**PRIVACY NOTICE FOR VOLUNTEERS**

1. **What is the purpose of this document?**

P3 is committed to protecting the privacy and security of your personal information.

This privacy notice describes how P3 collects and uses personal information about you during and after your volunteering relationship with P3, in accordance with the General Data Protection Regulation (GDPR).

P3 is a Data Controller. This means that P3 are responsible for deciding how we hold and use personal information about you.

This notice applies to current and former volunteers. This notice does not form any part of any volunteer agreement. P3 may update this notice at any time.

It is important that you read this notice, together with any other privacy notices P3 may provide on specific occasions when we are collecting or processing personal information about you (so that you are aware of how and why P3 are using such information).

1. **Data Protection Principles**

P3 will comply with data protection law which says that the personal information P3 holds about you must be:

* Used lawfully, fairly and in a transparent way.
* Collected only for valid purposes that P3 have clearly explained to you and not used in any way that is incompatible with those purposes.
* Relevant to the purposes that P3 have told you about and limited only to those purposes.
* Accurate and kept up to date.
* Kept only as long as necessary for the purposes which P3 have told you about.
* Kept securely.

1. **The type of information which P3 holds 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 (known as anonymous data).

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

P3 will collect, store and use the following categories of personal information about you:

* Your name and title.
* Address.
* Telephone number.
* Personal e-mail address.
* Date of birth.
* Gender.
* Marital status and dependents.
* Next of kin and emergency contact information.
* Bank account details for expenses
* Location of volunteer role
* Copy of driving licence for expense and insurance purposes in certain roles
* Recruitment information including copies of right to work documentation, references and other information including a CV or cover letter submitted as part of the application process.
* How many hours you volunteer each week
* Training records and details of your qualifications, skills and experience
* Supervision notes
* CCTV footage
* Information about your use of P3 information and communications systems.
* Photographs.
* Details of your volunteering schedule
* Details of periods of any breaks from volunteering and communication relating to breaks and intentions to return to volunteer
* Assessments of your development, including your volunteer development review, the training you have participated in, and related correspondence.

P3 may also collect, store and use the following ‘special categories’ of more sensitive information:

* Information about your race or ethnicity, religious beliefs, political opinions and sexual orientation.
* Information about medical or health conditions, including whether or not you have a disability for which P3 needs to make a reasonable adjustment.
* Information about criminal convictions and offences.

Your data will then be stored in a range of different places, including your personal file, within HR management systems and on other IT systems (including e-mail).

1. **How is your personal information collected?**

P3 collect personal information about volunteers through the application and recruitment process, either directly from you, from a Council for Voluntary Services or a background check provider. P3 may sometimes collect additional information from third parties including former employees or other background check agencies including criminal records checks permitted by law.

P3 will also collect additional personal information in the course of volunteer related activities throughout your period of volunteering with P3.

1. **How will P3 use information about you?**

P3 will only use your personal information when the law allows us to do so. Most commonly, we will use your personal information in the following circumstances:

* Where P3 need to perform the agreement we have entered into with you.
* Where P3 need to comply with a legal obligation.
* Where it is necessary for our legitimate interests (or those of a third party), and your interests and fundamental rights do not override those interests.

P3 may also use your personal information in the following situations (which may be rare):

* Where P3 need to protect your interests (or someone else’s interests).
* Where it is needed in the public interest (or for official purposes).

1. **Situations in which P3 will use your personal information**

P3 needs to process your data to ensure that you are supported in your volunteer role, we may need to pay you expenses, contact your relatives or friends who are your emergency contacts and send you information by post to your home address and by email to your personal email address.

In some cases, an organisation needs to process data to ensure that it is complying with their legal obligations. For example, P3 are required to check your entitlement to volunteer in the UK (if you are in the UK temporarily) and comply with health and safety laws. For certain roles, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

P3 needs all the categories of information in the list provided at Section 3, primarily to allow P3 to support you in your volunteering role.

In some cases, P3 may use your personal information to pursue legitimate interests of our own or those of third parties, provided your interests and fundamental rights do not override those interests.

The situations in which P3 will process your personal information are listed below:

* Making a decision about your suitability for a volunteering role
* Determining your availability and how this fits with the needs of the service
* Checking you are legally entitled to volunteer in the UK.
* Paying your expenses for your commute to and from your base
* Business management and planning, including accounting and auditing.
* Conducting volunteer development reviews.
* Education, training and developmental requirements.
* Ascertaining your fitness to volunteer
* Complying with health and safety regulations.
* To prevent fraud.
* To monitor your use of our information and communication systems to ensure compliance with P3 IT policies.
* To ensure network and information security (including preventing unauthorised access to P3 computer and electronic communications systems and preventing malicious software distribution).
* To conduct data analytics studies to review and better understand volunteer retention and attrition rates.
* Equal Opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

1. **If you fail to provide personal information**

If you fail to provide certain information when requested, P3 may not be able offer you a volunteering role as we may be prevented from complying with our legal obligations (such as ensuring your health and safety and the health and safety of our workers).

