

Volunteers Privacy Notice

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If you have any suggestions for improving this document, please contact Information Governance Team

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Purpose

This privacy notice tells you what to expect when Kent Community Health NHS Foundation Trust (KCHFT) collects personal information about you during and after your volunteering relationship with us.

We are committed to protecting your privacy and will only use personal data that we collect in line with all applicable laws, including the UK General Data Protection Regulation (UK GDPR).

This privacy notice applies to all prospective, current and former volunteers.

Kent Community Health NHS Foundation Trust is the controller for this information unless this notice specifically states otherwise. Details of our Data Protection Officer can be found in the contact details below.

Contacting us

Our registered address is Kent Community Health NHS Foundation Trust, The Oast, Unit D, Hermitage Court, Hermitage Lane, Barming, Maidstone, Kent ME16 9NT.

We are registered with the Information Commissioner's Office (ICO). Our registration number is: Z2844951.

If you want to request further information about this privacy notice or exercise any of your rights, you can email the Data Protection Officer at kentchft.dataprotectionofficer@nhs.net.

Our commitment to you

We take our duty to protect your personal data and maintain confidentiality very seriously. We are committed to taking all reasonable measures to make sure the personal data we are responsible for, whether this is computerised or in paper form is kept securely.

The information below sets out the basis on how any personal data we collect from you, or that you provide to us, or that we obtain about you will be processed by us. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are committed to ensuring that we do so in a manner that is both lawful and respects your privacy.

Your data protection rights

You have certain rights in relation to your personal information, although those rights will not apply in all cases or to all the information that we hold about you. For example, we may need to continue to hold and process some of your information after you leave your volunteering role to establish, exercise or defend our legal rights.

Right to be informed

You have the right to be informed about how we use the data you provide. We will be transparent in our interactions with you. Any time you give us personal information you have a right to be informed about why we need it and how we will use it. You can find most of the information you need in this Privacy Notice.

Right of access

You have right of access to any of your personal data that we hold about you. You can contact us at any time to gain information about what data we hold about you and why we hold it.

If you make a formal request for your information (Subject Access Request), we will respond to acknowledge your request and may require you to prove your identity to us. We may also ask you to be specific about the information you are seeking to help us make sure we meet your request fully and speed up the process.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

We will provide you with the information that you are entitled to as soon as possible and without unreasonable delay and at the latest within one month of your identity being verified by us.

In exceptional cases we may extend the period of compliance by a further two months if the request(s) are complex or numerous. If this is the case, we will inform you within one month of the receipt of the request and explain why the extension is necessary.

In most circumstances there will be no charge for this right of this access.

Right to rectification

If you believe information we hold about you to be inaccurate or incomplete, you can ask us to correct it at any time for example the spelling of your name or your contact information.

Right to restriction of processing

You also have the right to ask for our processing of your personal data to be restricted. For example, if you are contesting the accuracy of data we are using about you. In such cases we will restrict our processing while we verify the accuracy of the data that we hold.

Right to erasure ('right to be forgotten')

You can also ask for certain information about you to be deleted. For example, if you are moving out of the area. In some cases, we will be unable to delete your information if there are statutory grounds to retain it (i.e. HMRC or other legal requirements).

Right to data portability

You can request the transfer of your personal information to another party.

Right to object

You have the right to ask us not to process your personal data for marketing or profiling purposes.

You can exercise your right to prevent such processing by contacting your Volunteer lead.

You can also exercise the right at any time by contacting the Data Protection Officer by email at kentchft.dataprotectionofficer@nhs.net.

Information we collect from you and what we do with it

If you volunteer with us, you may be recorded or referred to in a variety of our documents and electronic records, including your volunteer profile on our volunteer database.

Some of these records are produced by you, such as your volunteer application form. Others are produced by us recording information you have provided to us, or the activity you undertake with us.

We may sometimes collect additional information from third parties, including former employers in the form of a reference, or when we need to carry out a Disclosure and Barring Service (DBS) check if your role is a regulated activity i.e. working in one of our services with young people.

