

PRIVACY NOTICE FOR VOLUNTEERS

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform you, our volunteers, of the types of data we process about you. We also include within this notice the reasons for processing your data, the lawful basis that permits us to process it, how long we keep your data for and your rights regarding your data.

This notice applies to current and former volunteers.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our volunteers in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each volunteer and we also hold the data within our computer systems.

We hold the following types of data:

- a) Standing data which includes personal contact details.
- b) Historical data which includes your application and references.
- c) Current data which includes details of your declarations around “conflicts of interest” and “Fit and Proper Person Regime,” expenses, hours and location attended, courses attended and DBS checks. There may also be data around any formal or informal HR processes involving you.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the “recruitment” period and subsequently upon the start of your volunteering.

In some cases, we will collect data about you from third parties, such as colleges, former employers or third parties when gathering references or credit reference agencies.

Personal data is kept in secure files within the Company’s Secretariat, HR and IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the volunteer agreement we have with you.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the volunteer agreement that we have entered into with you.	Performance of the contract
Making reasonable adjustments for disabled volunteers	Legal obligation
Carry out all HR & training processes and maintenance of records	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests

E) SPECIAL CATEGORIES OF DATA

Special categories of data include data relating to your:

- a) health
- b) race
- c) ethnic origin
- d) union membership

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a volunteer agreement with you. This could include being unable to offer you an opportunity to volunteer, or administer contractual benefits.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the “recruitment” stage, however, it may also be collected during your time as a volunteer. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of our legitimate interest to process this data.

H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons: compliance with CQC/HMRC/Local Authorities/ HSE requirements, to obtain DBS and qualification documents, to manage HR processes and maintain public liability and other insurance. (Please see our website for further details <http://www.integratepreston.org.uk>)

We do not share your data with bodies outside of the European Economic Area.

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your volunteering with us though in some cases we will keep your data for a period after your volunteering has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below:

Record	Recommended Retention Period
Application forms and interview notes	6 months to a year, 6 years after end of Service for Directors.
Assessments under health and safety regulations and records of consultations with safety representatives and committees.	Permanently
Personnel files, training records, disciplinary records, working time records	6 years after end of volunteering
Working hours (where applicable)	2 years after they are made

K) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) VOLUNTEER RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in our separate policy on Subject Access Requests”;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on your rights under GDPR.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

Our appointed compliance officer in respect of our data protection activities is:

Andy Guthrie, Corporate Services Director.
Tel: 01772 730312 email: andy.g@integratepreston.org.uk

Please note: A current copy of this document will be posted on our website and any minor changes will be reflected in that document.

Mar 2020 amended for hours and location attended