1. **Change of purpose**

P3 will only use your personal information for the purposes for which it was collected (unless P3 reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose). If P3 need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that P3 may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

1. **How P3 use particularly sensitive personal information**

‘Special Categories’ of particularly sensitive personal information require higher levels of protection. P3 need to have further justification for collecting, storing and using this type of personal information. P3 may process special categories of information in the following circumstances:

* In limited circumstances, with your explicit written consent.
* Where P3 need to carry out our legal obligations and in line with our data protection policy.
* Where it is needed to assess your volunteering capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, P3 may process this type of information where it is needed in relation to a legal claim or where it is needed to protect your interests (or someone else’s interests) and you are not capable of giving your consent or where you have already made the information public.

1. **Our obligations to you as a Volunteer**

P3 will use information about your physical or mental health or disability status, to ensure your health and safety in your role and to assess your fitness to volunteer and to provide appropriate reasonable adjustments.

1. **Do we need your consent?**

In limited circumstances, P3 may approach you for written consent to allow us to process certain particularly sensitive data. If we do so, P3 will provide you with the full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent. This will be your decision and will not affect your volunteering role with P3.

1. **Information about criminal convictions**

P3 may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with the P3 GDPR policy.

P3 do not hold information about criminal convictions. P3 will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. Where appropriate, P3 will collect information about criminal convictions as part of the recruitment process or P3 may be notified of such information directly by you in the course of working for us.

P3 will use information about criminal convictions and offences in the following ways:

* Making a decision about your recruitment or ongoing volunteering role.
* Checking that you are legally entitled to carry out your role (i.e. you are not barred from working with either children or vulnerable adults, dependent on your role).

P3 are allowed to use your personal information in this way to carry out our lawful obligations.

1. **Automated Decision Making**

P3 do not envisage that any decisions will be taken about you using automated means, but we will notify you in writing if this position changes. Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention.

**14 Data Sharing**

P3 may have to share your data with third parties, including third party service providers and other entities within the group. P3 require third parties to respect the security of your data and to treat it in accordance with the law.

P3 may transfer your information outside of the European Economic Area. If we do, you can expect a similar degree of protection regarding your personal information.

1. **Why might you share my personal information with third parties?**

P3 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.

1. **Which third party service providers process my personal information?**

‘Third Parties’ include third party service providers (including contractors and designated agents) and other entities within our group. The following services are carried out by third party service providers:

* IT services
* DBS service provider

1. **How secure is my information with third party service providers and other entities in our group?**

All of our third party service providers and other entities in the group are required to take appropriate security measures to protect your personal information in line with our policies. P3 do not allow our third party service providers to use your personal data for their own purposes. P3 only permit them to process your personal data for specified purposes and in accordance with our instructions. Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and keep it secure.

1. **Data Security**

P3 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, P3 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. Details of these measures can be obtained from the Data Protection Officer at P3 Head Office.

P3 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 P3 are legally required to do so.

**Data Retention**

1. **How long will you use my information for?**

P3 will only retain your personal information for as long as necessary to fulfil the purposes it was collected it for, including for the purposes of satisfying reporting requirements. Details of retention periods for different aspects of your personal information are available in the P3 Confidentiality and Information Handling Policy which is published on the P3 desktop.

To determine the appropriate retention period for personal data, P3 consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purpose for which we process your personal data and whether P3 can achieve those purposes through other means and the applicable legal requirements.

**Rights to access, correct, erase and restrict your personal information**

1. **Your duty to inform us of changes**

It is important that the personal information P3 hold about you is accurate and current. Please keep P3 informed if your personal information changes during your volunteering relationship with us.

1. **Your rights in connection with personal information**

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

* **Request access** to your personal information (commonly know as a ‘data subject access request’). This enables you to receive a copy of the personal information P3 hold about you and to check that we are lawfully processing it.
* **Request correction** of the personal information that P3 holds about you. This enables you to have any incomplete or inaccurate information P3 hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask P3 to delete or remove personal information where there is no good reason for P3 continuing to process it.

You also have the right to ask P3 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 P3 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.
* **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 information to another party.

If you want to review, verify, correct, request or erase any of your personal information, object to the processing of your personal data or request that P3 transfer a copy of your information to another party, please contact the P3 Human Resources Department in writing.

1. **No fee required**

You will not have to pay a fee to access your personal information (or to exercise any of the other rights)

1. **What we may need from you**

P3 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.

1. **Right to Withdraw Consent**

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing time.

To withdraw your consent, please contact the P3 Human Resources Department. Once P3 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 P3 have another legitimate basis for doing so in law).

1. **Data Protection Officer**

P3 have appointed a Data Protection Officer to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how P3 handle your personal information, please contact:

Andy McKinney

The Data Protection Officer

Eagle House

Cotmanhay Road

Ilkeston

Derbyshire

DE7 8HU

Telephone number: (0115) 850 8190

If you believe that P3 have not complied with the requirements of the General Data Protection Regulation, 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, who can be contacted on telephone number 0303 123 1113.

1. **Changes to this privacy notice**

P3 will keep this privacy notice under regular review and reserve the right to update the notice at any time and will provide you with a new privacy notice when we make any substantial updates. P3 may also notify you in other ways from time to time about the processing of your personal information.