Volunteering Candidates Privacy Notice

This notice explains how and why The Connection at St Martin-in-the-Fields uses your personal information during the recruitment process. This policy applies to all potential volunteers, who are going through the recruitment process. Please read it carefully to understand our practices regarding your personal information and how we will treat it. A further Volunteers Privacy Notice will be provided to successful applicants.

When we refer to “we” or “us” in this document we are referring to The Connection at St Martin-in-the-Fields. We are listed on the Information Commissioner’s register of data controllers under Registration Number Z7919091.

When we use the term **personal information** we mean any information that relates to you from which you can be identified. This might include your name, your home address, your personal email contact details, or your telephone number. Personal information does not include information where it is not possible to identify you (i.e. anonymous data).

We use the term **special categories of personal information** to mean information about your race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health and sexual orientation.

This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical. For the purposes of the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and any applicable replacement legislation, we are the data controller.

## Why we collect and use information about you

The majority of information we collect comes directly from you. There are some situations, where we collect it from different sources. These include:

* The Disclosure and Barring Service, where we obtain information about your criminal history;
* Persons providing you with a reference.

Below is the list of the types of information we collect about you and the reasons why we do it:

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| **Data Collected** | **Purposes** |
| Contact information, including your name, address, telephone number and email address. | To contact you to discuss volunteering with the Connection at St Martin’s. |
| Information about your skills, experience and interests. | To assess your suitability for volunteering opportunities. |
| Criminal Conviction(s) | For some roles, we are obliged to seek information about criminal convictions and offences. Where we do it, it is because it is necessary for us to carry out our obligations and exercise specific rights in relation to safeguarding. This check will only be completed in the following circumstances:   * If the role is a regulated activity within the meaning of the Safeguarding Vulnerable Groups Act 2006. * If we are legally required by the Charity Commission to carry out criminal records checks for those carrying out the role. * If the volunteering role requires a high degree of trust and integrity and we would like to ask you to seek an enhanced disclosure of your criminal records history. |
| Information about your race or ethnicity, religious beliefs, lived experience of homelessness and sexual orientation collected as an optional question only. | For equality and diversity monitoring. |
| Information about your health, including any medical condition. | To comply with our health & safety obligations and enable any reasonable adjustments to be made. |
| References | To contact your reference providers in order to confirm your ID and assess your suitability to volunteer with us. |

## The lawful grounds on which we use information about you

We will only use your personal information when the law allows us to. We process your personal information for the above purposes relying on one or more of the following lawful grounds:

* 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. In broad terms our legitimate interest is fulfilling the charitable purpose of CSTM, which involves contacting our volunteers to plan and administrate activities, taking steps to ensure and monitor compliance with our legal obligations and internal standards and procedures, assessing suitability of volunteers for potential roles and keeping records of volunteer activities and performance.
* Where it is necessary for us to comply with a legal obligation, e.g. compliance with Health and Safety or Safeguarding legislation.
* Where you have consented; for example, to us using your image in our fundraising materials.
* Where it is necessary to protect your vital interests or those of others.

When we process your special category and criminal offence data we do it:

* Where you have consented to the processing for a specific purpose
* In order to comply with a legal obligation; or
* It’s necessary to protect your vital interests (or those of someone else) in an emergency
* We have a need to use such information in connection with a legal claim
* It is necessary in public interest; for example, safeguarding adults and children.

## Who has access to your information

Your information will be shared internally with people involved with recruiting volunteers. This includes members of the Recovery and Opportunities Team, staff involved in the volunteer interview process, internal and external IT systems support staff. They will only be able to access the information that is necessary for the performance of their roles.

## How long do we hold on to your information?

If your application is unsuccessful, the organisation will keep your personal data on file for a minimum period of 1 year and then this will be securely destroyed. If your application to volunteer is successful, personal data gathered during the recruitment process will be transferred to your volunteering file. All information in this file is retained during the time you are volunteering with us and for seven years after.

Where we hold your data based on consent, we will delete it upon request.

These retention periods may be extended or reduced if required by applicable law or we deem it necessary, for example, to defend legal proceedings or if there is an on-going investigation relating to the information. We review the personal data (and the categories of personal data) we hold on a regular basis to ensure the data we are holding is still required and is accurate. If we discover that certain data we are holding is no longer necessary or accurate, we will take steps to correct or delete the data.

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 and share such information without further notice to you.

We only keep your personal information in a secure environment. Personal Data will only be used as set out in this notice.

## International transfers

When you use the forms embedded in the CSTM website to submit your volunteering application, your information will be sent outside of the UK and the EU, including to the US, by Wufoo, the provider of the online forms. To find out more about the safeguards for these transfers, as well as how your information is processed, please see [Wufoo’s Privacy Notice](https://www.surveymonkey.com/mp/legal/privacy). If you prefer to avoid your information being transferred outside of the UK and the EU, please use the Word version of the form instead.

## Your rights as a Data Subject

The Data Protection legislation specifies the rights you have in relation to the information we process about you. Below is the information what they are and how to exercise them.

* **Right of Access** – we have an obligation to provide you with a copy of your information if you request it.
* If the information we hold about you is incorrect, you have the right to have it **corrected.**
* In some circumstances you have the right to have your information **deleted** – this right applies only when we do not have a good reason for keeping information about you, for example where we rely on your consent to keep it and you have withdrawn the consent.
* You can **object** to us using your personal information to further our legitimate interests (or those of a third party) or where we are using your personal information for direct marketing purposes.
* You can ask us to **restrict** or suspend the use of your personal information, for example, if you want us to establish its accuracy or our reasons for using it.
* Ask us to **transfer** your personal information to another person or organisation.
* If you have given us consent for processing your information, you can **withdraw this consent** at any time.

To make a request in relation to any of the above rights or to withdraw your consent, please speak to your supervisor, the Volunteers Coordinator, call us on 02077665544 or email data.protection@cstm.org.uk.

## Queries and Complaints

If you have any questions about this privacy policy or how we handle your personal information, please contact your supervisor, the Volunteer Coordinator, call us on 02077665544 or email data.protection@cstm.org.uk. If you are not happy with our response, you can make a complaint to the Information Commissioner’s Office (ICO), the UK supervisory authority for data protection issues.