteer work with Future Wolverton.

Who we are

3. Future Wolverton is a Registered Society under the Co-operative and Community Benefit Societies Act 2014, registered number 32016R.

Your rights under data protection laws (2024)

4. Under data protection laws, you have a number of rights relating to data protection: These include the right to:
    1. Be informed
        1. what data an organisation holds about you,
        2. why the information is held,
        3. what it is used for.
    2. Make a subject access request (SAR) to find out if an organisation is using or storing your personal data and get copies of it.
    3. Challenge the accuracy of personal data held so that it may be corrected if necessary
    4. Ask the organisation to delete personal data that it no longer needs to hold
    5. Make a data protection complaint to tell an organisation if you have concerns about how they are processing or using your data.
    6. Further information about these rights can be found on the Information Commissioner's Office website: https://ico.org.uk/for-the-public/personal-information

How to get in touch with us

5. You are not required to pay any charge for exercising your rights.
6. If you make a request, we have one month to respond to you.
7. You can get in touch about personal information we hold about you or exercise any of your rights by:
    1. email: info@futurewolverton.org
    2. writing to Future Wolverton Limited, The Old School, Old Wolverton Road, Old Wolverton, Milton Keynes, MK12 5NH.

    If necessary, please include any details that will enable us to identify you. We may ask you to provide us with proof of identity before any action is taken or information is disclosed to avoid disclosing information to an imposter. Sometimes, these rights are subject to certain conditions and limitations.
8. If you are unhappy with our response to a data request you have made, you may contact the Information Commissioner's Office https://ico.org.uk/for-the-public/personal-information/.

How we collect information about you

9. We collect information when you complete an application form to work for us, a volunteer application form to volunteer with us or an application form to take part in a training or education programme with us.
10. If you begin employment or a training placement with us, we will put together a file about your employment or placement with us. We keep the information in

this file secure, and will only use it for matters that apply directly to your employment or education/ training.

11. Future Wolverton wants to ensure that your personal data is accurate and up-to-date, therefore it is important that you inform us of any changes to your personal circumstances, such as a change of address.

What information we process about you

12. The sort of personal information we hold about you if you are employed by Future Wolverton usually includes:
    1. your application form and any references
    2. your contract of employment and any amendments to it
    3. correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage company confirming your salary
    4. information needed for payroll, benefits and expenses purposes
    5. contact and emergency contact details
    6. records of holiday, sickness and other absence
    7. information needed for equal opportunities monitoring
    8. records relating to your career history, such as
        1. training records,
        2. appraisals and other performance measures,
        3. attendance and,
        4. where appropriate, disciplinary and grievance records.
13. If you are on an education/training programme with us the sort of information we will usually hold includes:
    1. an application form to join the training programme
    2. record of attendance
    3. individualised personal training plan
    4. records of any formal accredited training completed
    5. contact details and emergency contact details
    6. progress reports which summarise achievements
    7. personal action plans
    8. Records of 1-1 discussions and other meetings and notable interactions or incidents
    9. a copy of your EHCP and other records if provided to us by you or a council/ Local Authority or other relevant agency
    10. any accidents that may have occurred whilst undertaking training with us
    11. records of achievements and quotes about your achievements from support staff
    12. record of activities partaken
    13. a curriculum vitae (CV) which we might develop with you
    14. information provided about state benefits
14. If you are a volunteer with us, the sort of information we usually hold includes:
    1. a volunteer application form
    2. contact details and emergency contact details
    3. records of any training completed whilst volunteering
    4. any incidents that may have occurred, involving you, whilst performing your volunteer role

Looking after your information

15. We use strict procedures and security features to protect your information and prevent unauthorised access.
16. For the administration of your employment and to comply with certain statutory obligations, we store your personal information in paper form in a locked cabinet kept within a secure environment and electronic form using up-to-date cloud-based software.
17. As a small organisation, we have chosen to use trusted outsourced online services where this will provide a more secure, efficient service to process information about you. These outsourced services include: the provision of email services and data storage.
18. Sometimes we will pass information about you to third parties, where we are legally obliged to do so or where we need to comply with our contractual duties to you. For example, we would confirm the dates and nature of your employment with Future Wolverton to a prospective employer. We provide information to your provider if you join a pension scheme. We will share information with other parties who may be responsible for part or all of your employment, for example, processing payroll information. We will share information with HMRC for UK taxation purposes.

How we use your personal data and the legal bases

19. If you are an employee of Future Wolverton,
    1. We use your personal data to administer payroll, pensions, training and appraisal, monitor equal opportunities, employ you and manage your access to various services such as our computer systems, in order to fulfil the contract between you and us.
    2. In addition, we are legally obliged to collect, retain and disclose certain information about you, for example to ensure you pay the correct rate of taxation, to fulfil our statutory reporting duties and comply with other obligations.
    3. We may also use special category personal data, such as ethnicity, disability and sexual orientation data to monitor and promote equality and diversity at Future Wolverton should you choose to disclose this information. The legal basis for this is your explicit consent, which you are free to withdraw at any time.
20. If you are on an education/ training programme with us,
    1. We use your personal data to complete any monitoring and evaluation returns to funders. This information will be anonymised.
    2. We may also share information with educational organisations and employers, about your achievements whilst participating on a training programme with Future Wolverton.
21. **Use of ICT Facilities**
    1. Names of employees of Future Wolverton are included on the Future Wolverton website.
    2. We may monitor the use of computer and telephone facilities for purposes such as
        1. preventing and detecting criminal acts,
        2. investigating unauthorised use,
        3. making sure that policies are being followed and
        4. for training and quality control.

3. Your work email address and contact details may be shared with third parties in connection with work/business activities.

Health

22. Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used in order to
    1. comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job or your ability to participate in a training programme, and
    2. whether any adjustments to your job might be appropriate.
    3. If you are an employee, we will also need this data to administer and manage any sick pay.

How long your personal data is kept

23. We will keep your personal information only for as long as it is reasonable to do so or in accordance with our legal obligations.

24. If you are on a training programme with Future Wolverton, a file relating to your training with the organisation will only be retained for as long as is necessary or for an agreed period. Necessary activities may include:
    1. Fulfilling and discharging the contractual obligations established between Future Wolverton and any funder of the training and the trainee.
    2. Providing information on the achievements of the trainee to employers, educational institutions and other organisations, as well as to the trainee themselves as part of their lifelong learning record. Trainees will be told that after an agreed period FW may not be able to provide them with a reference.
    3. If you leave Future Wolverton's employment, your personnel file is kept for not more than six years from the date you leave. If you were a member of a pension scheme, some information will be kept longer to allow payment of a pension.
25. If you are unsuccessful in your job application, we will hold your personal information for up to twelve months after we've finished recruiting the post you applied for. After this date we will destroy or delete your information securely.
26. A digital list will be securely stored on up-to-date cloud-based storage of all those for whom the organisation retains employment or training records. This list will be periodically reviewed, and information deleted after an agreed 5-to-6 year period.

Breach

27. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal information, we will promptly assess the risk to your rights and freedoms and if appropriate report this breach to the ICO (more information on the ICO website).

Staff Training

28. Staff will receive training every 3 years with regards to Data protection and confidentiality

Changes to this policy

29. This policy is annually reviewed by the Board of Future Wolverton.

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Last reviewed: 19th March 2025
Next review date: March 2026