Last updated: 08/03/2021
Review due: 08/03/2022

Fair Processing Notice - Volunteers and Trustees

Age UK Medway is committed to protecting the privacy and security of your personal information.

This fair processing notice describes how we collect and use personal information about you during and after your volunteering relationship with us, in accordance with the General Data Protection Regulation 2016 ('GDPR') and the UK Data Protection Act 2018 ('DPA') (the DPA and GDPR are together referred to as the 'Data Protection Legislation').

Everything we do with your personal data counts as processing it - including collecting, storing, amending, transferring and deleting it. We are therefore required to comply with the Data Protection Legislation to make sure that your information is properly protected and used appropriately.

This notice should be read in conjunction with the Data Retention Schedule and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

Our responsibilities

For the purposes of Data Protection Law, Age UK Medway is the 'data controller' of the personal data you provide and of the personal information we hold about you.

Age UK Medway is a registered charity (number 06876354) and company limited by guarantee (number 1133023). The registered address is Age UK Medway, The Admiral's Offices, The Historic Dockyard, Chatham, Kent ME4 4TZ and our contact number is 01634 572616.

We have appointed Anna Stansell as Privacy Officer and they will have day to day responsibility for ensuring that we comply with the Data Protection Legislation and for dealing with any requests we receive from individuals exercising their rights under the Data Protection Legislation.

General Data Protection Principles

In collecting and processing your personal information, we will comply with the data protection law in force at the time. This requires that the personal information we hold about you must be:

- be processed fairly, lawfully and transparently;
- be collected and processed only for specified, explicit and legitimate purposes;
- be adequate, relevant and limited to what is necessary for the purposes for which it is processed;
- be accurate and kept up to date - any inaccurate data must be deleted or rectified without delay;
- be kept for no longer than is necessary for the purposes for which it is processed; and

- be processed securely.

The type of information we hold about you

Your personal data includes all the information we hold that identifies you or is about you, which may include the following information:

- Your name and contact details (i.e. address, home and mobile phone numbers, email address, emergency contact details);
- Details of your academic and professional qualifications, experience, employment history (including job titles, salary and working hours);
- Information regarding your criminal record;
- Details of your referees and references obtained about you from previous employers and/or education providers (including details of any conduct, grievance or performance issues, appraisals, time and attendance);
- Your nationality and immigration status and information from related documents, such as your passport, National Insurance number or other identification and immigration information;
- Whether you have a disability;
- Information regarding any existing medical conditions;
- Any other relevant information you provide including your interests, and whether you are related to any of our employee(s) or member(s) of the Board of Directors / Trustees;
- A copy of your driving licence.

How and why is your personal data collected?

We collect personal information about volunteers through the application and recruitment process, directly from candidates. We also collect information from third parties, including from former employees or character references which you have provided along with your consent.

We need your personal data to make sure you have all you need to be able to volunteer for Age UK Medway, to make sure you are safe and secure in your volunteering role and to fulfil our duty of care for volunteers under section 3 of the Health and Safety at Work Act 1974.

As an agency working with vulnerable people, certain volunteer roles are considered exempt from the provisions of the Rehabilitation of Offenders Act 1974 and any convictions must be declared. We will only use information about criminal convictions and offences to determine, without discrimination, your suitability for the volunteering role.

Who will receive your personal data?

We only transfer your personal data to the extent we need to. We will share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so. We

require third parties to respect the security of your data and to treat it in accordance with the law. Recipients of your personal data may include:

- GBG Online Disclosures / Disclosure & Barring Service
- Companies House and the Charity Commission (Trustees only)
- Barclays Bank Plc (Trustees only)
- Suppliers/contractors where trustees are signatories (Trustees only)

We don't transfer your personal data outside of the EEA.

How long will we keep your personal data?

We will retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. We retain your information for this period in case any issues arise or in case you have any queries. Your information will be kept securely at all times.

Following the end of the retention period, your files and personal data we hold about you will be permanently deleted or destroyed. If we are required to obtain your consent to process your personal data, any information we use for this purpose will be kept until you withdraw your consent, unless we are entitled to retain the personal data on the basis of other grounds set out in the Data Protection Legislation.

