



Action Homeless (Leicester) Ltd (“Action Homeless”)

PRIVACY NOTICE FOR VOLUNTEERS AND THOSE APPLYING FOR VOLUNTARY WORK

What is the purpose of this document?

Action Homeless is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you. It provides you with certain information that must be provided under the **General Data Protection Regulation (GDPR)**.

You are being sent a copy of this privacy notice because you are either a volunteer carrying out voluntary work for us or you are applying to be a volunteer.

Action Homeless is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

The kind of information we hold about you



Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

We will collect, store, and use the following categories of personal information about you:

- The information you or a recruitment agent have provided to us in your curriculum vitae and any covering letter.
- The information you have provided on any application form, including name, title, address, telephone number, and personal email address, date of birth, gender, employment and/or voluntary work history, and referee details.
- Any information you provide to us during any interview.
- Personal contact details such as name, title, address, telephone number and personal email address;
- Date of birth
- Gender
- Next of kin and emergency contact information
- Start date
- Location of voluntary work you may be carrying out for us
- Disciplinary and grievance information
- Information regarding your compliance with our policies and procedures.
- Bank details for the purpose of expenses payment

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.



How is your personal information collected?

We collect personal information about volunteers and those applying for voluntary work through the application and recruitment process, either directly from candidates or sometimes from an employment agency/recruitment provider.

We will also collect personal information from you during the period that you carry out voluntary work for us.

We may also retain personal information regarding you when your period of voluntary work with us ceases.

How we will use information about you

We will only use your personal information we collect about you to:

- Assess your skills, and suitability for voluntary work;
- Carry out background checks, where appropriate;
- Communicate with you about the volunteer recruitment process;
- Keep records related to our volunteer recruitment processes;
- Comply with legal or regulatory requirements.
- Making a decision about your appointment as a volunteer.
- Checking you are legally entitled to work in the UK.
- Complying with our duties towards you as a volunteer (including any duty of care)
- Paying reasonable out of pocket expenses
- Making decisions to ensure you comply with internal policies and procedures.
- Making decisions in connection with any grievance or disciplinary matter involving you
- Making decisions to terminate any voluntary position

As a charity, it is in our legitimate interest to appoint you as a volunteer as it helps us to carry out our services. It is also in our legitimate interests to monitor your performance and to manage you whilst undertaking voluntary work for us.

We may also need your personal information to perform the voluntary work contract we have entered into with you.



We may use your personal information to comply with our legal obligations (including complying with our duty of care to you, our employees and our customers).

In emergency situations, we may use your personal information to protect your vital interests.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application for voluntary work, we may not be able to process your application successfully. This may mean that we are unable to take your application further.

How we use particularly sensitive personal information

“Special categories” of particularly sensitive personal information require higher levels of protection. This information includes the following information: racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic/biometric data, health, sex life or sexual orientation.

We will use special categories of personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments, either to our premises or to enable you to undertake the voluntary work we provide to you;
- Details of health to ensure we comply with our health and safety duties and duty of care towards you when carrying out voluntary work for us;
- We will use information about your racial or ethnic origin, religious or philosophical beliefs, or your sex life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Whenever we use special categories of personal information, we will do so relying on one or more of the following (in addition to our legitimate interests):

- When we have obtained your explicit consent;
- To comply with employment laws, social security laws or social protection laws;
- When you have made the information public;



- To check your working capacity to undertake voluntary work;
- When in the public interest.
- To defend or pursue legal claims.

Information about criminal convictions

We may have to collect information about criminal convictions, if relevant and if legally required taking into the account the nature of the role you have applied for and the customers we provide a service to who are vulnerable and have complex and varied needs.

We will ensure that we have in place appropriate safeguards when processing this type of information, and will seek to do so in accordance with our data protection policy.

We usually use the Disclosure and Barring Service to make checks about criminal records relevant to the work we do and as required by law. In this respect, we are required to carry out such checks in accordance with Part 1, Schedule 1 of the Rehabilitation of Offenders Act (Exceptions) Order 1975.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

What about other third parties?

We may share some of your personal information (where relevant) with other third parties such as funders or grant providers or for regulatory requirements and for DBS checking. We may also need to share your personal information to otherwise comply with the law.

When we do share your personal information with a third party we ensure that they keep such information securely and confidentially and that they only use such information for the purposes for which we have sent it.

Data security



We have put in place measures to protect the security of your information. Details of these measures are available upon request.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

How long will you use my information for?

If we do not recruit you for voluntary work but have obtained personal information from you for the purposes of a recruitment process, we will retain your personal information for a period of 6 months after we have communicated our decision. We retain this information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way or if any voluntary work becomes available during the immediate foreseeable future. After this, unless you ask us to hold your personal data for longer we will securely destroy your personal information in accordance with our data protection policy and any policies on retention of personal information.

If we do recruit you as a volunteer we will retain the personal information for the period of your voluntary work and afterwards for a period of seven years. The reason for this is to take into account the limitation period for the bringing of any claims against us where your personal information may be relevant to such proceedings. We may hold on to such personal information for a longer period if required by our regulators or otherwise required by law.

Your individual rights



Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Tammy Bolton, HR Manager in writing.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another



appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where we have relied on your consent for the collection, processing and transfer of your personal information for a specific purpose (which will be rare), you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact Tammy Bolton, HR Manager. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Person responsible for managing data at Action Homeless

We have appointed Reg Mawdsley, Finance Director to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact Reg Mawdsley. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact Reg Mawdsley or Tammy Bolton.