

# Volunteers' Privacy Notice



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## Document Change Log

This document will be reviewed **24 Months** or as changes in legislation dictate.

Version No	Date	Document Change
01	July 2021	New item

## Equality Statement

All customers, employees and members of the public should be treated fairly and with respect, regardless of age, disability, gender, marital status, membership or no membership of a trade union, race, religion, domestic circumstances, sexual orientation, ethnic or national origin, social & employment status, HIV status, or gender re-assignment.

## Introduction

Humankind processes the personal data of volunteers to offer volunteering opportunities.

As an organisation, Humankind must be clear about what it does with personal data; and this must be presented in an honest, transparent, and easy to read way.

Under the Data Protection Act 2018 and UK GDPR, individuals have rights which must be upheld when personal data is processed. This includes a right to know why we need the information, what we are doing with it and who we are sharing it with.

It is good practice to ensure that this information is written down in a document called a Privacy Notice.

This document is Humankind's volunteer privacy notice.

## Guidance to the privacy notice

This privacy notice should be available and accessible to all volunteers and those applying to volunteer for us.

Copies should be freely available and included as part of the recruitment and induction process.

You may use this notice to provide information to potential and existing volunteers who are asking about their data rights and if you have any further questions, please contact your Data Protection Officer at [dpo@humankindcharity.org.uk](mailto:dpo@humankindcharity.org.uk)

## Relevant Documentation

- Data Protection Act 2018
- UK GDPR

## Websites

<http://www.ico.org.uk>

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## Volunteer Privacy Notice

As an employer, Humankind must meet its data protection and UK GDPR obligations. We are committed to ensuring that the personal data of our volunteers is handled in accordance with the principles set out in UK data protection legislation.

This privacy notice tells you what to expect when Humankind collects personal information about you. It applies to all volunteers, ex-volunteers and those applying to volunteer for us.

However, the information we will process about you will vary depending on your specific role and personal circumstances.

Humankind is the Data Controller (we decide the purpose and means of data processing) for this information. You can contact our Data Protection Officer at [DPO@humankindcharity.org.uk](mailto:DPO@humankindcharity.org.uk) to query matters related to data protection.

## Privacy Notice Review Period

This notice was last reviewed July 2021. It will be reviewed again in July 2023 (unless changes to processing require us to update sooner).

## How We Obtain Your Information

We get information about you from the following sources:

- Directly from you.
- From referees, either external or internal.
- From security clearance providers (such as the Disclosure and Barring Service).
- From your prior organisation if the contract is now being delivered by Humankind. Where this is the case, we instruct the organisation you previously volunteered for to obtain your consent before sharing your information with us.
- CCTV images (and in some locations, audio) from our landlords or taken using our own CCTV systems. Please note that this notice does not include privacy information about CCTV processing. Please see the project's CCTV Privacy Notice.
- Publicly available information (e.g. from the News).

## What We Collect and Why

We process the personal data related to your volunteering and we use the following information to carry out the agreement we have with you, provide you access to business services required for your role and to manage our human resources processes:

- Personal contact details such as your name, address, contact telephone numbers (landline and mobile) and personal email addresses.
- Your date of birth, gender and national insurance number.
- A copy of your passport or similar photographic identification and /or proof of address documents.
- Next of kin, emergency contacts and their contact information.
- Employment and education history including your qualifications, job application, employment references, right to work information and details of any criminal convictions that you declare.
- Location of volunteering (e.g., home base or office location)
- Details of any secondary employment, political declarations, conflict of interest declarations or gift declarations.
- Security clearance details including basic checks and higher security clearance details according to your job.
- Any criminal convictions that you declare to us.
- Your responses to surveys if this data is not anonymised.
- Information about your role, including your start and leave dates and any changes to your Volunteer Agreement,
- Details of your hours, expenses or other payments claimed.

- Your bank account details for repayment of expenses.
- Information relating to your performance and training.
- We use this information to assess your performance and to meet the training and development needs required for your role.
- Outcomes of any investigations or complaints about your conduct, in line with our problem-solving process; and investigations to which you may be a party or witness.
- Whistleblowing concerns raised by you, or to which you may be a party or witness.
- Information related to your training history and development needs.
- Information relating to monitoring. We use this information to assess your compliance with corporate policies and procedures and to ensure the security of our premises, IT systems and workforce.
- Information about your access to data held by us for the purposes of criminal enforcement if you are involved with this work.
- Information derived from monitoring IT acceptable use standards.
- Photos and CCTV images.
- We use the following information to comply with our legal obligations and for equal opportunities monitoring. We also use it to ensure the health, safety and wellbeing of our workforce.
- Health and wellbeing information either declared by you or obtained from health checks, including your Covid vaccination status (includes vaccination as well as boosters).
- Accident records if you have an accident at work.
- Details of any desk audits, access needs or reasonable adjustments.
- Information you have provided regarding protected characteristics as defined by the Equality Act and s.75 of the Northern Ireland Act for the purpose of equal opportunities monitoring. This includes racial or ethnic origin, religious beliefs, disability status, and gender identification and may be extended to include other protected characteristics.
- Your Covid Positive/Negative status (please see our Covid Testing Privacy Notice and Policy)
- Your Covid Vaccination Status (please see our Covid 19 Vaccination Status Policy)
- Information you tell us because you want to disclose information you feel is relevant to your volunteering.

