



Volunteer Privacy Notice

1. Introduction

This notice provides details about how Spurgeon's College uses your personal information while you are a Volunteer with us. As a volunteer you may have certain legal and contractual responsibilities to protect the personal information of other people (e.g. other employees, students, research participants) by handling it appropriately.

The College is the 'Data Controller' of your personal data and is subject to the General Data Protection Regulation 2016 (GDPR). We are registered with the Information Commissioner's Office (ICO).

2. What is personal information (also known as a personal data)?

'Personal information' means any information about you from which you can be identified from that information alone or taken together with other information. It does not include data where your identity has been removed and where you can no longer be identified (anonymised data). It is important that the personal information that we hold about you is accurate and current. Please keep us informed if your personal information changes during your time at the College.

3. How does this notice relate to other information about data protection?

It is important that you read this notice, together with any other relevant policies such as the College Data Protection Policy.

4. What personal information do we collect?

We only collect the data we need and keep that data up to date.

Personal data the College needs to collect use and retain, relating to or about you, includes:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- Bank account details, if we have agreed to reimburse any expenses

- Start date
- Location of voluntary work
- Copy of driving licence or passport as proof of identity
- Details about your role(s) in the College, including any information relating to your undertaking of such role(s)
- CCTV footage and other information obtained through electronic means such as swipe card records
- Photographs
- Information about your use of our information and communications systems.
- Information about your use of academic and non-academic facilities and services that we offer.

5. Special Category Data

The College will also process some information about you that is considered more sensitive and this is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions and offences.

6. How do we collect personal information?

We receive this data directly from you from a variety of different sources, depending on how and where you interact with the College.

We receive a lot of this data from you when you:

- Submit an application to volunteer at the College
- Complete your new starter forms
- Supply your passport or other identity documents at the start of your work placement, at other times when necessary during your placement with us, or when we ask you to confirm your identity
- Update your personal record during your placement or ask us to update your record in any way
- Supply emergency contact details, in which case we will assume that the person whose details you give us are happy for these details to be shared with us by you
- At various other times when you share it during the course of your placement, for example, during correspondence with you or if your role changes.

If we do not receive information directly from you, we either generate it ourselves (such as your volunteer ID and username), or we receive it from third parties.

Data about you that we receive from third parties may include references, results of criminal records checks, or medical information. We may receive this information from the following third parties:

- Persons or organisations whom you may have named as a referee
- Disclosure and Barring Service
- Occupational Health professionals

7. How do we use your personal information?

We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. Most commonly, we will use your personal information in the following circumstances:

- Where we need to comply with a legal obligation, e.g. under the Health and Safety, or Equality Act legislation.
- Where it is necessary for our public task or our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests, e.g. in order to provide and operate our IT services to staff; in order for you to be able to perform your voluntary role.

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

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

We do not use your personal information to carry out automated decision-making processes.

8. Examples of processing

Examples of the reasons or purposes the College will process your personal information, including, where appropriate, special category personal data include the following:

- To assess your suitability for a particular role or task and deciding whether or not to engage you as a volunteer
- Administering the volunteer agreement that we have entered into with you, including where relevant, its termination
- Business management and planning including accounting and auditing
- Conducting performance reviews, managing performance and determining performance requirements
- Carrying out a disciplinary or grievance or Dignity at Work investigation or procedure in relation to you or someone else
- Making decisions about your continued engagement
- Assessing education, training and development requirements
- Monitoring compliance by you and the College with our policies and contractual obligations

- Monitoring and protecting the security (including the College network, information and electronic communications systems) of the College, of you, our staff, students or other third parties
- Monitoring and protecting the health and safety of you, our staff, students or other third parties
- To support you in implementing any health-related adjustments to allow you to carry out a particular role or task
- Dealing with legal disputes involving you or other employees, workers and contractors, including accidents at work.
- Preventing fraud
- To provide a reference upon request from a third party (with your agreement)
- To comply with health and safety law and other laws which affect the College
- To operate security (including CCTV), governance, audit and quality assurance arrangements, including producing identity cards which also involves the collection and storage of a digital photographs
- To deliver facilities (e.g. IT, libraries) and services, and where appropriate to monitor your use of those facilities in accordance with College policies (e.g. on the acceptable use of IT)
- To communicate effectively with you by email, in the form of newsletters and bulletins with the intention of keeping you informed about important developments and events relevant to your role at the College. Where appropriate you will be given an opportunity to opt out of receiving these communications.
- To invite you to participate in surveys and to compile statistics and conduct research for internal and statutory reporting purposes
- To support your training, health, safety, welfare and religious requirements
- To fulfil and monitor our responsibilities under equalities, immigration and public safety legislation and to monitor the effectiveness of the Equality and Diversity strategy
- To enable us to contact others in the event of an emergency (we will assume that you have checked with the individuals before you supply their contact details to us).