We have a wide range of volunteering roles and some roles require more personal information to be processed than others. We are always striving to better understand our volunteers, to provide you with a better experience with us. To achieve this, we analyse and research information we have on our volunteers on our database, to group people together in terms of common characteristics. This enables us to better tailor the information we provide to ensure it is relevant and interesting. We do this as we have a legitimate interest in improving your experience as a volunteer.

We have set out below, in a table format, the ways we collect and use your personal information for certain purposes and how it might sometimes be shared with others:

	Information obtained	Purpose	Shared with third parties
1.	Personal contact details, including name, address, telephone, email	To contact volunteers about their application and if successful their volunteering role	**Volunteer database facilitated by CIVICA
2.	Emergency contact details	To be able to contact family or a friend in an emergency	As above
3.	Communication preferences and any marketing preferences.	To be able to contact volunteers with information about the difference we are making together and how else they can get involved	As above
4.	Date of Birth	To ensure all volunteers meet our minimum age requirements and to monitor the age demographics of our volunteer base	As above
5.	Information about any criminal convictions or cautions relating to children and young people	To help make a decision about suitability for volunteering role and association with Kent Community Health NHS Foundation Trust	**DBS check service provider TRAC
6.	Two references	To be contacted to confirm volunteer's identity and suitability for the volunteer role	**Details given via volunteer on application
7.	Job history summary	To review previous work history as part of our safer recruitment procedures	No
8.	Enhanced DBS check where appropriate	To undertake and assess the risk around any previous criminal history	**DBS check service provider TRAC
9.	Information about support needs or any reasonable adjustments that we can make and any individual risk assessment	To understand what extra provision the prospective volunteer might need to undertake the role successfully	No
10.	Photo	To produce your volunteer ID card	Trust own ID provider
11.	Personal profiling information (gender, ethnicity, disability)	To be aggregated anonymously into statistics about our volunteers demographics for monitoring purposes and reported to funders	No
12.	Volunteer 1:1 supervision / support notes	To review volunteer performance, experience, safeguarding, learning needs	**Volunteer database facilitated by CIVICA

We may also collect from you:

Information about your race or ethnicity, religious beliefs, and sexual orientation will be used anonymously only for equal opportunity monitoring to better understand our volunteers and where we may need to improve our diversity and inclusion practices.

Information about your support needs and health, including any relevant medical condition will be used to comply with our health & safety obligations and enable any reasonable adjustments to be made.

Information about criminal convictions and offences as part of the volunteer recruitment process when a volunteering role requires this.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we 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.

On rare occasions we may have to process your personal information without your knowledge or consent, for example in compliance with our legal requirements regarding HMRC etc. From time to time we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

Failure to provide information

If you do not provide certain information when requested, we may be unable to deliver on some elements of the volunteering arrangement or, in some circumstances, to comply with our legal obligations (such as to ensure the safeguarding or health and safety of our clients, volunteers, staff or other beneficiaries). In such instances we will inform you about the implications of the decision and whether we are able to continue with the volunteering arrangement.

Legal basis for using your personal information

Kent Community Health NHS Foundation Trust relies on the following legal conditions that are described in the UK General Data Protection Regulation to use your personal information in the ways described in this privacy notice:

- You give us your explicit **consent** to do so such as applying for a volunteer role.
- **Legitimate interest:** where we have a legitimate interest to do so in support of our aims and activities as an NHS trust. We also have a legitimate interest in being able to use and process personal information for internal administrative purposes, and when it is necessary to protect our IT network, data security and ourselves (and volunteers) from risks such as fraud, criminal conduct or reputational damage. When processing your personal information based on a legitimate interest, we will make sure that it is exercised proportionately and is always balanced against the privacy rights and other legal rights you have as an individual.
- The processing is necessary to protect your vital interests or someone else's vital interests, e.g. where the data subject is physically or legally incapable of giving consent.
- The processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity.