## Lawful Basis

We rely on the following lawful basis for collecting, retaining and using your personal data under the GDPR:

- **Article 6(1)(f) Legitimate Interests**, so we can comply with insurance requirements with regard to collecting your personal data for volunteer recruitment, management and training purposes.

For information about the lawful basis for processing data pertaining to your vaccination status please see the Covid 19 Vaccination Status Privacy Notice.

## Special Category Data

Where the information we process is special category data, the additional conditions for processing are:

- **Article 9 (2) (a) Explicit Consent**. Where we collect data about your health, this will usually be because you have wanted to tell us about a health condition or disability that you would like us to add to your files.

For some of our partnership projects such as those we run in Forward Leeds with St Anne's and with Barca, we collect your health information in order to produce a wellbeing plan. We share this information with the third party partner organisation so that you are supported in your role and also so that any risks can be managed. We make you informed that we share this data and we ask for your explicit consent to share it. Please be aware that if you do not consent to this data being shared or you withdraw your consent at a later date, we will not be able to continue your volunteering in that specific project.

- **Article 9 (2) (g) Substantial Public Interest**: When we process equal opportunities information about you such as your ethnicity, religion/beliefs, disability and sexual orientation we anonymise

this data after collection. Prior to your data being anonymised, we rely on Schedule 1 condition 8; Equality of Opportunity or Treatment. This condition is met as the processing is of a specified category of personal data; and is necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment between groups of people specified in relation to that category with a view to enabling such equality to be promoted or maintained.

For information about the special category conditions we rely on for processing data pertaining to your vaccination status please see the Covid 19 Vaccination Status Privacy Notice.

We process information about volunteers' criminal convictions and offences when we carry out a Disclosure and Barring Service (DBS) check. The lawful basis we rely on to process this data is:

- **Article 6 (e) for the performance of our Public Task.** We run a DBS check to reduce the risks to the public (service users) who are children and adults at risk. As per the Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 (See section 73 Duty to Check); Humankind is considered a provider of regulated activities and as such, ensures all members of its workforce, involved in these activities are safe to work with these vulnerable groups and are not barred from working with vulnerable children and/or adults.

## Information Sharing

There are times when we may share your information under the lawful basis of **legal obligation** to third parties without your knowledge or consent, such as:

- to inform the police in order to report or prevent a criminal activity (including acts of terrorism).
- to inform social services if we suspect that a child or adult is at risk of abuse and/or neglect.
- any other request where Humankind is legally obliged to process the personal data to comply with UK law. As an example, under a court order we are **legally obliged** to share your personal information (*Data Protection Act 2018; Schedule 2; part 5*).

If you were in a life-or-death situation, we use the lawful basis **Vital Interests** to provide your personal data to the emergency services so that they may save your life.

We will only share the information that is necessary and proportionate to the purpose.

We use data processors for some of our processing activities (for example, where we arrange that an external training provider delivers training to our volunteers). A list of our current data processors can be found at Appendix A. We hold contracts or written agreements with processors which detail processing arrangements.

We will also share information about you with our training providers. For example, this will include information such as your name, contact details and role. With your consent, we will also share information about any dietary or access requirements that you might have when you attend training events. The main providers we work with are listed in Appendix A. Please note that on occasion, we may use a different provider for a 'one-off' training event and the details of which will not be added to the appendix A. However, you will be aware of the provider when you attend the training and the data sharing process will be the same as we have detailed in this paragraph.

If you provide our details to a third party for a reference for an employment or volunteering opportunity, we may be asked by your new or prospective employers to provide a reference. For example, we may be asked to confirm the dates of your volunteering or your role. If you are still volunteering with us at the time the request for a reference is received, we will obtain your consent before providing this.

We report to universities on the hours our volunteers provide and we also report to Investing in Volunteers on quantitative data. As this data is anonymous, it falls out of scope of the UK GDPR because no personal data is shared.

If you are volunteering at Forward Leeds as part of agreed partnership working with the charities St Anne's or Barca, the lead staff member of those third party projects will be given access to Humankind systems so that they can access your personal data, DBS risks assessment and health wellbeing plan in order to manage any risks and support you in your volunteering role. This data is shared relying on **Article 6(1)(f) Legitimate Interests** relying on the special category condition **Article 9 (2) (a) Explicit Consent**. Please be aware that if you do not consent to this data being shared or you withdraw your consent at a later date, we will not be able to continue your volunteering in that specific project.

## Keeping Your Information Safe

**Human resources/personnel data:** Personal data is held on secure cloud-based system in the UK as well as on shared network drives; with limited and secure access.

**Training data:** Personal data is held on a secure cloud-based system in the UK. Records are maintained on separate networks with limited and secure access.