9. How do we use ‘special category’ personal information?

We will only process special category personal information in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, in some circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do, we will provide you with full details for the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent, which you can withdraw at any time, e.g. use of volunteers photographs on the website or other publicity. You should be aware that it is not a condition of your agreement with us that you agree to any request for consent from us.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal condition:

- where we need to carry out our legal obligations e.g. to provide workplace adjustments

- where you have made the data public
- where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent
- where processing is necessary for the establishment, exercise or defence of legal claims
- where it is needed to assess your capacity on health grounds.

We will only process information relating to criminal convictions if it is appropriate given the nature of the role and where it is in accordance with the law. This will usually be where such processing is necessary to carry out our legal obligations.

Less commonly, we may use information relating to criminal convictions where it is necessary for the establishment, exercise or defence of legal claims, where it is necessary 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.

10. Who has access to your personal information and where is it stored?

Your information may be shared internally with members of the HR and Finance teams, your line manager, managers in the area in which you work, and IT, Library and Security staff if access to the data is necessary for performance of their roles.

Data will be stored in a range of different places, including your personal file, in Management information systems, and other IT systems such as the College email system, database, and telephone list.

11. How long do we keep your personal information?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Records Retention Schedule.

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 such information without further notice to you. Once you are no longer a volunteer at the College we will retain and securely destroy your personal information in accordance with our data retention policy and applicable laws and regulations.

12. Who do we share your personal information with?

Your personal information is shared as permitted or required by law, on a considered and confidential basis, with external organisations which may include the following:

- Relevant external service providers of the College, including IT service providers
- Insurance providers

- Relevant Government Departments, executive agencies or non-departmental public bodies (e.g. the Health and Safety Executive), and Higher Education bodies
- Associated organisations e.g. the Baptist Union
- Relevant trade unions
- The police and other law enforcement agencies
- Auditors
- We will include your basic contact details in our internal online directory, though you can control how much information is accessible internally. You may also choose to make your details available externally.
- We may disclose your name if this appears in information to be disclosed in response to a Freedom of Information request.

In addition to the above, we may publish or disclose any personal information about you to external enquirers or organisations if you have requested it or consented to it, or if it is in your vital interests to do so (e.g. in an emergency situation).

13. International data transfer

Although most of the information we store and process stays within the UK, some information may be transferred to countries outside the European Economic Area (EEA). This may occur if, for example, one of our trusted partners' servers is located in a country outside the EEA. Where these countries do not have similar data protection laws to the UK, we will take steps to make sure they provide an adequate level of protection in accordance with UK data protection law.

14. How do we protect your personal information?

We are committed to holding your data securely and treating them with sensitivity. All data are held securely and in accordance with the Data Protection Act 1998. Your data are held on a database hosted on a secure server within the College's IT network, and also within paper files stored securely

We limit access to your personal information to those employees, 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.

Where we engage third parties to process personal data on our behalf, they do so on the basis of written instructions contained within a contract, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

We have put in place procedures to deal with any suspected data breach. If you suspect a data breach has occurred at the College, the organisation has a duty to report this to the Information Commissioners Office (ICO) within 72 hours. Please report suspected data breaches to the Data Protection Officer as soon as you can.

15. Your rights and who to contact

We will always try to ensure that the data we hold for you are up to date, reasonable and not excessive. In certain circumstances, by law you have the right to:

- Be informed as to how we use your data (via this Privacy Notice)
- Access or request a copy of the data we hold about you
- Update, amend or rectify the data we hold about you
- Change your communication preferences at any time to restrict how we process your data, or opt out of some or all communication from us
- Ask us to remove your data from our records
- Withdraw consent, where it is used as a legal basis for processing
- Object to or restrict the processing of your information for any of the purposes outlined above.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer.

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 such circumstances.

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.

If you have any questions about this Privacy Notice, your data rights, or would like to receive a copy of the information we hold about you, please contact:

Rev Helen Stokley
Data Protection Officer
Spurgeon's College
South Norwood Hill
London
SE25 6DJ
dpo@spurgeons.ac.uk +44 (0)20 8653 0850

If you feel that we have let you down in relation to your information rights then please contact us so that we can discuss this with you and rectify the situation.

You can also make complaints directly to the Information Commissioner's Office (ICO). The ICO is the independent authority upholding information rights for the UK. Their website is ico.org.uk and their telephone helpline number is 0303 123 1113.

From time to time, we may use your information for new purposes not currently described in this Privacy Notice. If our information practices change at some time in the future, we will always post the policy changes on this page.

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