



Recyke y'Bike Ltd
Volunteer Data Protection Policy and Privacy Notice

1. INTRODUCTION

This policy sets out information about the processing of volunteers' (including trustees') data, and how volunteers' (including trustees') privacy in relation to their data is protected. This policy does not confer any contractual rights.

A simplified Privacy Notice is set out at Appendix 1.

Recyke y'bike Ltd. is a registered charity, constituted as a company limited by guarantee. We are registered in the UK as Charity No. 1124639, and Company No. 5839547. Our website address is: <http://recyke-y-bike.org>, and also accessible via <http://www.recyke.bike>

2. OUR LEGAL OBLIGATIONS

Recyke y'bike must comply with the following obligations when processing your personal data:

- That your data is used lawfully, fairly, and in a transparent way
- That your data is collected only for valid purposes, which have been clearly explained to you
- That the data collected is relevant to the purposes Recyke y'bike has told you about, and limited only to those purposes
- That your data is accurate and up-to-date
- That your data is kept in a format which allows for you to be identified for only as long as necessary
- That your data is kept securely

3. WHAT DATA WE HOLD

The data we hold about you is set out in the table at Appendix 2.

4. WHY WE HOLD YOUR PERSONAL DATA

Recyke y'bike is a 'data controller' and needs to collect and hold data about volunteers to enable us to support your volunteering with us.

Recyke y'bike is allowed to hold and process data about you because you have consented to our doing so (see Volunteer Consent Form at Appendix 3. That consent is the main legal basis for processing your information.

Recyke y'bike is registered with the Information Commissioner's Office (ref. ZA478423).

5. HOW WE COLLECT YOUR PERSONAL DATA

Recyke y'bike collects your personal data by a variety of means.

At the recruitment stage, we will collect data through the application process and references.

At the induction stage, we will ask for contact details and medical and health data. After you have volunteered for 3 months, we will ask for DBS information.

We will hold key information about your volunteering for 12 months after you have left employment with Recyke y'bike for future reference purposes.

We will collect photographic/video images of you if you consent to our doing so (see Appendix 3.)

6. HOW WE USE YOUR PERSONAL DATA

Recyke y'bike will only generally use your personal data for one of the following lawful reasons:

- To support you in volunteering with Recyke y'bike
- To comply with legal obligations

With your consent, we will use your information for the following purposes:

- To publicise the work of Recyke y'bike
- To apply for grant funding
- To understand the diversity of our workforce

There are other rare occasions when your personal data or special category data will be used:

- Where we need to protect your interests, or someone else's interests
- Where it is needed in the public interest, or has already been made public
- Where Recyke y'bike has to process this data for legal claims

If Recyke y'bike considers that it is necessary to use your personal data for a different and unrelated purpose, you will be notified of this in writing with an explanation of the legal basis for doing so. There may be exceptional circumstances where Recyke y'bike has to process your data without your knowledge or consent where this is required by law.

7. HOW WE KEEP YOUR DATA

6.1 ACCURACY: Recyke y'bike will take reasonable steps to ensure personal data is accurate and up to date.

6.2 RETENTION: to ensure that personal data is kept for no longer than necessary, Recyke y'bike has in place a Records Retention Policy for each area in which personal data is processed and reviews this policy annually. The Records Retention Policy considers what data should/must be retained, for how long, and why.

6.3 SECURITY: Recyke y'bike will ensure that personal data is stored securely using modern software that is kept-up-to-date. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. Paper copies will be kept in a locked cupboard.

9.3 DELETION: when personal data is deleted this will be done safely such that the data is irrecoverable.

8. YOUR RIGHTS AND OBLIGATIONS

Recyke y'bike will only ask you to provide data which is necessary for the performance of your volunteering relationship, or any associated legal obligations. If you do not provide this data, Recyke y'bike may not be able to offer you the opportunity to volunteer with us and/or meet its legal obligations to you.

It is important that you inform us of any changes to your data so that we can make sure the information we hold is accurate.

You have the following rights in relation to your personal data:

- The right to request a copy of your personal data that Recyke y'bike holds about you
- The right to request that Recyke y'bike corrects any personal data if it is inaccurate or out of date
- The right to withdraw your consent to the processing at any time
- The right to request that Recyke y'bike provide you with your personal data and, where possible, transmit that data directly to another data controller
- The right, where there is a dispute about the accuracy or processing of your personal data, to request a restriction on further processing
- The right to lodge a complaint with the Information Commissioner's Office Rights in relation to automated decision-making and profiling.

