

# **Our Privacy Notice**

As an NSPCC volunteer you'll be committed to keeping children safe. And as an organisation we're also committed to keeping your personal information safe too. We have robust processes in place to safeguard the privacy and security of information concerning all our volunteers, – prospective, current and former.

This notice covers all volunteers who are supporting us in our fight for every childhood. And by accepting the terms of your volunteership and/or applying to volunteer for the NSPCC, you acknowledge that the NSPCC will process personal and sensitive data (as defined in Data Protection Laws) relating to you for legal, administrative and management purposes.

The National Society for the Prevention of Cruelty to Children (NSPCC) is registered with the Information Commissioner's Office, registration number Z7100391. In this Privacy Notice, references to "NSPCC" "we" and "us" mean the NSPCC, and references to "Data Protection Laws" are to the EU Data Protection Directive 95/46/EC (as will be superseded by the EU General Data Protection Regulation (2016/679)), the Data Protection Act 1998, the EU Privacy and Electronic Communications Directive 2002/58/EC, and any amending or replacement legislation from time to time.

Here's how we keep your information safe:

## **Securing information**

We are committed to keeping your personal information secure. We have put in place physical, electronic and operational procedures intended to safeguard and secure the information we collect. All NSPCC staff and volunteers have a legal duty to respect the confidentiality of information, and access to confidential information is restricted to only those who have a reasonable need to access it.

# **Using your information**

We use your information to manage all aspects of your volunteering. That includes, recruitment, training, developing and managing the services we deliver using volunteers including your individual contribution to those services, and for personalising your experience on The Volunteer Hub and in our communications with you. The information we collect is essential so we have a full overview of your relationship with us; failure to provide mandatory information may mean we can't let you volunteer.

## Our lawful basis for processing your data

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Data Protection law requires us to have a reason or justification, also known as a 'lawful basis', for using any of your personal data:

### Consent

This is where we've asked for your permission to use your personal data in a specific way, and you've agreed. For example to send you marketing via email or SMS.

## Contract

We may process your personal data as part of an agreement you have with us.

### Legal obligation

We may collect or share your personal data where we are required to do so by law. For example to fulfil a regulatory requirement or for fraud detection.

#### Vital Interests

Where there's an immediate risk to your health we may use your personal data. For example if we're concerned for your health or safety at one of our fundraising events.

#### Public task

Some activities are undertaken in the public interest. For example collecting personal data in relation to safeguarding concerns raised via the NSPCC Helpline.

#### Legitimate interests

Our legitimate interest is in engaging with the public to further our charitable aims.

Whenever we use this justification we will always conduct a balancing exercise to ensure that we consider the impact on you as an individual to ensure that our interests are not overridden by the impact on you. Some examples of activities where we rely on legitimate interests are:

- Sending you direct marketing via post;
- The use of CCTV in certain NSPCC offices for monitoring and security purposes;
- Handling any compliments or complaints in line with our policy.

## Information we may hold about you

During the application process and your time as a volunteer, we will process personal information and sensitive personal information about you. The types of information that we process include:



- name, gender, home address, telephone number and other contact details you provide to us, date of birth, marital status, emergency contacts, bank information
- nationality and passport information
- leave records, supervisions, disciplinary and grievance processes and investigations and incident management
- where appropriate physical disabilities and specific access needs
- the results of credit and criminal background checks, carried out during vetting and rechecked periodically during your volunteering
- screening, health certifications, driving and vehicle information
- information required to comply with requests from law enforcement authorities or court orders
- voicemails, e-mails, correspondence and other work communications created, stored or transmitted by an employee using the NSPCC's computer or communications equipment
- information about physical or mental health or condition in order to monitor sick leave and take decisions as to fitness for volunteering role
- racial or ethnic origin, disabilities, religious or similar beliefs, sexual orientation, gender identity and caring responsibility information where provided in order to monitor compliance with equal opportunities legislation
- information relating to any criminal proceedings for insurance purposes and in order to comply with legal requirements and obligations to third parties.

