

Data Protection for Volunteers

All volunteers must complete the below sign off.

This document is for all volunteers to provide a refresh and update on the policy and how it applies to your role as a volunteer. This document is not a replacement for completing any Data Protection e-learning assigned to you; please ensure you do complete this.

Who /What does the Data Protection Policy apply to?

It applies to all staff, members, guests, volunteers, sessional tutors and contractors and relates to the use of any Crisis owned facilities, any private systems when connected to the Crisis network, Crisis owned or licensed data and programmes.

As a volunteer this means its related to any information you store or access on a Crisis system or device (email, MAPS, SharePoint, Raisers Edge, Crisis provided device etc) and to any information you access relating to your volunteer role at Crisis on a personal device. It also relates to any paper/written records you make in relation to Crisis business.

Types of data

Personal data – any information relating to a living individual (or identifiable natural person), who can be identified (directly or indirectly) in particular by reference to an identifier such as a name, an identification number (e.g., your NI number), geo-location data, an online identifier (e.g., IP address), or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special category data – This is particularly sensitive data, which includes information about:

- The racial or ethnic origin of data subjects
- Their political opinions
- Their religious beliefs or other beliefs of a similar nature
- Whether they are members of a trade union
- Their physical or mental health or condition (including information on preventative medicine, medical diagnosis, medical research and the provision of care and treatment)
 - a) Their sexual life or sexual orientation
 - b) Genetic or biometric data for the purpose of identifying a natural person

Whilst not defined as special category data, Crisis also treats the following information with similar care:

- c) Personal and email addresses
- d) Financial data (including salaries)
- e) Information on alleged or spent criminal convictions

We should only process information that we need to be able to deliver the service.

Your role in processing Crisis data

As a volunteer you are possibly going to be processing Crisis controlled data – this means you should handle information that is personal or sensitive in line with data protection principles and the processes you are advised of in your induction into your role. If you are in doubt about how to handle any data, you should speak to the Data Protection Compliance Officer.

You should also ensure that if as a volunteer you receive a request for a Subject Access Request this is passed to your Team Leader on shift so that they can share it with our Data Protection Compliance Officer (data.protection@crisis.org.uk). Any data breaches should also be reported to the Team Leader so that they can ensure they are reported promptly to the Data Protection Compliance Officer or a member of Crisis at Christmas staff who can report it via the IT Portal. The Team Leader should be speaking to the Christmas Volunteer Manager or Data Protection Compliance Officer promptly so that they can initiate the appropriate processes.

What is a Subject Access Request (SAR)?

Those who we hold data on (Data Subjects) have the right to request access to the personal data we hold on them – these requests can be made in any area of work we do and they don't need to be made in writing. Crisis has one calendar month to provide information requested from the date that a request is made (regardless of where it is made to) so it is important that there is no delay in notifying the DP team.

What to do if someone wants to make a SAR?

Whilst we don't expect volunteers to receive a request for a SAR very often, it is important that Crisis responds to the request appropriately and that you are aware of what to do. As a volunteer you must speak to your Team Leader/Volunteer Manager as soon as possible. Anyone can make a SAR if we hold data on them (e.g., a guest, a supporter, a shop customer) and we must respond as soon as possible and within one calendar month. Please make sure you have the full name and contact details of the individual making the request and explain that their request will be passed to our Data Protection Compliance Officer. Please note that the clock starts ticking for us to respond from the date the data subject makes their request and so you passing the request promptly is essential.

What to do if a data breach occurs?

As a volunteer if a data breach occurs it is really important it is reported as soon as is possible. You should speak to the Data Protection Compliance Officer immediately if you think a breach or potential breach has occurred so they can raise a data breach alert on our IT service portal. Our Data Protection Compliance Officer will then assess if a breach has taken place and where appropriate report to the ICO (Information Commissioner's Officer). Examples of data breaches include:

- Sharing confidential information with a third party without consent
- Holding information on paper and losing the paperwork/someone seeing it who shouldn't
- Sending an email to the wrong person with personal or sensitive data included

- Using a personal/Crisis device with guest/supporter details stored on it and losing it/it being stolen/someone else gaining access to it

We understand that sometimes mistakes/errors of judgement happen, and in these situations will always aim to have a conversation with you about what has happened. However, if data is breached through negligence or deliberately, or you fail to report a breach this may affect your volunteering.

What else should I think about as a volunteer?