9. SPECIAL CATEGORY DATA

Any personal data which identifies ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, genetic, biometric or health data, sex life and sexual orientation is passed as special category data. Recyke y'bike will only use this data

- To ensure Health and Safety compliance
- To assess your capability to perform, monitor and manage your sickness absence, provide appropriate workplace adjustments etc.
- Where it is needed in to promote equal opportunities, e.g. via an equal opportunity monitoring and reporting

In limited circumstances Recyke y'bike may request your written consent to allow us to process special category data (e.g. to obtain a medical report).

Recyke y'bike does not envisage that it will hold data about criminal convictions. Recyke y'bike will only collect data about criminal convictions if it is appropriate to the role and duties you will perform.

10. SUBJECT ACCESS REQUESTS

You are entitled to make a subject access request (SAR) for copies of any personal data Recyke y'bike holds about you.

Any request should be made in writing to the General Manager. You may (but do not have to use) the SAR request form at Appendix 4.

If you make an SAR, Recyke y'bike may ask you to confirm your identity so we can ensure that personal data is released to the correct person.

Recyke y'bike will reply to an SAR within 30 calendar days, and may extend this for particularly complex requests. Recyke y'bike may withhold personal data if disclosing it would adversely affect the rights and freedoms of others.

Recyke y'bike will only charge you a fee for an SAR if your request is manifestly unfounded or excessive, or if further copies of the same data are requested.

11. DATA BREACHES

Where any personal data is lost, destroyed, corrupted or disclosed, this will amount to a data breach.

If you become aware of a data breach, you must inform the General Manager immediately.

If a data breach occurs, Recyke y'bike will:

- Investigate the cause of the breach
- Take action to contain the breach
- Assess the likelihood and severity of risk to any of a data subject's rights

Where personal data has been sent to someone who is not authorised to have access to it, Recyke y'bike will:

- Inform the recipient not to distribute it in any way or discuss it with anyone else

- Inform the recipient to destroy or delete the data, and require them to confirm in writing that they have done so
- Where relevant, inform the data subject(s) so they can take any necessary action

If there is a risk to the individual(s) rights, Recyke y'bike will notify the ICO within 72 hours of becoming aware of the breach. If a risk is unlikely, there is no requirement on Recyke y'bike to report the data breach to the ICO.

Appendix 1: Protecting your data

Because you volunteer for us, we have to keep personal information and a record of the work you do with us.

There are strict rules about how we do this called the General Data Protection Regulations.

We make sure that we protect your data in these ways:

- We keep it up to date
- We store it securely
- We do not keep it any longer than reasonably necessary, and then destroy it securely
- We do not collect it unnecessarily
- We protect it from loss or misuse

We will not share any data without your permission unless you or another person is at risk of harm or we are required by law.

You have a right to access the records we keep about you.

Please ask us if you would like a full copy of our Data Protection Policy and Privacy Notice.

Appendix 2: Table of personal data (volunteers)

What information is collected?	What is the information used for?	Legal basis for processing	How is it held?	Who has access to it?	How is it updated?	How long do we keep it?
Recruitment data: skills and qualifications, references, application form	To allow Recycle y'bike to make a decision about suitability for engagement	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Shop Managers	Application form, references received, interview	Duration of volunteering and 12 months afterwards
Induction data: key personal data, including name, address, email address, phone numbers, date of birth, next of kin	To allow us to send correspondence to volunteers, and contact next of kin in an emergency	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Shop Managers, Office staff	When volunteers join Recycle y'bike	Duration of volunteering and 12 months afterwards
DBS certificate dates and numbers	To comply with safeguarding obligations	Legitimate interest	Google Drive	Trustees, General Manager, Office staff	When a volunteer has volunteered regularly for 3 months, and every 3 years thereafter	Duration of volunteering and 2 years afterwards
Time and attendance data: timesheets	To monitor the contribution of volunteers, generally and individually to Recycle y'bike	Consent	Google Drive and paper (in locked cabinet): current monthly timesheet is available to all staff and volunteers	Trustees, General Manager, Shop Managers, Office staff. Current monthly sign-in sheet accessible by all volunteers and staff.	By volunteer each day they volunteer	Duration of volunteering and 12 months afterwards

