| Services covered by this policy: | General Pre-school Children's Service | The Hamlet at Home Adult Services |
|---|---|--------------------------------------|
| Post holder(s) responsible for this policy: | CEO | |
| Date approved: | October 2023 | |
| Approved by: | Ellie Coulson- CEO | |
| Signed: | EL Culson | |
| To be reviewed: | October 2025 | |

Privacy Notice: Volunteers

This Privacy Notice tells you how we will use and store the information you give us when you apply to volunteer or are a volunteer at The Hamlet.

The Hamlet collects and processes personal data relating to its volunteers to manage the working relationship. The Hamlet is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does The Hamlet collect?

The Hamlet collects and processes a range of information about volunteers. This includes:

- Their name, address and contact details, including email address and telephone number.
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, and religion or belief.
- Details of their skills, hobbies and interests.
- Any previous experience, either paid or voluntary
- Information about their criminal record.
- Details of their schedule (days of volunteering and volunteering hours)
- Information about medical or health conditions, including whether they have a disability for which The Hamlet needs to make reasonable adjustments.
- Emergency contact information
- Bank details
- Your image (photography and/or filming)

The Hamlet may collect this information in a variety of ways. For example, data might be collected through expression of interest forms; obtained from the employee's passport or other identity documents such as driving license; from forms completed by them at the start of or during volunteering; from correspondence with them; or through meetings or other assessments.

In some cases, The Hamlet may collect personal data about volunteers or from third parties, such as references supplied by current or former employers, places you have volunteered or a teacher/tutor/social worker, and information from criminal records checks permitted by law.

Data will be stored in a range of different places, including in the volunteer's personnel file, in The Hamlet's HR management systems and in other IT systems (including The Hamlet's email system).

At some sites the Hamlet has additional security in the form of CCTV. This will only record activity directly external to the building, with no audio, and there will be clear signage.

Why does The Hamlet process personal data?

The Hamlet needs to process data in order to enter into a volunteering agreement and to meet its obligations to the volunteer. For example, it needs to process the volunteer's data to contact them in the event of an emergency, or arrange any training required.

In some cases, The Hamlet needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a volunteers entitlement to work in the UK, to comply with health and safety laws and for some roles it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, The Hamlet has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing volunteer data allows The Hamlet to:

- Run recruitment and promotion processes.
- Maintain accurate and up-to-date contact details (including details of who to contact in the event of an emergency)
- Maintain and promote equality, diversity and inclusion in the workplace.
- Pay expenses or reimburse costs
- Ensure effective administration
- Assess suitability for the role and match with volunteering opportunities
- Obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities and meet its obligations under health and safety law
- Ensure effective general HR and business administration.
- Conduct volunteer engagement surveys
- Provide references on request for current or former volunteers; and
- Respond to and defend against legal claims.

Some special categories of personal data (also called 'sensitive personal data'), such as information about health or medical conditions, is processed for health and safety purposes (such as those in relation to volunteers with disabilities).

| Name of policy: | Privacy Notice (Volunteers) |
|-----------------|-----------------------------|
| Date approved: | October 2023 |

Where The Hamlet processes other special categories of personal data, such as information about ethnic origin, sexual orientation or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that The Hamlet uses for these purposes is anonymised or is collected with the express consent of volunteers, which can be withdrawn at any time. Volunteers are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Who has access to data?

Volunteer information may be shared internally, including with members of the HR and recruitment team (including payroll), their line manager, managers in the service / business area in which they work and IT staff if access to the data is necessary for performance of their roles.

The Hamlet shares volunteer data with third parties in order to obtain pre-volunteering references and obtain necessary criminal records checks from the Disclosure and Barring Service. The Hamlet may also share volunteer data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

The Hamlet will not transfer volunteer data to countries outside the European Economic Area.

How does The Hamlet protect data?

The Hamlet takes the security of data seriously. The Hamlet has internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused, or disclosed, and is not accessed except by its employees in the performance of their duties.

More information can be found in the staff handbook and policies available on the staff portal on The Hamlet's website. Access to HR systems is restricted to Senior Managers and the Chief Executive and HR Administrator.

Where The Hamlet engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does The Hamlet keep data?

| Name of policy: | Privacy Notice (Volunteers) |
|-----------------|-----------------------------|
| Date approved: | October 2023 |

The Hamlet will hold employee personal data for the duration of their employment. The periods for which data is held after the end of volunteering are set out in our Data Retention Policy.

Rights

As a data subject, volunteers have a number of rights. They can:

- Access and obtain a copy of their data on request.
- Require The Hamlet to change incorrect or incomplete data.
- Require The Hamlet to delete or stop processing their data, for example where the data is no longer necessary for the purposes of processing; and
- Object to the processing of their data where The Hamlet is relying on its legitimate interests as the legal ground for processing.

If a volunteer would like to exercise any of these rights, please contact admin@thehamletcharity.org.uk or phone 01603 215193 and ask to speak to the HR Administrator.

If a volunteers believes that The Hamlet has not complied with their data protection rights, they can complain to the Information Commissioner.

What if you do not provide personal data?

Certain information, such as contact details, a volunteer's right to work in the UK, have to be provided to enable The Hamlet to enter a volunteering agreement with them. If they do not provide other information, this will hinder The Hamlet's ability to administer the rights and obligations arising as a result of the volunteering relationship efficiently.

Automated decision-making

Volunteering decisions are not based solely on automated decision-making.

| Name of policy: | Privacy Notice (Volunteers) |
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