

Privacy notice for volunteers



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1. What is the purpose of this document?

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

This privacy notice describes how we collect and use personal information about you during and after your volunteer engagement with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

It applies to all volunteers.

ShelterBox Trust is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This notice applies to current and former volunteers. This notice does not form part of any volunteer agreement. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

It is important that you read and retain this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using that information and what your rights are under the data protection legislation.

2. Data Protection Principles

We will comply with data protection law, which says that the personal information we hold about you must be:

- 1. Used lawfully, fairly and in a transparent way.
- 2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- 3. Relevant to the purposes we have told you about and limited only to those purposes.
- 4. Accurate and kept up to date.
- 5. Kept only as long as necessary for the purposes we have told you about.
- 6. Kept securely.

3. The kind of information we hold 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 person's identity has been removed (anonymous data).



There are certain types of more sensitive personal data which require a higher level of protection, such as information about a person's health, sexual orientation or criminal convictions.

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

- Identification data: such as your name, title, signature, marital status, dependants, volunteer ID, your photo (if voluntarily provided by you), business email address, business address, business landline, business mobile number, citizenship, nationality, passport/ID data, bank details, background check information, CV and cover letter, application form or other information submitted in the application to volunteer process, references, and drivers' licence information.
- **Personal information**: such as your date and place of birth, emergency contact details, next of kin details, gender, confidential information for Proof of Life forms.
- Contact details: such as your home address, telephone number and email address.
- Information about your volunteering role and experience: such as your volunteering experience, training and development records, photos of volunteering activities (used with your consent), position, business title, support roles, education history and qualifications, and suitability for particular volunteering roles, volunteering start date, volunteering records (including location and duration of volunteer activities and training records), arranging for the termination of the volunteer engagement and reason for leaving.
- Time, and systems / buildings access monitoring information, such as CCTV images, swipe card access, time recording software, internet, email, and telephone usage data.
- **Performance information**, such as performance reviews and evaluations, information about complaints or allegations (including supporter or programme participant complaints), the investigation process and any warnings, details of grievances and any outcome.
- Availability information, such as dates of availability for volunteering, leave of absence/vacation, maternity/paternity/shared parental leave, confirmation of a birth of a child, training/educational leave, family care leave, medical leave, sick leave.
- Organisational data including IDs for IT systems, company details, cost centre allocations, and organisations.
- **Travel data** such as journeys made for volunteering purposes including overseas travel, train journeys, and car journeys.

We may also collect, store and use the following more sensitive types of personal information:

Health and medical data, such as information about your health and any medical condition, sickness records, information on work-related accidents for purposes of insurance compensation, work safety and compliance with legal obligations (such as reporting obligations); information on disability for purposes of accommodating the work place and compliance with legal obligations; information on statutory parental leave for purposes of volunteer planning and compliance with legal obligations; where you leave our roster of volunteers and the reason for leaving is related to your health, information about that condition.



- Criminal records data, in the event that ShelterBox Trust has conducted or received the
 results of criminal records background checks in relation to you, where relevant and
 appropriate to your role.
- Race, religion or ethnicity data, such as information contained in your passport or other
 citizenship or information collected for visa and immigration purposes, and information which
 you have voluntarily provided to ShelterBox Trust for the purposes of our equal opportunities
 and diversity monitoring and initiatives
- Sexual orientation data, such as sexual orientation or marital status where this has been
 provided voluntarily to ShelterBox Trust for the purposes of our equal opportunities and
 diversity monitoring and initiatives.
- Genetic information and biometric data, such as personal data relating to the inherited or
 acquired genetic characteristics of a natural person that give unique information about the
 physiology or health of that natural person, facial recognition, fingerprint or retinal scans.

4. How is your personal information collected?

We collect personal information about volunteers through the application and recruitment process, either directly from candidates or sometimes from other charities or a background check provider, the Disclosure and Barring Service or equivalent overseas agencies.

We will collect additional personal information in the course of volunteer-related activities throughout the period of your volunteering engagement with us.

5. How we will use information about you

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

- 1. Where we need it in order to make use of the volunteer engagement you have afforded us.
- 2. Where we need to comply with a legal obligation.
- 3. Where it is necessary for legitimate interests pursued by us or a third party and your interests and fundamental rights do not override those interests.

We may also use your personal information in the following situations, which are likely to be rare:

- 4. Where we need to protect your interests (or someone else's interests).
- 5. Where it is needed in the public interest or for official purposes.

