



Privacy Notice for Volunteers

Introduction

The Trust collects and processes personal data relating its volunteers to manage the volunteer relationship and to enable the Trust to provide a volunteer service.

Who are we?

The Shrewsbury and Telford Hospital NHS Trust is a public organisation providing acute medical services.

The Trust is registered with the Information Commissioner's Office (Registration Number **Z8157295**)

Our name, address and contact details are:

The Shrewsbury and Telford Hospital NHS Trust
Mytton Oak Road
Shrewsbury
Shropshire
SY3 8XQ
Tel: 01743 261000
<https://www.sath.nhs.uk/>

Why do we collect information about you?

The Trust needs to process data to enter into a volunteer agreement with you and to meet its obligations under your volunteer placement. For example, it needs to process your data to provide you with a volunteer placement and to pay expenses claims.

In some cases, the Trust needs to process data to ensure that it is complying with its legal obligations. For example, it is required to comply with health and safety. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the Trust has a legitimate interest in processing personal data before, during and after the end of the volunteer relationship.

Processing volunteer data allows the Trust to;

- run recruitment and promotion processes;
- maintain accurate and up-to-date volunteer records and contact details including details of who to contact in the event of an emergency;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the Trust;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities and meet its obligations under health and safety law
- ensure effective general HR, Workforce and business administration;
- provide references on request for current or former volunteers;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the Trust relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of volunteers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed in relation to volunteers with disabilities and for health and safety purposes.

Where the Trust processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring and will be in accordance with GDPR compliance.

Data is stored in a range of different places, including in your volunteer file, in the Trust's management systems, our external volunteer management system (MES/Better Impact) and in other IT systems including the Trust's email system.

What if you do not provide personal data?

You have obligations under your Volunteer agreement and the required recruitment checks to volunteer too provide the Trust with data. In particular, you may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the Trust with data in order to exercise your statutory rights. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the Trust to enter a volunteer agreement with you. If you do not provide other information, this will hinder the Trust's ability to administer the rights and obligations arising as a result of the volunteer relationship efficiently.

What type of information do we use?

Personal data means any information relating to an identified or identifiable individual; an identifiable person is one who can be identified directly or indirectly.

Special category data means any information relating to racial or ethnic origin, political opinions, religious beliefs, trade union activities, physical or mental health, sexual life or details of criminal offences.

The Trust collects and processes a range of information about you and this includes;

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your volunteer placement;
- details of your, skills and experience;
- national insurance number;
- details of your bank account (if claiming expenses)
- information about your emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record;
- details of your schedule (days and hours of volunteering placement) and attendance;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;
- information about medical or health conditions (including an Occupational Health Questionnaire and a COVID risk assessment), including whether or not you have a disability for which the Trust needs to make reasonable adjustments;
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Trust collects this information in a variety of ways. For example, data is collected through application forms, obtained from your passport or other identity documents such as your driving licence; from correspondence with you; or through interviews, or meetings.

In some cases, the Trust collects personal data about you from third parties, such as personal, professional or academic references and information from criminal records checks permitted by law.

What do we use your information for?

We only use your information for volunteering purposes. The main circumstances for using your data are as follows:

- To process your volunteer application including references, occupational health clearance, DBS checks and elearning

- To contact you about volunteer placements, training and send you up-to-date information about volunteering and events at the Trust
- To keep a record of your volunteer activity
- To record training needs
- To use your image or stories on our website, social media platforms or press releases
- maintain accurate and up-to-date volunteer records and contact details including details of who to contact in the event of an emergency;
- To monitor conduct and performance and to undertake procedures with regard to these if the need arises
- To comply with a legal or regulatory obligations.

With whom do we share your information?

Relevant information will be shared outside of the Public Participation Team, and will include other internal teams at the Trust, including HR, Workforce and the recruitment team (including payroll), your department or ward manager, and IT staff if access to the data is necessary.