Details of retention periods for different aspects of your personal information are set out in our Data Retention Schedule.

What are your rights?

You benefit from a number of rights in respect of the personal data we hold about you. We have summarised the rights which may be available to you below, depending on the grounds on which we process your data. More information is available from the Information Commissioner's Office website (https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/). These rights apply for the period in which we process your data.

1. Access to your data

You have the right to ask us to confirm that we process your personal data, as well as having the right to request access to/copies of your personal data. You can also ask us to provide a range of information, although most of that information corresponds to the information set out in this fair processing notice.

We will provide the information free of charge unless your request is manifestly unfounded, excessive or repetitive, in which case we are entitled to charge a reasonable fee. We may also charge you if you request more than one copy of the same information.

We will provide the information you request as soon as possible and in any event within one month of receiving your request. If we need more information to comply with your request, we will let you know.

2. Rectification of your data

If you believe personal data we hold about you is inaccurate or incomplete, you can ask us to rectify that information. We will comply with your request within one month of receiving it unless we don't feel it is appropriate, in which case we will let you know why. We will also let you know if we need more time to comply with your request.

3. Right to be forgotten

In some circumstances, you have the right to ask us to delete personal data we hold about you. This right is available to you:

- Where we no longer need your personal data for the purpose for which we collected it
- Where we have collected your personal data on the grounds of consent and you withdraw that consent
- Where you object to the processing and we don't have any overriding legitimate interests to continue processing the data
- Where we have unlawfully processed your personal data (i.e. we have failed to comply with GDPR); and
- Where the personal data has to be deleted to comply with a legal obligation.

There are certain scenarios in which we are entitled to refuse to comply with a request. If any of those apply, we will let you know.

4. Right to restrict processing

In some circumstances, you are entitled to ask us to suppress processing of your personal data. This means we will stop actively processing your personal data but we don't have to delete it. This right is available to you:

- If you believe the personal data we hold isn't accurate – we will cease processing it until we can verify its accuracy
- If you have objected to us processing the data – we will cease processing it until we have determined whether our legitimate interests override your objection
- If the processing is unlawful; or
- If we no longer need the data but you would like us to keep it because you need it to establish, exercise or defend a legal claim.

5. Data portability

You have the right to ask us to provide your personal data in a structured, commonly used and machine-readable format so that you are able to transmit the personal data to another data controller. This right only applies to personal data you provide to us:

- Where processing is based on your consent or for performance of a contract (i.e. the right does not apply if we process your personal data on the grounds of legitimate interests); and
- Where we carry out the processing by automated means.

We will respond to your request as soon as possible and in any event within one month from the date we receive it. If we need more time, we will let you know.

6. Right to object

You are entitled to object to us processing your personal data:

- If the processing is based on legitimate interests or performance of a task in the public interest or exercise of official authority
- For direct marketing purposes (including profiling); and/or
- For the purposes of scientific or historical research and statistics.

In order to object, you must have grounds for doing so based on your particular situation. We will stop processing your data unless we can demonstrate that there are compelling legitimate grounds which override your interests, rights and freedoms or the processing is for the establishment, exercise or defence of legal claims.

Automated decision making

Automated decision making means making a decision solely by automated means without any human involvement. This would include, for example, an online credit reference check that makes a decision based on information you input without any human involvement. It would also include the use of an automated clocking-in system that automatically issues a warning if a person is late a certain number of times (without any input from HR, for example).

We don't carry out any automated decision making using your personal data.

Your right to complain about our processing

If you think we have processed your personal data unlawfully or that we have not complied with GDPR, you can report your concerns to the supervisory authority in your jurisdiction. The supervisory authority in the UK is the Information Commissioner's Office ("ICO"). You can call the ICO on 0303 123 1113 or get in touch via other means, as set out on the ICO website: https://ico.org.uk/concerns/.

Any questions?

If you have any questions or would like more information about the ways in which we process your data, please contact Anna Stansell, DPO: annastansell@ageukmedway.org.uk.

Age UK Medway