

Document Name: inHope Volunteer Privacy Notice

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Content:

1.	Introduction	2
2.	Data Controller	2
3.	The kind of Information we hold about you	3
4.	Purpose of processing the data	4
5.	Recipients of personal data	5
6.	Duration of storage of personal data	5
7.	Your rights in relation to your personal data	5
7.1	The right to be forgotten	5
7.2	The right to data portability	6
7.3	The right to withdraw consent	6
7.4	The right to object to processing	6
7.5	The right of subject access	7
7.6	The right to rectification	7
7.7	The right to restrict processing	7
7.8	Rights related to automated decision making and profiling	7
8.	Complaints	8

1. Introduction

We issue this privacy notice in the interests of transparency over how inHope use (“**process**”) the personal data that we collect from applicants to volunteer and volunteers (“**you**”).

Personal data for these purposes means any information relating to an identified or identifiable person.

Some of that data may be classified in law as sensitive. “**Sensitive personal data**” mean personal data consisting of information as to -

- a) the racial or ethnic origin of the individual,
- b) their political opinions,
- c) their religious or philosophical beliefs,
- d) their membership of a trade union,
- e) their physical or mental health or condition,
- f) their sexual life,
- g) the commission or alleged commission by them of any offence,
- h) any proceedings for any offence committed or alleged to have been committed by them, the disposal of such proceedings or the sentence of any court in such proceedings,
- i) genetic data; and
- j) biometric data where processed to uniquely identify a person (for example a photo in an electronic passport)

This policy sits within the overall **Data Protection Policy** of inHope, reference **CCM P046** which is available on request via the Data Protection Officer identified below.

2. Data Controller

For data protection purposes the “**data controller**” means the person or organisation who determines the purposes for which and the manner in which any personal data are processed.

The data controller is inHope, trading as inHope. Contact details are as follows:

Legal Entity:	inHope (trading as inHope(Bristol) Limited)
Registered Address:	32 Stapleton Road, Easton, Bristol, BS5 0QY
Telephone No.:	0117 330 1230
E-mail:	admin@inhope.uk
Charity Registration:	298528
Company Registration:	02214814

The Data Protection Officer for inHope is named below with contact details:

Name: John Dixon
Position: Trustee
Registered Address: 32 Stapleton Road, Easton, Bristol, BS5 0QY
Telephone No.: 0117 330 1230
E-mail: admin@inHope.uk

The charity is registered with the Information Commissioners Office:

Data Protection Registration Number: Z2781967

3. The kind of Information we hold about you

We may collect, store and use (process) the following categories of personal data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants;
- Next of kin and emergency contact information;
- Bank account details;
- Start date, finishing date;
- Location of volunteering;
- Copy of driving licence, vehicle insurance and vehicle tax information;
- Recruitment information (including copies of references and other information included in your application form, and cover letter/e-mail, notes collected during the interview/selection process);
- Volunteering records (including role titles, volunteering history, volunteering hours (shift records), training records, and DBS check information);
- Performance information inclusive of informal review/supervision notes;
- Information about how your volunteering ended;
- CCTV footage (and other information obtained through electronic means such as swipe-card records);
- Information about your use of our information and communications systems;
- Photographs;

We may from time to time also collect, store and use the following sensitive personal data:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health (physical and mental), including any medical condition, health and absence records;

- Information about spent or unspent criminal convictions and offences.

4. Purpose of processing the data

It is necessary for inHope to process personal data of both applicants and volunteers for the following reasons:

- a. We will need the information in order to identify the individual for the purposes of recruitment;
- b. We will need to maintain that information for the general purposes of the ongoing volunteering relationship including performing the volunteer agreement and maintaining the health and safety of individuals on our premises.

Our legal basis for processing personal data of applicants and volunteers is that:

- a. Processing the personal data is necessary for the purpose of performing the volunteer agreement or to take steps to enter into a volunteer agreement;
- b. Processing is necessary to comply with any relevant legal obligation that may apply; and/or
- c. Processing the data is necessary for the purposes of our “**legitimate interests**” as the data controller (except where such interests are overridden by the interests, rights or freedoms of the individual).

Our “legitimate interests” for these purposes are:

- a. The need to process data relating to applicants and volunteers for the purposes of assessing suitability for voluntary positions and then carrying out the volunteer agreement;
- b. The need to gather data for the purposes of safeguarding the health and safety of applicants and volunteers; and
- c. The need to process volunteer data for the purposes of ensuring network and information security.

We may from time to time need to process sensitive personal data, for example medical records or other information relating to the health and wellbeing of an individual.

In that case we will either obtain the explicit consent of the individual to the processing of such data or we may consider the processing of that data as being necessary for carrying out our obligations as an organisation. That will be assessed on a case-by-case basis.

