



Privacy Policy – Volunteers

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1. What is the purpose of this document?

Guide Dogs is a working name of The Guide Dogs for the Blind Association.

Registered Office: Hillfields, Burghfield Common, Reading, Berkshire RG7 3YG. A company limited by guarantee registered in England and Wales (291646) and a charity registered in England and Wales (209617) and Scotland (SC038979)

Tel: 0118 983 5555 Email: guidedogs@guidedogs.org.uk
Website: www.guidedogs.org.uk

This privacy policy describes how we collect and use personal information about you during and after your volunteering relationship with us, in accordance with the General Data Protection Regulation (GDPR). It applies to all current and former volunteers.

Guide Dogs is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

Our Data Protection Officer is Phillippa T. Caine.

2. Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.



- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

3. The kind of information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified, whether directly or indirectly. 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.

We will collect, store, and use the following categories of personal information about you:

Table showing information collected

Please note the table below contains 3 columns and 10 rows.

Data Collected	What we use it for	Legal basis
Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses	To contact the volunteer	Legitimate Interests
Name, Email address Mobile no.	To send e-newsletter and marketing communications	Consent
Name Postal address Telephone	To send marketing communications	Legitimate Interests



Data Collected	What we use it for	Legal basis
Date of birth	To check volunteer not under 16. To review the effectiveness of marketing and campaign materials	Legitimate interest
Emergency contact information.	To contact someone in case of emergency	Legitimate Interests
Recruitment information (references and other information collected as part of the application process)	Making a decision about your recruitment as a volunteer.	Legitimate Interests
Information about any criminal convictions and offences as part of the recruitment process (collected on application form)	Making a decision about your recruitment as a volunteer for the role you have applied for.	Legitimate interests
Performance information	To provide a reference if requested. As supplementary evidence if a complaint is received.	Legitimate Interests
Information about your race or ethnicity, religious beliefs.	To monitor our diversity and inclusion processes	Consent



Data Collected	What we use it for	Legal basis
Information about your health, including any medical condition	To comply with our health & safety obligations and enable any reasonable adjustments to be made	Consent

4. How is your personal information collected?

We collect personal information about volunteers through the application and recruitment process, directly from candidates. We may sometimes collect additional information from third parties, including former employers, or when we need to carry out a DBS check if your role is a regulated activity.

We will collect additional personal information in the course of activities throughout the period of you volunteering for us.

5. How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- 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. The legitimate interest we rely on is to fulfil the charitable purpose of Guide Dogs.

We may also use your personal information in the following situations, which are likely to be rare:



- Where we need to protect your interests (or someone else's interests).
- Where it is needed in the public interest or for official purposes.

6. If you fail to provide personal information

If you fail to provide certain information when requested, we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers and volunteers).

7. Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

8. How we use particularly sensitive personal information

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to comply with our legal obligations.
- Where it is needed to assess your volunteering capacity on health grounds, subject to appropriate confidentiality safeguards.



9. Our obligations as a workplace provider

Where you have provided us with your particularly sensitive personal information, we will use it in the following ways:

- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work and to provide appropriate workplace adjustments.

10. Information about criminal convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our employee and volunteer data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary to protect your vital interests and you are not capable of giving your consent.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so. We will use information about criminal convictions and offences as part of the recruitment process to assess whether you can work in any of our workplaces that have vulnerable people.

We are allowed to use your personal information in this way to carry out our obligations

11. Automated decision making

We do not envisage that any decisions will be taken about you using automated means, however we will notify you in writing if this position changes.

12. Data security

We have put in place appropriate technical and organisational measures to protect the security of your information. Details of these measures are available upon request.



We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those volunteers, employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

13. Data retention

How long will you use my information for?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our **Data Retention policy** which is available from your Manager. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

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 such information without further notice to you. Once you are no longer a volunteer for the Charity we will retain and securely destroy your personal information in accordance with our data retention policy.



14. Rights of access, correction, erasure, and restriction

Your duty to inform us of changes

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **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 want to review, 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 our Data Protection Officer by email at dataprotectionofficer@guidedogs.org.uk or in writing to Data Protection Officer, Hillfields, Burghfield Common, Reading, Berkshire RG7 3YG

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). 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.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the Data Protection Officer in writing at the address below or by email at dataprotectionofficer@guidedogs.org.uk Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

15. Data protection officer

The Data Protection Officer oversees compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the Data Protection Officer. You have the right to make a complaint at any time to the



Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

16. Changes to this privacy notice

This privacy policy may change from time to time, for example to reflect new legal requirements. If it changes we will place an updated version on this page. Please review this page regularly to keep up-to-date with any changes to the Privacy Policy.

If you have any questions regarding our Privacy Policy, please write to our Data Protection Officer at:

Guide Dogs
Hillfields
Burghfield Common
Reading
Berkshire RG7 3YG

Email: dataprotectionofficer@guidedogs.org.uk

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