



# EMPLOYER HUB ACCEPTABLE USE POLICY JULY 2021

VERSION 1.1 JULY 2021



West Midlands Pension Fund

## PURPOSE

This policy sets out to ensure that WMPF (the Fund) Employer Hub users understand their responsibility for the appropriate use of the Employer Hub (the Hub) and the data contained therein.

## SCOPE

All information that an individual user has access to via Employer Hub is subject to this policy, including, but not limited to: user IDs, user passwords, member data and employer data.

## WHO THIS POLICY APPLIES TO

All employer-based users and third-party payroll providers with legitimate access to the Hub.

## GENERAL PRINCIPLES

*All users will:*

- Be responsible for their own actions and act according to the principles of this policy and wider data protection regulations
- Immediately report any actual or suspected data breach to [WMPFEmployerLiaison2@wolverhampton.gov.uk](mailto:WMPFEmployerLiaison2@wolverhampton.gov.uk)
- Not use data for illicit purposes (including violation of any law or regulation)
- Not disclose confidential or personal information
- Not use corporate information for purposes other than legitimate pension administration
- Abide by the [Terms and Conditions](#) of Employer Hub access
- Access their account at least once a year, otherwise access will be revoked
- Abide by the standards set out in the [Employer Memorandum of Understanding](#)

*Superusers will* (in addition to the above user principles):

- Grant the relevant level of access to users employed by the organisation where access is required in order to perform the required and necessary administration duties in relation to the WMPF
- Inform the Fund as soon as is possible where access is no longer required by a user, either due to a change in role, or where that user is no longer in employment with the organisation
- Regularly review the user information to ensure it is up to date and accurate at all times and notify the Fund immediately where there are inaccuracies
- Assist general processing users with the unlocking of accounts and resetting of passwords

## USER IDs AND PASSWORDS

*All users will:*

- Protect usernames, passwords and security questions/answers appropriately
- Have a unique User ID supplied by the responsible organisation's Superuser
- Be responsible for any actions performed through the use of their User ID
- Change the default password and security question/answer allocated to them when they first access the Hub
- Create a password that is a minimum of six alphanumeric characters in length, which must not contain elements of the User ID
- Change their password regularly (a maximum duration period will be enforced)
- Log out of the Hub when it is not in use
- Not share or disclose their own user credentials, or record them in any way that would allow access to the Hub by unauthorised individuals
- Not use another Hub user's credentials for the purposes of accessing the Hub

## MANAGING AND PROTECTING INFORMATION

*All users will:*

- Understand that they have a legal responsibility to protect personal and sensitive information
- Access Scheme member and employer data for the sole purpose of the provision of member and employer data to the Fund, or to assist members with queries
- Not access the Hub in a public place
- Not attempt to access personal data unless there is a valid need appropriate to their job role
- Not disclose member or employer data unless authorised by the officers that are responsible for that data, in accordance with [data protection legislation](#) and their organisation's policies and procedures.

The City of Wolverhampton Council is a Data Controller under the Data Protection Act 2018. For more information on how the Council manages personal data, please visit <https://www.wmpfonline.com/datamanagement>

The Fund's Privacy Notice sets out how we manage member's data, including who it is shared with and for what purpose it might be used. A copy of our Privacy notice can be found at <https://www.wmpfonline.com/privacynotice>.

A hard copy is available upon request.

## TERMS AND CONDITIONS

By registering for, or logging into, Employer Hub you are agreeing to do so under the terms of the [Computer Misuse Act 1990](#) and prevailing [Data Protection legislation](#). Unauthorised access to online accounts contravenes the Computer Misuse Act 1990 and may incur criminal penalties as well as damages.

These terms and conditions govern your use of Employer Hub and by accessing Employer Hub you agree to be bound by them. If you do not agree to these terms and conditions, you must not use Employer Hub.

We reserve the right to change these terms and conditions at any time, without notice, by updating this Usage Policy, and your continued access to or use of this site will constitute your acceptance of any such changes.

References to "you" or "your" are references to any person accessing Employer Hub "Hub". References to "we", "us" or "our" are references to the West Midlands Pension Fund.

**Personal data:** By registering for Employer Hub you are confirming that you understand your obligations under Data Protection legislation regarding the collection, storing, and processing of personal information that is provided to you by individuals as 'data subjects' of the West Midlands Pension Fund.

To protect any personal information held, the Fund has an obligation to operate in line with the Data Protection Act 2018. The Fund may, if required, pass certain details onto third-party organisations in instances whereby they are carrying out administrative functions of the Fund, for example the Fund's Actuary. The Fund may respond to requests for personal information from other public bodies, e.g. HM Revenues and Customs (HMRC) in connection with their statutory duties.

The Fund's Privacy Notice, sets out how we manage members data, including who it is shared with and for what purpose it might be used. A copy of our Privacy notice can be found at

<https://www.wmpfonline.com/privacynotice>.

A hard copy is available upon request.

We do not guarantee that Hub, or any content on it, will always be available or be uninterrupted. We will not be liable to you if for any reason Hub is unavailable at any time or for any period. We may – in our sole discretion – suspend, withdraw, terminate or change your access to or use of the Hub for any reason, including, without limitation, where we believe that you have not acted in accordance with the Acceptable Use Policy for Employer Hub.

Any information chosen by, or allocated to, you as part of our security procedures must be treated as confidential. You must not disclose it to any third-party.

We have the right to disable your user account at any time if, in our reasonable opinion, you have failed to comply with any of the provisions of these terms and conditions or the Acceptable Use Policy.

If you know, or suspect, that anyone other than you knows your security credentials, you must promptly notify the Fund at

[WMPFEmployerLiaison2@wolverhampton.gov.uk](mailto:WMPFEmployerLiaison2@wolverhampton.gov.uk)

or call us on 0300 111 6516.

Nothing contained on the Hub constitutes financial, investment, legal, tax or other advice and is not to be relied upon in making a financial, investment or other decision. You should obtain relevant and specific professional advice before making any financial or investment decision.

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