Health and medical data: data about health, medical conditions. Consent may also be sought to gain a report from volunteers' GP, consultant or occupational health specialist.	To understand details about volunteers' health/medical conditions in relation to their work and ability to undertake their role, or alternative roles, We would only seek this information with volunteers' specific consent.	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Shop Managers, Office staff	When volunteers join Recycle y'bike, in the event of sickness absence, or if medical details change	Duration of volunteering and 12 months afterwards
Accident book entries	To comply with legal obligations	Legitimate interest, consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Office staff	In the event of an accident/incident	3 years from the date of the accident
Monitoring data: data relating to racial origin, religion, sex, sexual orientation etc. that are classed as protected characteristics under the Equality Act 2010	To understand the diversity of our workforce	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Office staff	When volunteers join Recycle y'bike or when requested	Anonymised data retained indefinitely
Other data: start date, location of workplace, driving licence details (if applicable), training records, professional	We may need to understand details about work performance, training needs, policy compliance etc or	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Shop Managers, Office staff	When volunteers join Recycle y'bike, and at periodic reviews thereafter	Duration of volunteering and 12 months afterwards

Memberships, performance details, reviews	making decisions about continued volunteering					
Future reference data (after you have left Recycle y'bike): key data items including name, address, start and leave dates, volunteering undertaken, training courses attended etc.	We keep a small amount of basic data about employees after they have left to allow us to give a reference to a prospective employer.	Consent	Google Drive and paper (in locked cabinet)	Trustees, General Manager, Shop Managers, Office staff	When volunteers leave Recycle y'bike	Duration of volunteering and 5 years afterwards.
Photographs/film records	To publicise the work of Recycle y'bike and apply for grant funding. We would only obtain and hold this information with volunteers' specific consent.	Consent	Google Drive	Trustees, General Manager, all staff, members of the public	N/A	Permanently
CCTV recording	To prevent and detect crime, and protect staff, volunteers and customers	Legitimate interest	CCTV system	Trustees, General Manager, Office staff		

Appendix 3: Volunteer Consent Form

Recyke y'bike

Name	
Date	
<p>I give permission for Recyke y'bike to keep records relating to my volunteering, including:</p> <ul style="list-style-type: none">- Application information- Contact details- Details for next of kin- Start date and attendance (sign-in sheets)- DBS certificate number and dates- Health information- Monitoring information (e.g. racial origin, religion, sex, sexual orientation etc)- Training courses undertaken- Driving licence (if relevant)- CCTV recordings <p>This data will be managed in accordance with the Data Protection Act 2018 and the General Data Protection Regulations.</p>	<input type="checkbox"/>
<p>I consent to Recyke y'bike using photographs and/or video recordings including images of me both internally and externally to promote the charity. These images could be used in print and digital media formats including print publications, websites, e-marketing, posters banners, advertising, film, social media, teaching and research purposes.</p> <p>I understand that images on websites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as EU/UK legislation provides.</p> <p>I understand that some images or recordings may be kept permanently once they are published and be kept as an archive of Recyke y'bike.</p>	<input type="checkbox"/>
<p>I give permission to be contacted from time to time for feedback, or let me know about Recyke y'bike events or activities.</p>	<input type="checkbox"/>

Please note that we will never share your information with other organisations for marketing purposes.

I understand that I have the right to make a Subject Access Request for the information that Recyke y'bike holds about me.

Appendix 4: Subject Access Request Form

Recyke y'bike

Subject Access Request (General Data Protection Regulations 2018)

You are entitled to see most of the information we hold about you. If you want to see it, please fill in this form and hand it to the General Manager.

Your name	
Your address	
Your phone number (if you wish)	
Your email address (if you wish)	
Please tick if you have ever been:	
<input type="checkbox"/> an employee	
<input type="checkbox"/> a volunteer (including trustee)	
<input type="checkbox"/> a customer or user of our services	
<input type="checkbox"/> other	
If you have ticked 'other', please tell us why you think we might have information about you:	
If we may have known you under a different name, please tell us here:	
If you are only interested in particular information, please say what it is:	
I want to see the records you hold on me.	
Signed:	
Dated:	