There is no strict statutory requirement for you to provide data to us. If, however, you do not provide at least the data that is necessary for us to assess suitability for volunteering and then to conduct the volunteering relationship, it will not practically be possible for inHope to accept you as a volunteer.

5. Recipients of personal data

All or certain aspects of your personal data may be received by the following categories of people:

- a. Our Volunteer Manager and Volunteering Admin Officer;
- b. Our Finance and Operations staff;
- c. In the case of volunteer applicants, the interviewer(s) and prospective service manager/deputy manager;
- d. Any individual authorised by us to maintain volunteer files;
- e. Our professional advisers; and
- f. Appropriate external regulators and authorities.

We do not envisage that your data would be transferred outside the EEA. If we perceive the need to do that we would discuss that with you and explain the legal basis for the transfer of the data at that stage.

6. Duration of storage of personal data

InHope will keep personal data for no longer than is strictly necessary, having regard to the original purpose for which the data was processed. Our policy is to retain volunteer data for not more than 6 years from the time that someone ceases to be a volunteer.

7. Your rights in relation to your personal data

7.1. The right to be forgotten

You have the right to request that your personal data is deleted if:

- a) It is no longer necessary for us to store that data having regard to the purposes for which it was originally collected; or
- b) In circumstances where we rely solely on your consent to process the data (and have no other legal basis for processing the data), you withdraw your consent to the data being processed; or
- c) You object to the processing of the data for good reasons which are not overridden by another compelling reason for us to retain the data; or
- d) The data was unlawfully processed; or
- e) The data needs to be deleted to comply with a legal obligation.

However, we can refuse to comply with a request to delete your personal data where we process that data:

- a) To exercise the right of freedom of expression and information;
- b) To comply with a legal obligation or the performance of a public interest task or exercise of official authority;
- c) For public health purposes in the public interest;
- d) For archiving purposes in the public interest, scientific research, historical research or statistical purposes; or
- e) The exercise or defence of legal claims.

7.2. The right to data portability

You have the right to receive the personal data which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit those data to another controller without hindrance from the controller to which the personal data have been provided (us) where:

- a) the processing is based on consent or on a contract; and
- b) the processing is carried out by automated means.

Note that this right only applies if the processing is carried out by “automated means” which means it will not apply to most paper-based data.

7.3. The right to withdraw consent

Where we process your personal data in reliance on your consent to that processing, you have the right to withdraw that consent at any time. You may do this in writing to the Volunteer Manager.

7.4. The right to object to processing

Where we process your personal data for the performance of a legal task or in view of our legitimate interests you have the right to object on “grounds relating to your particular situation”. If you wish to object to the processing of your personal data, you should do so in writing to the Volunteer Manager stating the reasons for your objection.

Where you exercise your right to object, we must stop processing the personal data unless:

- We can demonstrate compelling legitimate grounds for the processing, which override your interests, rights and freedoms; or
- The processing is for the establishment, exercise or defence of legal claims.

7.5. The right of subject access

So that you are aware of the personal data we hold on you, you have the right to request access to that data. This is sometimes referred to as making a “subject access request”.

7.6. The right to rectification

If any of the personal data we hold on you is inaccurate or incomplete, you have the right to have any errors rectified.

Where we do not take action in response to a request for rectification you have the right to complain about that to the Information Commissioner’s Office.

7.7. The right to restrict processing

In certain prescribed circumstances, such as where you have contested the accuracy of the personal data we hold on you, you have the right to block or suppress the further processing of your personal data.

7.8. Rights related to automated decision making and profiling

The GDPR defines “profiling” as any form of automated processing intended to evaluate certain personal aspects of an individual, in particular to analyse or predict:

- Performance in a role;
- Economic situation;
- Health;
- Personal preferences;
- Reliability;
- Behaviour;
- Location; or
- Movement.

You have the right not to be subject to a decision when it is based on automated processing; and it produces a legal effect or a similarly significant effect on you.

However, that right does not apply where the decision is necessary for purposes of the performance of an agreement between you and inHope. InHope may use data related to your performance or attendance record to make a decision as to whether to take action related to that performance. We consider that to be necessary for the purposes

of conducting the volunteer agreement. In any event that is unlikely to be an automated decision, in that, action will not normally be taken without an appropriate manager discussing the matter with you first and then deciding whether the data reveals information such that further steps need to be taken. In other words, there will be “human intervention” for the purposes of the GDPR and you will have the chance to express your point of view, have the decision explained to you and an opportunity to challenge it.

8. Complaints

Where you take the view that your personal data are processed in a way that does not comply with the GDPR, you have a specific right to lodge a complaint with the relevant supervisory authority. The supervisory authority will then inform you of the progress and outcome of your complaint. The supervisory authority in the UK is the ICO. The ICO contact details can be found at: <https://ico.org.uk/for-the-public/> .