

## Data Protection Policy

<b>Date this policy comes into effect:</b>	<b>May 2018</b>
<b>Next review</b>	<b>May 2021</b>

### Introduction and need for a policy

Volunteer Action needs to gather certain information about individuals. These can include customers, suppliers, business contacts, employees, volunteers and other people the organisation has a relationship with or may need to contact. This policy describes how this personal data will be collected, handled and stored to meet Volunteer Action's data protection standards and to comply with the law.

### Why this policy exists

This data protection policy ensures Volunteer Action:

- Complies with data protection law and follows good practice
- Protects the rights of staff, volunteers, customers and partners
- Is open about how it stores and processes individuals' data
- Protects itself from the risk of a data breach

This policy applies to:

- The office of Volunteer Action
- All staff and volunteers of Volunteer Action

### Information we collect and how we use it

This can include:

- Names of individuals
- Postal addresses
- Email addresses
- Telephone numbers
- Information relating to individuals including mobility and health issues
- Recruitment and payroll information



We may use it to:

- Process donations and claim gift aid
- Provide our services
- Administer volunteering
- Keep employment records
- Invite you to participate in surveys

### **How we collect information**

We may collect information:

- By phone
- By filling in application/membership forms or gift aid agreements
- By referrals from other agencies

We will always confirm these details with you personally by phone and occasionally by a home visit

### **The legal basis for using personal data**

- In some cases we may have your specific consent
- In general, we process personal information on the 'legitimate interests' basis. We would not be able to provide the services we offer without this information.

### **General staff and volunteer guidelines**

- The only people to access data covered by this policy should be those who need it for their work.
- Data should not be stored informally.
- When access to confidential information is required (outside of the normal practice) staff and volunteers should refer to the Volunteer Action manager or Deputy Manager.
- Employees and volunteers must keep all data secure, by taking sensible precautions and following this policy.
- Personal data should not be disclosed to unauthorised people, either within Volunteer Action or externally.
- Data should be annually reviewed and updated if it is found to be out of date.

A breach of the data protection regulations or failure to adhere to Volunteer Action's policies could have serious repercussions for Volunteer Action and for anyone found to be responsible. It may be treated as a serious disciplinary matter and may result in the termination of employment or of our volunteering agreement with you. Any such breach must be brought to the attention of the manager.

## Data Storage

These rules describe how and where data should be safely stored.

- When data is stored on paper, it should be kept in a secure place where unauthorised people cannot see it. This also applies to data that is usually stored electronically but has been printed out for some reason.
- Data printouts should be shredded and disposed of securely when no longer required. This includes information sent to volunteers that is essential to their role.
- If data is stored on removable media (like a CD or DVD), these should be kept locked away securely when not being used.
- Data should only be stored on designated drives and servers.
- Data should be backed up frequently and the backups should be tested regularly.
- Data should never be saved directly on to mobile devices unless those devices stay within a secure office environment or the data is deleted as soon as the data is no longer required - a drive plan for example.
- All servers and computers containing data should be protected by approved security software and a firewall.
- Volunteer drivers are reminded on every occasion that they receive information regarding a drive that they must destroy the information after use.
- Personal data should never be shared informally. All volunteers and staff are required to sign a confidentiality agreement before commencing their role.
- Financial records will be kept for a period of 7 years
- Personal information relating to service providers and service users will be kept for a period not exceeding 36 months from the time the individual no longer volunteers for or uses the service. Exceptions to this will be where we believe there may be future contact regarding a complaint or accident etc.

## Data accuracy

- The law requires Volunteer Action to take reasonable steps to ensure data is kept accurate and up to date.
- It is the responsibility of all employees who work with data to take reasonable steps to ensure this, for instance, by confirming customers' details when they call and making corrections as soon as inaccuracies are discovered.
- Data will be kept in as few places as necessary. Staff should not create any unnecessary additional data sets.

## An individual's rights

- To request access to a copy of the personal information we hold, together with why we use it, who we share it with and how long we keep it
- To object to the processing of personal information
- To withdraw consent at any time
- To ask for changes to improve accuracy and completeness
- To delete personal information where it is no longer needed or there is no longer a lawful basis for keeping it
- To ask for your personal information in an electronic format which can be easily transferred

- To restrict the personal information where we have been asked for it to be erased or there has been an objection
- To not be the subject of automated decision-making

The manager will aim to provide the relevant data within 14 days. Volunteer Action would not normally make a charge to process a request unless a significant resource was required. The identity of anyone making a subject access request will always be verified before any information is given.

### **Disclosing data for other reasons**

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, Volunteer Action will disclose requested data. However, the manager of Volunteer Action will ensure the request is legitimate, seeking assistance from the Board of Trustees and from Volunteer Action's legal advisors where necessary.