The Trust shares your data with third parties in order to obtain pre-volunteering references and obtain necessary criminal records checks from the Disclosure and Barring Service.

The Trust also shares your data with third parties that process data on its behalf for the provision of occupational health services.

Data will be shared with the supplier of our volunteer management system in order to support us to process data and manage the volunteer process.

How long do we keep your personal information for?

The NHS has a comprehensive set of guidelines, which govern the length of time that we may keep your records for, which are called NHS Retention Schedules – available in the Records Management NHS Code of Practice. The Shrewsbury and Telford Hospital NHS Trust will comply with the NHS Retention Schedules.

There may be occasions where the Trust will be obliged to vary from the NHS Retention Schedules, for example, in response to a Court Order or other equivalent legal requirement.

Information about the NHS Retention Schedules may be found via the NHS Digital web at: <https://digital.nhs.uk/data-and-information/looking-after-information/data-security-and-information-governance/codes-of-practice-for-handling-information-in-health-and-care/records-management-code-of-practice-for-health-and-social-care-2016>

What measures do we take to protect your information?

We take our duty to protect your personal information and confidentiality seriously. We are committed to taking all reasonable measures to ensure the confidentiality and security of personal data for which we are responsible, whether computerised or on paper.

The Trust has a Senior Risk Owner (SIRO), a Caldicott Guardian and a Data Protection Officer who between them are responsible for the management of personal and special information and confidentiality.

We have access control systems in place to allow only those that have a legitimate reason to access your information and systems and processes to verify who has accessed your records.

Under the NHS Confidentiality Code of Conduct, all our staff are also required to protect information, and inform you of how your information will be used.

All Trust staff complete annual mandatory training in Data Security and Data Protection.

Everyone working for the NHS is subject to the common law duty of confidentiality. Information provided in confidence will only be used for the purpose advised or consented to by the service user, unless it is required or permitted by the law.

Where the Trust engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical measures to ensure the security of data.

What are your rights in relation to your personal information?

Unless subject to an exemption, you have the following rights with respect to your personal data:

- The right request a copy of your personal data which the Shrewsbury and Telford Hospital NHS Trust holds about you
- The right to request that Shrewsbury and Telford Hospital NHS Trust corrects any data if it is found to be inaccurate or out of date
- The right to request your personal data is erased where it is no longer necessary for the Shrewsbury and Telford Hospital NHS Trust to retain such information
- The right to withdraw your consent to the processing at any time if you have previously given consent for processing
- The right to request that the Shrewsbury and Telford Hospital NHS Trust provide you with your personal information and where possible, to transmit that data directly to another data controller, where your information has been processed with your consent
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing

- The right to object to the processing of your data
- The right to lodge a complaint with the Information Commissioner's Office.

For further information about your rights this can be found at: <https://ico.org.uk/>

If you would like to exercise any of these rights, please contact the Data Protection and Information Governance Office via telephone: 01952 641222 e-mail: sath.informationgovernance@nhs.net.

If you believe that the Trust has not complied with your data protection rights, you can complain to the Information Commissioner.

What happens if we need to transfer your information abroad?

The Shrewsbury and Telford Hospital NHS Trust do not routinely transfer information outside the European Economic Area but if there is a need to do so we will ensure that the security and protections that are put in place are of the equivalent standards to those standards that we would use internally when processing your information.

Your data may be transferred to countries outside the European Economic Area (EEA). For example, when a request for a volunteer reference is made by an organisation outside of the EEA.

What if we wish to use your information for another purpose?

If we wish to use your personal information for a new purpose, not covered by this Privacy Notice, then we will provide you with a new notice explaining the new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we ensure there is a legal basis/justification for such processing.

Where the Shrewsbury and Telford Hospital NHS Trust wish to use your information that is for any reason not in line with administering the business of the Shrewsbury and Telford Hospital NHS Trust or complying with a legal obligation then we will seek your consent to do so.