# Privacy Notice - Volunteers

Effective date: 15 October 2021

## Controller Details

Royal National Institute of Blind People

The Grimaldi Building

154a Pentonville Road

London

N1 9JE

**Help line Number**: 0303 123 99 99

## Data Protection Details

The Data Protection Officer

RNIB

The Grimaldi Building

154a Pentonville Road

London

N1 9JE

**Email:** [**DataProtectionOfficer@rnib.org.uk**](mailto:DataProtectionOfficer@rnib.org.uk)

## Our Privacy notice

This privacy notice describes how and why RNIB uses your personal and sensitive information when volunteering with us, and how we protect your privacy, rights, and choices regarding this information. We promise to respect any of your personal information which is under our control and to keep it safe. We aim to be clear when we collect your information and about what we will do with it.

RNIB provides a service to prospective and current volunteers. It offers support and management to them to ensure that their engagement is fair and in line with our core values as well as lawful. Our use of personal and sensitive data allows us to make better decisions and ensures that we provide the best support and management to our volunteers.

There may be occasion when the specific nature of your volunteering necessitates an additional privacy notice, or supplementary terms and conditions. This may arise because of the nature of information about you that needs to be collected, and / or how that information will be processed. In such circumstances you will be provided with the relevant terms and conditions or policy notice.

### Who we are

In this Privacy Policy, “Royal National Institute of Blind People”, “we”, or “our” means Royal National Institute of Blind People. A registered charity in England and Wales (no. 226227), Scotland (no. SC039316) and the Isle of Man (no. 1226). Also operating in Northern Ireland. A company incorporated by Royal Charter. Registered in England and Wales (no. RC000500). Registered office 105 Judd Street, London WC1H 9NE

### Who we define as volunteers

Anyone who gives their time free of charge in support of our work is considered to be a volunteer. There are five forms of volunteering with RNIB:

1. Performing a task or role prescribed by RNIB, where the individual is representing the charity in execution of said task / role.
2. Participating in an activity where the individual is drawing upon lived experience / personal perspectives to inform and / or shape the work of the charity. In such activities, the individual is representing themselves, but not representing RNIB. Examples include participation in consultation exercises, focus groups and research panels.
3. Participating in a story-telling exercise, where RNIB shares with the wider public a personal story about the individual. In this regard the individual is volunteering to act as a case study. Such promoted stories can include written, photographic, audio and video content.
4. Acting as a Trustee or committee member of the charity.
5. Participating in a work placement or internship.

### How we collect information about you

#### Information you provide to us directly

We collect information in the following ways through information you provide to us directly:

* You may give us your information when you apply to volunteer with us
* When we onboard you
* When you receive training
* When you tell us you want to stop volunteering
* When you request support or advice
* If you ask a question
* If you make a complaint
* When you update your information
* If you inform us that you are unwell
* If you report an incident/accident
* If you make a claim on our insurance due to an accident / incident.

#### Information you provide us indirectly

Your information may be shared with us by 3rd parties:

* When you apply to volunteer with us.
* If you have applied via a 3rd party website or organisation to volunteer with us.
* You have been successful in your interview and we need to carry out pre-volunteering checks which will be done by 3rd party organisations

### What personal information we collect

* Name
* Contact details (including postal address, telephone number, e-mail address)

The following may be collected in some circumstances:

* Date of birth
* Age
* Gender, disability, ethnicity, sexual orientation (for the purposes of equality monitoring)
* Criminal record history
* Next of kin/emergency contact information
* Identification documents
* Proof of eligibility to work in the UK
* Bank details
* Training records
* Sickness / health records
* Other diagnosed and health conditions.

Certain types of personal information are in a special category under data protection laws, as they are more sensitive. Examples of this type of sensitive data would be information about health or ethnicity.

We only collect this type of information when there is a clear reason for us to do so. For example, asking for health information, is to assist you with the service we provide you, to ensure we meet your specific needs. Wherever it is practicable for us to do so, we will make clear why we are collecting this type of information and how it will be used.

You do not have to provide us with details of personal characteristics such as gender, ethnicity, religious / philosophical beliefs, disability, and sexual orientation. We process this information for equality monitoring purposes but will not use this information for anything else unless we have your consent to do so.

**Criminal record history / convictions**: We may collect this information as part of the recruitment and onboarding process where appropriate given the nature of your role and where we are legally able to do so, to ensure we makes safe recruitment decisions.

### How we use your information

#### Recruitment of volunteers

The information we collect from you will be used to determine your suitability for a role which will include, application forms / CVs, interviews, reference, and criminal record checks. Some of the information we have about you may have been provided via third party organisation, when you apply for a role via a third party, or when you agreed to have checks, such as references and criminal records.