## How Long We Keep Your Information For

We keep your information in line with our records, retention and protection policy, the key information is in Appendix B.

## Your Rights

Under the Data Protection Act 2018 and GDPR, you have the following rights:

- to be informed about the collection and use of your personal data.
- to access your personal data (known as Subject Access Request)
- to have inaccurate personal data rectified; or completed if it is incomplete.
- to have personal data erased (known as the right to be forgotten)
- to request the restriction or suppression of your personal data
- to data portability, which allows individuals to obtain and reuse their personal data for their own purposes across different services.
- to object to the processing of your personal data in certain circumstances.
- rights in relation to automated decision making and profiling.

Please note that some of these rights only apply in certain circumstances and we may not be able to fulfil every request. Where a request is declined, we will always explain our decision in full.

To request access to your data or to contact us about any of the rights we have listed, you can email [caldicott.guardian@humankindcharity.org.uk](mailto:caldicott.guardian@humankindcharity.org.uk)

## Overseas Transfers of Data

We do not transfer volunteer personal data overseas unless you have moved abroad and are requesting a reference from us. You will be made aware that once we have sent your data from our systems, we cannot guarantee that it is secured before it reaches you. This is therefore, at your own risk. The same applies in principle, to postal requests as we cannot guarantee safe transit of your personal details. You should consider this before making a request.

If you use a Humankind Zoom account as part of your role please be aware that Zoom has servers based in the USA. We have signed a Standard Contractual Clause document with Zoom. According to the General Data Protection Regulation (GDPR), contractual clauses ensure appropriate data protection safeguards can be used as a ground for data transfers from the EU to third countries.

## Automated Decision Making and Profiling

We use some automated decision making and profiling when we sift volunteer applications. We use software that can identify where mandatory fields have not been completed and which check for right to work criteria.

This is the only time we use automated decision making and profiling. Once, the initial sift has been completed by our recruitment system, a human panel is arranged who review all applications and shortlist using a scoring process related to how well the applicant has met the criteria detailed in the role description and personal specification.

## How to Complain

If you are unhappy about an issue relating to your data you can complain to us through the service you attend or if you would feel more comfortable, you can contact the Humankind Caldicott Guardian at:

Caldicott Guardian, Head Office Humankind, Inspiration House, Bowburn North Industrial Estate, Bowburn, County Durham, DH6 5PF

Email: [caldicott.guardian@humankindcharity.org.uk](mailto:caldicott.guardian@humankindcharity.org.uk)

Tel: 01325 731 160

To make a formal complaint about the way we have processed your data you can take this to the UK's independent body set up to uphold information rights:

Information Commissioner's Officer (ICO)

0303 123 1113

<http://www.ico.org.uk>

## Appendix A: Data Processors

<b>Data Processor</b>	<b>Purpose</b>	<b>Privacy Notice Link</b>
GBG	DBS checks	<a href="https://www.gbqplc.com/privacy-policy/">https://www.gbqplc.com/privacy-policy/</a>
Taye Training	Training Provider	<a href="https://tayetraining.org.uk/privacy/">https://tayetraining.org.uk/privacy/</a>
Care-First	Employee Assistance	<a href="https://www.care-first.co.uk/privacy">https://www.care-first.co.uk/privacy</a>



## Appendix B: Retention Periods Relevant to Volunteers

Document or data type	Retention period
Personal Files	6 years after volunteering ceases
Right to Work ID	2 years after volunteering ceases
Applications of Unsuccessful Candidates	6 months from application
Covid Status	1 years after volunteering ceases
Covid Vaccination Status	1 year after volunteering ceases
Learning and Development Records	6 years after volunteering ceases
Whistleblowing Documentation	6 months following the outcome (if a substantiated investigation). If unsubstantiated, personal data is removed immediately.
Records in relation to hours volunteered	3 years
Accident reports and any evidence collected as part of investigation into the accident (ensuing from obligation on an employer to retain records of any reportable accident, reportable diagnosis, death, or injury in connection with work)	3 years from the date of the last entry (or, if the accident involves a child/ young adult, then until that person reaches the age of 21). Where litigation and insurance claims apply retention to extend based on legal guidance.
CCTV	On premises where CCTV is installed, footage is automatically wiped by the system. This varies for each system but is generally wiped every 1 week or up to every 1 month. For details on a specific system, you can email <a href="mailto:caldicott.guardian@humankindcharity.org.uk">caldicott.guardian@humankindcharity.org.uk</a>
Surveys	Survey questions blend both quantitative and qualitative responses and some free text boxes are included. Anonymity is offered and we advise you not to share identifiable information about yourself in these boxes if you wish to remain anonymous. We keep this as long as it is necessary and as described on the survey.
Equal Opportunities Monitoring Information	This is done via the PeopleKind HR database system for our workforce. For new recruits this is captured via the application process and retained for 6 months if they are not successful at interview. For successful candidates, this data is transferred onto the PeopleKind HR database.
ID Badges	Duration of volunteering. This is destroyed as part of the exit procedure.