Special Category data

This is where we need to process any special categories of information about you i.e. information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership, processing of genetic or biometric data for the purpose of uniquely identifying individuals, health data, or data concerning your sex life or sexual orientation, we must have a further lawful basis for the processing;

We may use special category personal information about you without your consent only in such instances where:

- We need to protect your vital interests (or those of someone else) in an emergency.
- We have a need to use such information in connection with a legal claim.
- You have already made such information public, such as religious or philosophical beliefs or political opinions.

Communicating with you

We will communicate with you as required to initially process your volunteer application and then, as an active volunteer, to provide you with the support and information you need to undertake your volunteer role.

If your role is a public facing role that involves talking about Kent Community Health NHS Foundation Trust we may include some of your personal data in how you support our work, case studies and other ways that people can support us. We will do this as we have a legitimate interest in supporting your volunteering role. You may decline for us to use your data for this purpose at any time.

You will also receive administrative communications from our Volunteering Team that are related to your volunteering such as a welcome email, volunteer survey and thank you communications.

Information we share with third parties

We will share your personal information with third parties where required by law, where it is necessary to administer the volunteering relationship with you; where we have another legitimate interest in doing so; or you have specifically agreed that we may share your personal information with them.

** The following volunteer-related activities are carried out for us under contract, by third-parties:

- Your referees provide a reference for your volunteering with us.
- Our ID card scheme provider issues ID cards for volunteers.
- Any KCHFT DBS umbrella body - TRAC.
- Volunteer database facilitated by CIVICA

We may disclose aggregate statistics about our volunteers and supporters to describe our services and operations to prospective partners, advertisers, other reputable third parties and for other lawful purposes. These statistics do not include any information that identifies people.

Where we store your information and how we keep it safe

Your information is held on systems that are maintained and managed securely by KCHFT. We ensure that there are technical controls in place to protect your personal details.

We undertake regular reviews of who has access to information that we hold to ensure that your information is only accessible by appropriately trained staff, volunteers and contractors.

We use trusted external companies to collect or process data on our behalf. We do extensive checks on these companies before we work with them and put a contract and data protection agreement in place prior to any work taking place, that sets out our expectations and requirements, especially regarding how they manage the personal data they collect or have access to.

On occasion we may need to disclose your details if required, to the police, regulatory bodies or legal advisors. You may not be informed when this happens.

Wherever possible we store our information about volunteers in the UK or within the European Economic Area (EEA).

How long we keep information about you

We will only use and store personal information for as long as it is required for the purposes it was collected for.

We have a data retention policy (available on request) that sets out the different periods we retain personal information in accordance with our duties under applicable data protection law and various legislative requirements. When you leave your volunteering role some personal information may be

retained by us in archives for safeguarding, administrative, legal or historical research purposes and we do this in a manner that complies with applicable data protection law.

We continually review what personal information and records we hold and delete what is no longer required.

Making a complaint

Kent Community Health NHS Foundation Trust tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to bring it to our attention if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If a person is unhappy and wants to complain they are able to contact:

Patient and Advice Liaison Service (PALS):

Phone: 0800 030 4550

Text: 07899 903499

Email: kentchft.PALS@nhs.net

Web: www.kentcht.nhs.uk/PALS

Open 8am to 5pm Monday to Friday.

Patient Advice and Liaison Service (PALS)
Kent Community Health NHS Foundation Trust
Trinity House
110-120 Upper Pemberton
Eureka Park
Kennington
Ashford
TN25 4AZ

This privacy notice was drafted with brevity and clarity in mind. It does not provide exhaustive details of all aspects of KCHFT's collection and use of personal information. However, we are happy to provide any additional information or explanation needed. Any requests for this should be sent to:

kentchft.dataprotectionofficer@nhs.net

If you believe that KCHFT has not complied with your data protection rights, you can complain to the Information Commissioner's Office, their address is Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by calling 0303 123 1113.

Changes to this notice

This privacy notice may be updated from time to time, so you may wish to check it each time you submit information to KCHFT. The date of the most recent revisions will appear on this page. We may notify supporters of any major changes by placing a notice on the website or by contacting you directly.