We also monitor your use and communications via The Volunteer Hub in accordance with the Terms of Use and any other terms or policies that may replace, amend or supplement these policies from time to time.

## **Sharing information**

Your information may be disclosed to staff involved in recruitment [line managers / Volunteer coordinators], consultants, advisers and other appropriate persons.

We sometimes use third parties to process data on our behalf, particularly where we have a database system developed by a third party. Such processing, which may be undertaken outside the European Economic Area, is subject to contractual restrictions with regard to confidentiality and security, in addition to the obligations imposed by Data Protection Laws.

When we outsource the processing of your information to third parties or provide your information to third party service providers, we ensure those third parties protect your information with appropriate security measures and prohibit them from using your information for their own purposes or

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from disclosing your information to others.

We may make information available to regulatory authorities, potential or future employers, governmental organisations, and third parties if required by any regulatory or legal authority.

We reserve the right to disclose any information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our rights or property.

## **Keeping information**

We will keep your information for as long as is necessary to fulfil our legal obligations, and in accordance with Data Protection Laws. This means that personal information about unsuccessful volunteer candidates will be held for 18 months for the purposes of reporting after the recruitment exercise has been completed, it will then be destroyed or deleted.

When you start volunteering with the NSPCC, we will compile a file relating to your activities with us. The information contained in this will be kept securely and will only be used for purposes directly relevant to your volunteering. Once you stop volunteering, we will retain the file for a period of 7 years and at the end of that period the personal information in your file will be securely and permanently deleted. If you join NSPCC Alumni on finishing volunteering your record will be kept whilst you are part of the programme and deleted seven years after leaving the programme.

### How we use cookies

Our cookie policy details the cookies we use, their purposes and how to agree to non-essential cookies.

## Your rights

If you'd like to access any of your rights, please contact us using the information below.

a. Right to access your personal data

You have the right to access the personal data that we hold about you in many circumstances, by making a request. This is sometimes termed 'Subject Access Request'. If we agree that we are obliged to provide personal data to you (or someone else on your behalf), we will provide it to you or them and aim to do so within 30 days from when your identity has been confirmed. No administration fee will be charged for considering

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and/or complying with such a request unless the request is deemed to be excessive in nature.

We would ask for proof of identity and sufficient information about your interactions with us that we can locate your personal data.

### b. Right to correct your personal data

If any of the personal data we hold about you is inaccurate or out of date, you may ask us to correct it (or you can use the self-serve facility described above.

If you would like to exercise your right, please contact us as set out below.

- c. Right to stop or limit our processing of your personal data You have the right to object to us processing your personal data for particular purposes, to have your information deleted if we are keeping it too long or have its processing restricted in certain circumstances. If you would like to exercise this right, please contact us as set out below.
- d. Right to stop or limit our processing of your personal data You have the right to have personal data erased. This is also known as the 'right to be forgotten'. The right is not absolute and only applies in certain circumstances.

If you would like to exercise this right, please contact us as set out below.

#### e. Right to portability

The right to portability gives you the right to receive personal data you have provided to a controller in a structured, commonly used and machine readable format. It also gives them you the right to request that a controller transmits this data directly to another controller.

If you would like to exercise this right, please contact us as set out below.

You can make any of the above requests by emailing dataprotectionofficer@nspcc.org.uk or by writing to:

**Data Protection Officer NSPCC** Weston House 42 Curtain Rd London EC2A 3NH

To find out more about your rights, to exercise any of your rights, or to contact the Data Protection Officer,

email dataprotectionofficer@nspcc.org.uk or write to: The Data Protection Officer, Weston House, 42 Curtain Road, London EC2A 3NH.

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## **Data Protection Regulator**

If you have any concerns or comments about how we use information, we would like to hear from you. If you are dissatisfied with our response, you may contact the Information Commissioner's Office (ICO) for guidance and advice, or to lodge a complaint. The ICO may be contacted at:

Online: <a href="https://www.ico.org.uk">www.ico.org.uk</a>

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF]

Telephone: 0303 123 1113 (local rate) or 01625 545 745 (national rate)