#### Volunteer management

Manage all aspects of the volunteer relationship, including, but not limited to, onboarding, travel and expenses, training and development, performance appraisal, communications, equal opportunities monitoring, leaver process, and other general administrative and human resource related processes.

#### Health & Safety

Manage all aspects of volunteer safety, and safety of all non-employees including customers, contractors, and members of the public.

#### Managing our systems

Manage systems in order to administer the security and access to IT platforms and applications ensuring monitoring and assessing compliance with our policies and standards. The system is also used to respond to and manage Subject Access Requests.

### Lawful Basis for Processing

Data protection laws mean that each use we make of personal information must have a “lawful basis”. The relevant lawful basis is set out in the General Data Protection Regulation (EU Regulation 2016/679) and in current UK data protection legislation.

#### Contract

As a volunteer, you have entered into an agreement (Volunteering Commitment) to provide a service to RNIB, or to undertake activities for the benefit of our work. We process data for the purpose of recruitment, training, and any expenses to be covered by RNIB.

#### Consent

As a volunteer of RNIB, we may need your consent to send you newsletters or participate in surveys.

#### Legal obligation

We may need to collect and process your personal data when the law or our statutory obligations requires. These reasons include retention and providing information for crime, criminal record/DBS checks, taxation, and reporting.

#### Legitimate interests

We have a basis to use your personal information if it is reasonably necessary for us (or others) to do so and in our / their “legitimate interests” (provided that, what the information is used for, is fair and does not unduly impact your rights).

We consider our legitimate interests to include all day-to-day activities RNIB carry out with personal information. Some examples not mentioned under the other bases above where we are relying on legitimate interests are:

* Managing our services
* Measuring key performance indicators.

We only rely on legitimate interests where we consider that any potential impact on you (positive and negative), how intrusive it is from a privacy perspective and your rights under data protection laws do not override our (or others’) interests in us using your information in this way.

### How we keep your data safe

We ensure that there are appropriate technical and organisational controls in place to protect your personal details. For example, our network is protected and routinely monitored.

### How long we keep your data

Royal National institute of Blind People has specific criteria to determine how long we will retain your information.

* Volunteer personnel records - 3 years from end of volunteering for successful candidates and 6 Months for unsuccessful candidates.
* Incident/Accident Reporting information - 12 years from date of reporting (in respect of children up to the age of 21).
* Health Surveillance records kept for specific Health and Safety legislation – 40 years from last exposure.
* Personnel records in relation to potential Insurance Claims (for child or vulnerable adult abuse) - 50 years from the date of volunteering.

### Sharing your information with other organisations

We will not share your data with any third parties for direct marketing.

Where we are under a legal or regulatory duty to do so, or where we consider it necessary to protect the rights, property or safety of Royal National Institute of Blind People, its personnel, visitors, and users, we may disclose your details to:

* the police
* regulatory bodies including but not limited to HMRC, the Financial Conduct Authorities, the Information Commissioner’s Office, or the Charity Commission
* Any organisation where we have a requirement to share data for the purpose of safeguarding. Please see our Safeguarding Privacy Policy.

RNIB uses third party suppliers under contract as part of our legitimate interests. In order to carry out the contracted services, these suppliers may collect or store personal data as set out in the relevant contracts. These could include:

* Training providers
* IT providers
* Banks
* Funders.

### Your rights

* **Right to be informed** - This means you have a right to be informed about the way we collect and use your data.
* **Right to Access** - also sometimes called a Subject Access Request - this means you have a right to request a copy of the data we hold about you.
* **Right to Rectification** - This means that you can request that we correct your personal data if it is inaccurate.
* **Right to Restrict Processing** - This means that you can request that processing of your data is limited and your data is stored separately.
* **Right to Data Portability** - This means that under certain circumstances you can request that the data we hold on you be sent to you
* **Right to Object** – This means you have the right to object to processes being carried out under legitimate interest.
* **Right to withdraw consent** – This means in certain instances you have the right to withdraw consent where consent has been used as a lawful basis to process your data.
* **Right to be forgotten** - This means you have the right to have some, or all your data deleted, this applies in certain cases, and is subject to certain exceptions.

### Complaints

If you are unhappy with any aspect of how we are using your personal information we’d like to hear about it. We appreciate the opportunity this feedback gives us to learn and improve. You can find out more by reading our Problem-Solving Procedure.

You also have the right to lodge a complaint about any use of your information with the [Information Commissioners Office](http://www.ico.org.uk/), the UK data protection regulator.

### Changes to Policy

We may change this Privacy Policy from time to time.  If we make any significant changes in the way, we treat your personal information we will make this clear by contacting you directly.

(End of document.)