Situations in which we will use your personal information

We need all the categories of information in the list above primarily to allow us to make use of the volunteer engagement you have afforded us. In some cases we may use your personal information to



pursue legitimate interests, provided your interests and fundamental rights do not override those interests. The situations in which we will process your personal information are listed below. To help clarify these we have set out below a list of reasons why we collect and use this data (the "Processing Purposes"). We can only collect and use this data if we have a valid legal basis for doing so, and we are required to explain the various legal bases that we rely on to you.

To give you the full picture, we have set out each of the reasons why we collect and use personal information, i.e. the Processing Purposes, and mapped these against the different legal bases that allow us to do so.

Processing Purposes	Legal Bases
Administering the recruitment process, including review of application, covering letter, C.V, obtaining references, carrying out checks with the Disclosure and Barring service (or equivalent) checking, making a decision about your recruitment or appointment, which involves the processing of identification data, personal information, contact details, information about your volunteering role and experience, performance information; availability information and organisational data	 Necessary for performing the volunteer agreement entered into with you as the data subject, Legitimate interests of ShelterBox Trust
Administering our volunteer programme including managing volunteer activities, tracking volunteering hours, tracking internet, email and telephone usage, providing performance evaluations, entity and intra-entity volunteering and team management, managing and monitoring business travel, carrying out workforce and volunteer analysis, assessing qualifications for a particular role or task, providing references, and administering education, training and development, making decisions about your continued volunteer engagement, making arrangements for the termination of your volunteer engagement, which involves the processing of identification data, contact details, information about your volunteering role and experience, performance information; availability information and organisational data and travel data	 Legitimate interests of ShelterBox Trust Necessary for performing the volunteer agreement entered into with you as the data subject
Providing IT systems and support to enable you and others to perform their volunteer engagement, to enable our business to operate, and to enable us to identify and resolve issues in our IT systems, and to keep our systems secure which involves processing almost all categories of personal information.	 Necessary for performing the volunteer agreement entered into with you as the data subject, Legitimate interests of ShelterBox Trust Compliance with legal obligations to which ShelterBox Trust is subject in relation to data protection law



Communicating with you, other ShelterBox Trust and				
affiliate employees, volunteers and third parties (such				
as existing or potential implementing partners, suppliers,				
supporters, volunteers, programme participants or				
government officials), which may include sharing your				
contact details with ShelterBox staff, affiliates, volunteers or				
third parties you will be working with, which_involves the				
processing of identification data, contact details, information				
about your volunteering role and experience, performance				
information; availability information and organisational data				
and travel data				

- Necessary for performing the volunteer agreement entered into with you as the data subject
- Legitimate interests of ShelterBox Trust
- Compliance with legal obligations to which ShelterBox Trust is subject

Communicating with your designated contacts in the case of an emergency which involves the processing of contact details, personal information, information about your volunteering role and experience, and organisational data and travel data;

- Necessary to protect your vital interests as a data subject
- Legitimate interests of ShelterBox Trust

Responding to and complying with requests and legal demands from regulators or other authorities in or outside of your home country which involves the processing of identification data, personal information, contact details, information about your volunteering role and experience, performance information; availability information and organisational data and travel data

- Compliance with legal obligations to which ShelterBox Trust is subject
- Legitimate interests of ShelterBox Trust

Complying with corporate financial responsibilities, including accounting and audit requirements (both internal and external) and cost/budgeting analysis and control which involves the processing of identification data, contact details, information about your volunteering role and experience, performance information; availability information and organisational data and travel data

- Compliance with legal obligations to which ShelterBox Trust is subject
- Legitimate interests of ShelterBox Trust

Complying with regulatory responsibilities, including anti-bribery, anti-money laundering, data protection, safeguarding and whistleblowing requirements which involves the processing which involves processing of identification data, personal information, contact details, information about your volunteering role and experience, performance information; availability information and organisational data and travel data

- Necessary for performing the volunteer agreement entered into with you as the data subject
- Legitimate interests of ShelterBox Trust
- Compliance with legal obligations to which ShelterBox Trust is subject in relation to data protection law,

Where we have referred to the legitimate interest of ShelterBox trust or third parties, this may include:

- Gathering evidence for possible complaints or allegations and their investigation.
- Dealing with legal disputes involving you, or other staff or volunteers, including accidents at work.



- Ascertaining your fitness to volunteer and making decisions about your continued volunteer engagement.
- Managing availability and absence.
- Protecting your health and safety in the workplace and complying with health and safety obligations.
- Operating a whistleblowing scheme
- Preventing fraud, misuse of IT systems, bribery, corruption or money laundering.
- Monitoring your use of our information and communication systems to ensure compliance with our IT policies.
- Ensuring physical security in our office and network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- Conducting data analytics studies to review and better understand volunteer retention and attrition rates, our people and how they interact with us.
- Equal opportunities monitoring.