- Always follow the processes you are given when inducted into your role. If you are not sure always ask someone. This includes the processes regarding storage of information and deletion of information, for example if you have a guest number and are no longer supporting them
- If you are using a personal device to access Crisis networks, please always ensure your anti-virus and security is up to date
- If you are using a shared personal device, please ensure you have a separate log-on and don't share the password for this
- If you receive a phishing email either on a Crisis device or to your Crisis email account, or you click on a link (on either of these) that is a phishing email please report it immediately to IT.
- Please do not store personal and sensitive data on USB sticks, personal hard drives or personal devices. If you have a Crisis Christmas email address you will have access to Teams where you can store information. If you don't, please do not store information on personal devices in any way
- Please ensure you complete your Data Protection e-learning module(s)
- Thank you for working with us to ensure we keep data safe and secure and protect the interests of those we engage with in our work and services

Volunteer Privacy Statement

How your information will be used

1. When you volunteer for us, Crisis needs to keep and process information about you. The information we hold and process will be used for our management, administrative and promotional use where Crisis is seeking to attract new volunteers to work in our shops. We may also use your details to send you marketing information where you have agreed to receive marketing from us
2. We will keep and use it to enable us to run our charitable business and manage our relationship with you effectively, lawfully and appropriately, during:

- a. the recruitment process
 - b. whilst you are volunteering for us
 - c. at the time when your volunteering ends
 - d. after you have left
3. This includes using information to enable us to comply with our agreement with you, to comply with any legal requirements, pursue the legitimate interests of Crisis and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision

The lawful basis that enables us to process your information

4. We process your information to enable you to volunteer at Crisis at Christmas and support our relationship with you. The most obvious example is recording of your contact details in order to notify you of your volunteer shifts and of any information relating to your volunteer experience
5. Where processing is necessary in order to comply with a legal obligation: for example, complying with health and safety law in certain circumstances
6. Where the processing is necessary for our 'legitimate interests': this ground enables us to process your personal data where we have legitimate interest (more than simply an economic interest) which is not outweighed by your right to privacy and such processing is necessary in pursuing that interest. For example, to prevent fraud, administrative purposes, to reach individuals on social media who may have similar interests to you and be interested in volunteering for Crisis, or reporting potential crimes. We will never process your data where these interests are overridden by your own interests
7. With your consent where you share more sensitive information with us in support of our monitoring of diversity of our Christmas supporters

Where do we get your information from?

8. All of the information we hold will have been provided by you. The sort of information we hold includes:
 - a. Your online application form with your personal details
 - b. A volunteer agreement if you are a Senior Volunteer
 - c. Correspondence with or about you, for example emails to Team Leaders that may mention your name
 - d. Contact and emergency contact details
 - e. Records of absence
 - f. Information needed for equal opportunities monitoring policy including protected characteristic information
 - g. Records relating to your volunteering history with us, such as training records
9. Where necessary, we may keep information relating to any support needs you have notified us of. This information will be used to comply with our health and safety obligations – to consider how your health affects your ability to volunteer with us and whether any adjustments to your role might be appropriate
10. We may process special categories of information relating to any disclosed, disability, gender, ethnicity, religious belief, and sexual orientation of the purposes identified in section 8(f) above
11. Where we are processing data based on your consent, you have the right to withdraw that consent at any time

Sharing and keeping your personal information

12. When you volunteer with us at Christmas, Crisis want to give you a smooth and seamless experience in joining the thousands of people who share this experience. To do this we work with a number of partner organisations - their details and how we work with them are list below:
 - a. 'My Crisis Volunteering' is our platform that enables to register to volunteer with us
 - b. if a volunteering role requires an individual to be vetted or DBS checked, we use a supplier called UCheck
 - c. to effectively manage shift allocations we use a platform called Rosterfy
 - d. We may send you text reminders about your shifts using Twilio
13. Your personal data will be stored for a period of four years from when you last completed a volunteer application online. If you did not complete an application, we will delete your data after 2 years from you last logged in to the online system.
14. If you abandon your registration part way though the on-line registration process, we will retain this information to contact you about completing it or about registering for another year. We will not use your information for marketing purposes unless you have agreed to it within the registration process.
15. If you volunteer for us in our retail shops, we may share your contact details with Facebook (META) in order to reach out to people who may have similar interests to you and be interested in volunteering for us. This is called finding 'lookalikes' – more details about Facebook lookalike audiences is [here](#) If you do not agree to your information being used in this way please advise us of your objection by contacting volunteering@crisis.org.uk

Your rights

16. Under the UK General Data Protection Regulation (UK GDPR) and The Data Protection Act 2018 (DPA) you have a number of rights with regard to your personal data. You have the right to:
 - a. Request access to, rectification of or erasure of your personal data
 - b. The right to restrict processing
 - c. Object to processing in certain circumstances where the processing carried out on the grounds of legitimate interest and
 - d. the right to data portability in certain circumstances
17. If you have provided consent for the processing of your data you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn
18. You have the right to lodge a complaint to the Information Commissioners' Office if you believe that we have not complied with the requirements of the UK GDPR or DPA 2018 about your personal data. They can be contacted via their website

<https://ico.org.uk/concerns/handling/>, but we would prefer that you discuss concerns with either your line manager, our HR team or Crisis' own data protection compliance officer before escalation to the regulatory body

Identity and contact details of controller and Data Protection Compliance Officer

19. Crisis is a data controller for the purposes of the DPA 2018 and UK GDPR
20. If you have any concerns as to how your data is processed, you can contact our Data Protection Compliance Officer at data.protection@crisis.org.uk.