

# Volunteer applicant privacy notice

Aspire Sussex Ltd is aware of its obligations under the General Data Protection Regulation (GDPR) and is committed to processing your data securely and transparently. This privacy notice sets out, in line with GDPR, the types of data that we hold on you as a Volunteer Applicant. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

## Data controller details

Aspire Sussex Ltd is a data controller, meaning that it determines the processes to be used when using your personal data. Our contact details are as follows: Aspire Sussex Ltd, Marle Place, Leylands Road, Burgess Hill, RH16 8HZ.

## Personal Data

Personal data is information relating to a living individual, from which that individual can be identified, or which can be used to identify a living individual in conjunction with other information held. It includes expressions or opinions about the individual or indication of intent towards an individual.

## Data protection principles

In relation to your personal data, we will:

- process it fairly, lawfully and in a clear, transparent way
- collect your data only for reasons that we find proper for the course of your volunteering in ways that have been explained to you
- only use it in the way that we have told you about
- ensure it is correct and up to date
- keep your data for only as long as we need it
- process it in a way that ensures it will not be used for anything that you are not aware of or have consented to (as appropriate)

## Types of data we collect/process and why we collect/process it

The law on data protection allows us to process your data for certain reasons only:

- in order for us to carry out our legitimate interests
- in order to carry out legally required duties
- in order to perform the employment contract that we are party to
- to protect your interests and
- where something is done in the public interest

All of the processing carried out by us falls into one of the permitted reasons set out above. Generally, we will rely on the first two reasons to process your data.

Data we collect	What we use it for
Your personal details including your name, address, email address, phone numbers	To contact you to discuss your volunteering application and volunteering opportunities
Information included on your application form or CV including references, education history and employment/volunteering history; key skills and reasons for applying	To build a picture of your skills, experience and interests in order to assess your suitability for volunteering opportunities
Notes made by our volunteer recruitment officers during the volunteer recruitment process	To assess your suitability for volunteering with us and your suitability for particular volunteering placements
References from previous or current employers, educational establishments or personal referees	To assess your suitability for volunteering with us and your suitability for particular volunteering placements
Information on special requirements, health or medical conditions	To assess your suitability for volunteering with us and your suitability for particular volunteering placements. To help determine any reasonable adjustments that might be needed to enable a disabled applicant to take part in the recruitment process.
Information related to your availability and the reasons for periods of unavailability	To assess your suitability for volunteering with us and your suitability for particular volunteering placements
Identity documents such as passport and birth certificate	To verify your identity and it is a requirement of some of our funders that we obtain this information.
Documentation to enable a DBS check to be carried out; DBS number and date	To satisfy the legal requirement to request DBS checks for those applying to work with children and where we are permitted and have a legitimate interest to apply for a DBS check for those applying to work with Vulnerable adults.

We have a legitimate interest in collecting and using your personal data for example in order to:

- assess you for volunteer placements and communicate with you about them
- assess your training needs to support your volunteering role

We need to collect your data to ensure we are complying with legal requirements such as:

- making reasonable adjustments for disabled volunteers applicants
- carrying out DBS checks (where required)

If you are unsuccessful in obtaining a volunteering placement with us, we may in some circumstances seek your consent to retaining your data in case other suitable placements arise in the Company for which we think you may wish to apply. You are free to withhold your consent to this and there will be no consequences for withholding consent.

If you are unsuccessful in obtaining a volunteering placement with us and we do not seek your consent to retain your data, your data will not be used for any reason other than in the ways explained above in relation to the specific application you have made.

### **How we collect your data**

We collect data about you in a variety of ways including the information you would normally include in a CV, application form or a volunteer application cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when you complete forms at the start of your employment, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving licence or passport.

In some cases, we will collect data about you from third parties, such as employment agencies or former employers/education providers when gathering references.

Your personal data may be collected on a paper or online form, by telephone, email or by a member of our staff and is kept within the Company's Applicant Tracking, HR and IT systems.

### **Special categories of data**

Special category data is categorised as data relating to the health; sex life; sexual orientation; race; ethnic origin; political opinion; religion or trade union membership of a person or genetic/biometric data about a person.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public

We will use your special category data in relation to race/ethnic origin and health:

- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments for disabled applicants

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn.

### **If you do not provide your data to us**

One of the reasons for processing your data is to allow us to carry out an effective recruitment process. Whilst you are under no obligation to provide us with your data, we may not be able to process, or continue with (as appropriate), your application.

### **Sharing your data**

Your data will be shared with colleagues within the Company where it is necessary for them to undertake their duties with regard to recruitment. This includes, for example, the HR department; members of staff responsible for screening your application and interviewing you; the IT department where you require access to our systems to undertake any assessments requiring IT equipment;

In some cases, we will collect data about you from third parties, such as volunteer bureaux/agencies.

Your data will be shared with third parties if you are successful in your job application. In these circumstances, we will share your data in order to obtain references as part of the recruitment process and to obtain a DBS check if required..

We do not share your data with bodies outside of the European Economic Area.

### **Protecting your data**

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such, details of which can be found in Aspire's IT Security Policy and Data Protection Policies.

Where we share your data with third parties, we provide written instructions to them to ensure that your data are held securely and in line with GDPR requirements.

Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

### **How long we keep your data for**

In line with data protection principles, we only keep your data for as long as we need it for and this will depend on whether or not you are successful in obtaining a volunteering placement with us.

If your application is not successful and we have not sought consent or you have not provided consent upon our request to keep your data for the purpose of future suitable volunteering vacancies, we will keep your data for 12 months once the recruitment exercise ends.

If we have sought your consent to keep your data on file for future volunteering vacancies, and you have provided consent, we will keep your data for 18 months once the recruitment exercise ends. At the end of this period, we will delete or destroy your data, unless you have already withdraw your consent to our processing of your data in which case it will be deleted or destroyed upon your withdrawal of consent.

If your application is successful, your data will be kept and transferred to the systems we administer for volunteers. We have a separate privacy notice for volunteers, which will be provided to you.

### **Automated decision making**

No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

### **Your rights in relation to your data**

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
- the right of access. You have the right to access the data that we hold on you. To do so, you should make a subject access request. You can read more about this in our Subject Access Request policy which is available from [data.controller@aspresussex.org.uk](mailto:data.controller@aspresussex.org.uk) or can be viewed on Moodle
- the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it

- the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
- the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
- the right to portability. You may transfer the data that we hold on you for your own purposes
- the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests
- the right to regulate any automated decision-making and profiling of personal data. You have a right not to be subject to automated decision making in way that adversely affects your legal rights.

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

If you wish to exercise any of the rights explained above, please contact [hr-team@aspireussex.org.uk](mailto:hr-team@aspireussex.org.uk)

### **Making a complaint**

The supervisory authority in the UK for data protection matters is the Information Commissioner (ICO). If you think your data protection rights have been breached in any way by us, you are able to make a complaint to the ICO.