When relying on the legitimate interests basis for processing your personal data, we will balance the legitimate interest pursued by us and any relevant third party with your interests and fundamental rights and freedoms in relation to the protection of your personal data to ensure it is appropriate for us to rely on legitimate interests and to identify any additional steps we need to take to achieve that balance.

If you fail to provide personal information

If you fail to provide certain information when requested, we may not be able to make use of your offer to volunteer for us, or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our staff and volunteers).

Change of purpose

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.

Please note that 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.

6. How we use particularly sensitive personal information

Special categories of particularly sensitive personal information, such as information about your health, racial or ethnic origin, or sexual orientation, require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy documents and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with your explicit written consent.



- 2. Where we need to carry out our legal obligations or exercise rights in connection with your volunteer engagement.
- 3. Where it is needed in the public interest, such as for equal opportunities monitoring.
- 4. Where it is necessary to protect you or another person from harm.

Less commonly, we may process this type of information where it is needed in relation to legal claims 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.

Situations in which we will use your sensitive personal information

In general, we will not process particularly sensitive personal information about you unless it is necessary for performing or exercising obligations or rights in connection with your volunteer engagement. On rare occasions, there may be other reasons for processing, such as it is in the public interest to do so. The situations in which we will process your particularly sensitive personal information are listed below.

In addition, we have set out below the processing purposes and different legal bases for the processing of sensitive personal data:

Processing Purpose	Legal Bases
Volunteer and workforce planning, compliance with legal and regulatory obligations, insurance compensation and providing a safe and accommodating workplace may require health and medical data, such as information on work-related accidents, information on your physical or mental health and disability status or protected characteristics, and information on parental leave	Necessary to carry out the obligations and to exercise specific rights of ShelterBox Trust or for you in the field of health and safety and social protection law as permitted by the data protection law
Criminal records and other background checks, in relation to you, where relevant and appropriate to your role	 Your explicit consent as allowed by the data protection law Necessary to carry out the obligations and to exercise specific rights of ShelterBox Trust or for you in the field of social protection law as permitted by the data protection law Necessary for reasons of substantial public interest as permitted by the data protection law
Right to visa and immigration checks may involve us using race or ethnicity data such as information contained	Your explicit consent as allowed by the data protection law



in your passport or other citizenship and right to work documentation or information collected for visa and immigration purposes	 Necessary to carry out the obligations and to exercise specific rights of ShelterBox Trust or for you in the field of social protection law as permitted by the data protection law Necessary for reasons of substantial public interest as permitted by the data protection
Safeguarding: If we reasonably believe that you or another person are at risk of harm and the processing is necessary to protect you or them from physical, mental or emotional harm or to protect physical, mental or emotional well-being	Necessary to protect the vital interests of a data subject Legitimate interests of ShelterBox Trust
Equal Opportunities: We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual orientation to ensure meaningful equal opportunity monitoring and reporting.	 Your explicit consent as allowed by the data protection law Necessary for reasons of substantial public interest as permitted by the data protection law

Do we need your consent?

We do not need your consent if we use special categories of your personal information in accordance with our written policy to carry out our legal obligations or exercise specific rights. In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with 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. You should be aware that it is not a condition of your engagement with us that you agree to any request for consent from us.

We do not need your consent where the purpose of the processing is to protect you or another person from harm or to protect your well-being and if we reasonably believe that you need care and support, are at risk of harm and are unable to protect yourself.

7. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This is usually where that processing is necessary to carry out our obligations and provided we do so in line with our Data Protection Policy.



We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the volunteering role and where we are legally able to do so. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you volunteering for us. We will use information about criminal convictions and offences to decide whether you are an appropriate person to be employed in a particular role.

We are allowed to use your personal information in this way to carry out our obligations to ensure the protection of children and vulnerable adults that may come into contact with ShelterBox staff, volunteers and contractors and to protect our legitimate interests when processing confidential personal information regarding supporters, programme participants, staff, volunteers, and contractors. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

8. Automated decision-making

Automated decision-making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision-making in the following circumstances:

- 1. Where we have notified you of the decision and given you 21 days to request a reconsideration.
- 2. Where it is necessary for the purposes of your volunteer engagement and appropriate measures are in place to safeguard your rights.
- 3. In limited circumstances, with your explicit written consent and where appropriate measures are in place to safeguard your rights.

If we make an automated decision on the basis of any particularly sensitive personal information, we must have either your explicit written consent or it must be justified in the public interest, and we must also put in place appropriate measures to safeguard your rights.

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making, unless we have a lawful basis for doing so and we have notified you.

