

Future Frontiers Privacy Notice

Last updated: 11th June 2021

Next scheduled review: 11th June 2022

At Future Frontiers we take your privacy very seriously and are committed to processing data in accordance with our responsibility under GDPR. We ask that you read this Privacy Notice carefully as it contains important information on who we are, how and why we collect, store, use and share personal information, your rights in relation to your personal information and on how to contact us and supervisory authorities in the event you have a complaint.

Who we are

Future Frontiers Ltd. collects and uses certain personal information about you. When we do so we are regulated as ‘controller’ of that data under the General Data Protection Regulation, which applies across the European Union (including in the United Kingdom).

Article 5 of GDPR requires that personal data shall be:

1. processed lawfully, fairly and in a transparent manner in relation to individuals;
2. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
3. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
4. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay; kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
5. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The person responsible for our ongoing compliance with this policy is Dominic Baker, CEO, who will ensure this policy is regularly reviewed.

The personal information we collect and use

This policy applies to all personal data processed by Future Frontiers. All data collected and processed will be done based on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interest. This includes the data collected from the following persons:

- “Volunteers” of the Future Frontiers coaching programme i.e., someone who applies to be a volunteer coach on our programme
- “Students” who participate in our programme at school or in a business
- “School staff” who work at one of our eligible schools and who may be involved in the Future Frontiers programme.
- “Company contacts” who are volunteers or liaisons from one of our business partners
- “Supporters” who are individual donors and/or represent organisations which support or may support Future Frontiers.

Data collected

- **Volunteers** - First and last name, age, gender, ethnicity, employment status, university, degree title, graduation date, availability, email address, contact telephone number, permission to share details with vision aligned organisations.
- **Students** - First and last name, ethnicity, gender, school, date of birth, current/project grades, free school meal eligibility, survey response data, parental employment status (optional), parental university status (optional), school engagement indicators, school attendance, email address and phone number (over 16s), home postcode
- **School contacts** - First and last name, school name, email, contact telephone number, regional location, partnership status
- **Company contacts** - First and last name, school name, email, contact telephone number, regional location, partnership status
- **Supporters** - Full name, organisation, role, contact email, contact telephone number, contact address, information you share about your interests and communication preferences.

On our website, you may find links to the websites of third-party organisations (sponsors, partners, etc). These sites should all have their own Privacy Policies and as such we are not responsible or liable for any issues you may encounter, should you share personal information with them.

Sub-processors

Future Frontiers uses certain Sub-processors to assist it in delivering and evaluating our programme. Future Frontiers undertakes a commercially reasonable selection process by which it evaluates the security, privacy and confidentiality practices of proposed Sub-processors that will or may have access to or process Personal Data. Below is a list of authorised Sub-processors used by Future Frontiers, and their corresponding data protection policies:

- **Vedamo**

Coaching sessions take place on the website Vedamo. This requires our volunteers to sign up with some personal data and all sessions are recorded. These recordings will be securely retained for one month after the programme as per our safeguarding strategy. This data is managed in line with their privacy policy here: <https://www.vedamo.com/page/id/3/>

- **ImpactEd**

ImpactEd operates a secure, cloud-based Platform which processes Data in order to support school-led monitoring and evaluation. ImpactEd's Data Sharing Agreement can be found here: https://drive.google.com/file/d/1rploeddSgVdSNa44-P0UvvOfdfsjUBy_/view

- **Third Party Giving Platforms**

If you choose to donate to Future Frontiers via a third party, your data will be processed by them and then shared with us. Please see the relevant privacy policy for the giving platform you are using.

How we use your personal information - Students

We take all reasonable steps to ensure the personal data we collect is relevant and limited to what is necessary in relation to the purpose for which that data is requested. The information we collect from schools regarding the students participating in the programme relates directly to our ability to deliver a successful programme and to adequately monitor and evaluate our impact. Employee and volunteer access to information will be limited to what is necessary for them to undertake their roles delivering our programme and will be revoked when access is no longer required.

We will take all reasonable precautions to protect and secure your personal information securely regardless of whether it is obtained online or offline. All data, whether sensitive or non-sensitive, is secured with the highest level of physical and electronic processes and will not be kept any longer than is necessary.

Consent

In some instances, we will rely on obtaining student consent for use of their personal information. The legal basis for this is most commonly for where we would like to share your personal information with a partner (a ‘third party’) to track the impact of our programmes. We collect personal data, and sensitive personal data, about students for the following reasons and under the following legal bases:

Row	Type of data	Why we collect it	What do we do with it?	What is the legal basis?	Do I have to provide this information?
1	Pupil name, DfE Unique Pupil Number, school name, date of birth	To administer the Future Frontiers programme	Hold it on our internal systems, use it to liaise with teachers and coaches	Administration of a contract	This information is required for pupils to join
2a	Pupil phone number and email, gender, parental history of higher education, prior attainment, eligibility status for Pupil Premium and eligibility status for free school meals	To evaluate, monitor and continually improve our programmes, to inform stakeholders of our impact and to determine to what extent we are fulfilling our charitable purpose and mission	Hold this on our internal systems, share it with certain partners to track pupils’ educational attainment in the future	Legitimate Interests.	
2b			Share this information with pupils’ consent with other third parties	Consent	Pupils are not required to provide this information or consent
4	Pupil Ethnicity and Disability data (special categories of data)	To allow us to evaluate whether our programme has the same impact on pupils of different ethnicities and children with disabilities, and to enable us to make changes where this is not the case	Hold it on our systems for evaluation purposes, share with partner organisations if you have consented to us holding it		
5	Pupil images, sound recordings and video clips	To allow us to demonstrate our programme in action to funders and other stakeholders	Hold on our systems and use to develop promotional materials		

The organisations we will share pupil personal data (including ethnicity and disability data if provided) pursuant to our legitimate interests are charities and research bodies that support Future Frontiers and are listed as named Sub-processors.

How we use your personal information - Volunteers

The information we collect from volunteers is processed with explicit consent from the individual through their sign-up form. A limited amount of their data is shared with the appropriate School or Coach as is necessary for the effective delivery of our programme.

The sharing of volunteers' data beyond what is necessary for the programme delivery, will be outlined explicitly and volunteers will be asked for their consent. Where consent is relied upon as a lawful basis to process data, evidence of opt-in will be kept with personal data. We will not use your personal information for marketing purposes unless you specifically opt-in for this service or where there is legitimate interest that relates to current or previous engagement with Future Frontiers.

We will never share your personal information with any third parties unless this is necessary for the legitimate purposes of the charity and you explicitly opt-in to allow us to do this.

How we use your personal information - School Contacts, Company Contacts

Where communications are sent to contacts at companies or schools regarding relevant services provided by Future Frontiers, the option for the individual to revoke their consent is clearly available and systems are in place to ensure such revocation is reflected accurately in our systems. The data we collect as part of our direct marketing strategy is processed in accordance with Privacy and Electronic Communications Regulation.

We will take all reasonable precautions to protect and secure your personal information securely regardless of whether it is obtained online or offline. All data about our volunteers and service users, whether sensitive or non-sensitive, is secured with the highest level of physical and electronic processes and will not be kept any longer than is necessary.

How we use your personal information - Supporters

We use information about current and potential supporters to raise funds for Future Frontiers, which are used to support young people to realise their potential. The legal basis for collecting and processing your data is under our legitimate interests as a charity. We may supplement what we know about you with information that is publicly available to contact you, carry out due diligence and/or to send tailored communications. Please note, if you opt out of collection and processing of your data for due diligence, we may not be able to accept donations from you.

Your rights

In some cases, we may hold unidentifiable personal data (for example when working with anonymised data from the National Pupil Database). The rights below relate only to personal information that we are the data controller for and that can be identified as relating to a specific person.

1. Requesting to be informed of what we do with the information we hold about you

If you wish to receive details on how we collect, process, store and analyse any personal data we hold about you, please contact us at info@futurefrontiers.org.uk.

2. Requesting access to, or rectification of, the information we hold about you

If you wish to access or amend any personal data we hold about you, subject to you providing us with relevant proof of identity, please contact us at Future Frontiers, CAN

Mezzanine, 7-14 Great Dover Street, London, SE1 4YR, or email info@futurefrontiers.org.uk.

3. Requesting that we erase the information we hold about you

If you wish for us to remove the information we hold about you, please email us at info@futurefrontiers.org.uk. We will delete your data within one month of receiving your request, subject to the conditions discussed above.

You may also request that we no longer send you marketing information by selecting the “unsubscribe” link at the bottom of our email newsletters or by emailing us at info@futurefrontiers.org.uk.

4. Restricting or objecting to the processing of information we hold about you

If you wish to restrict or object to our processing of any personal data we hold about you, please contact us at info@futurefrontiers.org.uk.

5. Requesting that we transfer information we hold about you

If you wish to request that we transfer any personal data we hold about you to you or another data controller, please contact us at info@futurefrontiers.org.uk explaining the legal basis for the transfer of data.

6. Requesting not to be subject to a decision based on automated processing

If you wish to request not to be the subject of decision making based on automated processing, including profiling, please contact us at info@futurefrontiers.org.uk. However, note that we do not currently carry out any automated decision making based on the personal data we are the data controller for.

About Future Frontiers

Future Frontiers is a registered charity, no. 1162470.

Future Frontiers is a company limited by guarantee, no. 08825219.

Our registered address is Future Frontiers, CAN Mezzanine, 7-14 Great Dover Street, London, SE1 4YR.

How to complain

We hope we can resolve any query or concern you raise about our use of your information.

The General Data Protection Regulation also gives you the right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns/> or telephone: 0303 123 1113.

Changes to this Privacy Notice

This Privacy Notice was published on 11th June 2021 and will be reviewed on 11th June 2022.

We may change this Privacy Notice from time to time. You should check this notice occasionally to ensure you are aware of the most recent version.