

## **External Volunteers Privacy Notice**

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This notice describes how the City of London Corporation (“the City Corporation”) as a data controller collects and uses personal information about you during and after your time/role as a volunteer, in accordance with the United Kingdom’s General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018). The Notice will be reviewed periodically and may be updated at any time.

This Notice applies to current and former volunteers.

The City Corporation’s Data Protection Officer is the Comptroller and City Solicitor and can be contacted at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

### **The 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 identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

Examples of the categories of personal information we will collect, store and use about you include:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- Information such as start date, volunteering hours, volunteer title, volunteer roles,
- Location of volunteering.
- Copy of driving license (if required)
- Recruitment information (including copies of references, documents verifying identity/qualifications and other information

included in an application form, CV or covering letter or as part of the application process)

- Performance information
- Information obtained through electronic means such as ID card (if applicable)
- Information about your use of our information and communications systems
- Photographs
- Bank details

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

- Information about your race or ethnicity, religious/philosophical beliefs, sexual orientation and political opinions
- Information about your health, including any medical condition, health and sickness records, and disability
- Information about criminal convictions and offences, or related security measures for specific roles, such as, Disclosure and Barring Service (DBS) checks
- Data for monitoring and reporting purposes such as equalities data reporting to demonstrate compliance with The Public Sector Equality Duty (PSED). Reporting activities using this data will be undertaken in an anonymised manner.

### **Why we collect and use this information**

- To make a decision about your recruitment and confirm your suitability for the voluntary role
- To make decisions about continued volunteering
- To manage performance
- To make arrangements for leaving a voluntary role
- To ensure a consistently positive experience for volunteers whatever their role, task or area. This could include activities such as: sending proactive communications to volunteers or providing support with personal development.
- To inform the development of volunteer recruitment, management, and retention policies
- To comply with health and safety obligations
- To reimburse expenses.

### **The lawful basis on which we process this information**

Your personal data will be processed only when there is a legal basis to do so.

Processing of your personal data will only take place in one or more of the following

circumstances:

1. Where we need to comply with a legal obligation.
2. Where it is necessary in the public interest.
3. Where point 2 does not apply, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
4. Where we need to protect your interests (or someone else's interests).
5. In limited circumstances, with your explicit written consent.

The legal basis for collecting special categories of data, include the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring, and in line with our data protection policy.
4. Where it is needed to assess your volunteering capacity on health grounds, subject to appropriate confidentiality safeguards.

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.

## **Consent**

If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time by contacting the Information Compliance Team.

## **Collecting this information**

Whilst the majority of information you provide is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

We do not collect more information than we need to fulfil our stated purposes and will not

retain it for longer than is necessary. It is noted that all staff members with access to the data provided receive mandatory training in data protection.

### **Storing and retaining this information**

Personal and special category data will be stored within the servers hosted by the City of London and used by the relevant department for your voluntary role.

We hold your personal data for a reasonable period in accordance with legal requirements after you have finished volunteering with us.

### **Sharing this information**

We share information about volunteers with internal departments for the purpose of internal reporting. As noted, when reporting occurs all reports will be anonymised of personal data.

In addition, your data may be shared with external third parties, for the purpose of research and analysis of the volunteering experience, or part of projects undertaken to improve our services and to inform the activities of the wider voluntary sector.

Furthermore, your data may also be shared with external agencies only when necessary and where the law and our policies permit us to do so, for example for the prevention or detection of crime.

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

### **International data transfers**

Volunteer related personal data held directly by the City Corporation is not routinely transferred to countries outside the UK. However, certain data processed by third parties on behalf of the City Corporation may be transferred, for instance organisations based outside the UK or operating on a global basis may need to transfer or store your data outside the UK. We will put in place additional protections on your personal information if it leaves the UK ranging from secure way of transferring data to ensuring we have a robust contract in place with that third party. Links to each organisation's privacy notice will also be supplied where this occurs.

### **Your rights regarding your personal information**

Under data protection legislation, you have the right to request access to information about  
External Volunteer Privacy Notice  
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you that we hold, also known as a Subject Access Request. You will not have to pay a fee to access your personal information (or to exercise any of the other rights listed below). 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.

To make a Subject Access Request or to 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 Information Compliance Team at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk) who will refer your request to the relevant departmental AIN representatives. Refer to the Data Subject Rights' Policy for further information.

You also have the right to:

- 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.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. This should be addressed to: Information Compliance Team, Comptroller and City Solicitor's Department, City of London, PO Box 270, Guildhall, London, EC2P 2EJ, UK; or email [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

### **Further information**

If you would like to discuss anything in this privacy notice, please contact the City Corporation's Data Protection Officer at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk).

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit [ico.org.uk](https://ico.org.uk) or email [casework@ico.org.uk](mailto:casework@ico.org.uk).

#### Appendix/Further reading

- [Data Subject Rights Policy](#)