We do not envisage that any decisions will be taken about you using automated means. However, we will notify you in writing if this position changes.

9. Data sharing

We may have to share your data with third parties, including third-party service providers and other entities in the ShelterBox network.



We require third parties to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the UK.

If we do, you can expect a similar degree of protection in respect of your personal information.

Why might you share my personal information with third parties?

We will share your personal information with third parties where required by law, where it is necessary to administer the volunteering activity you are involved in or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

Third parties include regulators, such as the Charity Commission, third-party service providers (including auditors, insurance providers, travel agents, contractors and designated agents) and other entities within the ShelterBox network of affiliates. Part or all of the following activities are carried out by third-party service providers: travel, insurance, and IT services.

How secure is my information with third-party service providers and other entities in the ShelterBox network?

All our third-party service providers and other entities in the ShelterBox network are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

When might you share my personal information with other entities in the group?

We will share your personal information with other entities in our group in order to organise travel, deployments, media and fundraising activities and to report on the work of the ShelterBox network of affiliates globally.

We will share your personal information with relevant staff and volunteers for the purpose of assessing safety and security for deployable teams and deployment coordination.

What about other third parties?

We may share your personal information with other third parties, for example in the context of the possible restructuring of the organisation. In this situation we will, so far as possible, share anonymised data with the other parties before the restructuring completes. Once the restructuring is completed, we will share your personal data with the other parties if and to the extent required under the terms of the restructuring.

We may also need to share your personal information with a regulator or to otherwise comply with the law. This may include making returns to the Charity Commission or Companies House.

Transferring information outside the UK

In some cases, organisational, financial and technical considerations may require us to use the services of a service provider outside the European Economic Area (EEA), which may result in your



personal data being transferred, processed or stored outside of the EEA. This may include a country which does not have the same level of data protection as in the United Kingdom

However, to ensure that your personal information does receive an adequate level of protection, we have put in place the following appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects UK law on data protection: use of the International Data Transfer Agreement or the EU Standard Contractual Clauses and Addendum with relevant service providers. Further information about these protective measures is available from the data protection lead (DPL).

10. Data security

We have put in place measures to protect the security of your information. Details of these measures are available from the DPL.

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

We 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. Additionally, we limit access to your personal information to those employees, volunteers, 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.

We protect your personal information in a range of ways including secure servers, firewalls and SSL encryption. We operate a policy of restricted, password controlled, access to any of your information which is stored on our systems.

We 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 we are legally required to do so.

11. Data retention

How long will you use my information for?

We will only retain your personal data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Details of retention periods for different aspects of your personal information are available in our Data Retention Policy and Information Retention and Disposal Schedule which are available on the Policy Resource, here: The Policy Resource - Home (sharepoint.com).

To determine the appropriate retention period for personal data, we 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 purposes for which we process your personal data and whether we can achieve those purposes through other means.
- The applicable legal requirements.

In some circumstances, we may anonymise your personal information so that it can no longer be associated with you, in which case we may use that information without further notice to you. Once you are no longer volunteer, we will retain and securely destroy your personal information in accordance with our Data Retention Policy.

12. Rights of access, correction, erasure and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your volunteer engagement with us.

Your rights in connection with personal information

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

- Request access to your personal information (commonly known as a data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us 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 we 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. You also have the right to object where we are processing your personal information for direct marketing purposes.
- 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 personal information to another party.
- Right to object to automated decision-making Under certain circumstances you may have
 the right to object to the processing of your personal data including any profiling being carried
 out on your personal data. This can include requesting human intervention with regards to an
 automated decision that was made, so that you can express your view and contest the
 decision.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data or automated decision making, or request that we transfer a copy of your personal information to another party, please contact the DPL in writing.



No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in these circumstances.

What we may need from you

We 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.

13. 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 at any time. To withdraw your consent, please contact the DPL. Once we 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 we have another legitimate basis for doing so in law.

14. How to contact the DPL or ICO

Data Privacy Lead

The DPL oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPL using the Contact Details set out below:

Email address: Privacy@ShelterBox.org

Postal addresses: Data Privacy Lead, ShelterBox, Falcon House, Charles Street, Truro, TR1 2PH

Information Commissioner's Office

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 (www.ico.org.uk). We would, however, appreciate the chance to deal with your concerns before you approach the ICO, so please contact us in the first instance.

15. Changes to this Privacy Notice

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

If you have any questions about this privacy notice, please contact the DPL.



l,	(volunteer	name),	acknowledge	that	on
volunteers and that I have read	(date), I received a	copy of the SI	nelterBox Trust pri	vacy notic	ce foi
volunteers and that I have read	and understood it.				
Signature					
Name					
Name					