

National Museum of the Royal Navy

Data Protection: Privacy Notice for Volunteers

1 Why do we have this Notice?

The Museum is a **data controller** and is responsible for processing personal information about you. We are committed to complying with data protection law and protecting the privacy and security of your personal information. This Notice describes how and why we collect and use personal information about you during and after your working relationship with us and you should read this carefully to understand how we handle your personal information.

If you have any questions about this policy, please contact our designated member of staff responsible for data protection Sarah Dennis, Executive Director of Resources at governance@NMRN.org.uk

This Notice, which applies to current and former volunteers, does not form part of any volunteer agreement we have with you and the Museum reserves the right to change its terms at any time.

2 What information might we hold about you?

Personal data, or personal information, means any information about an individual from which that person can be identified. We may collect, store, and use some or all of the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Marital status.
- Next of kin and emergency contact information.
- Bank account details.
- Start date.
- Location of workplace.
- Recruitment information (including information about your entitlement to work in the UK including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Volunteer records (including job title, volunteer history, volunteer hours, training records and professional memberships).
- Performance information.
- CCTV footage.

- Information about your use of our information and communications systems.
- Photographs.

We may also collect, store and use the following special categories of more sensitive personal information (Special Categories):

- Information about your race or ethnicity, religious beliefs, sexual orientation or political opinions.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

3 How is this information collected?

We collect personal information about you through the application and recruitment process, either directly from you or sometimes from a volunteering agency. We may sometimes collect additional information from third parties including former employers or organisations previously volunteered for.

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

4 How do we use this information?

4.1 Our legal bases for using your personal information

We need the categories of information in the list above (at paragraph 2) to allow us to:

- perform our agreement with you; and
- to enable us to comply with legal obligations; and
- In some cases, we may use your personal information to pursue legitimate interests of our own or third parties.

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.

4.2 How we may use your personal information

The types of situations in which we may process your personal information are listed below:

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK.
- Administering the agreement we have entered into with you.
- Business management and planning, including accounting and auditing.

- Conducting performance reviews, managing performance and determining performance requirements.
- Assessing qualifications for a particular job or task.
- Making decisions about your continued engagement.
- Making arrangements for the termination of our working relationship.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work.
- Managing sickness absence/health.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.
- To conduct data analytics studies to review and better understand volunteer retention and attrition rates.
- Equal opportunities monitoring.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

5 Special Categories of personal information

5.1 When we can use it

Special Categories (see paragraph 2 above) of personal information require higher levels of protection. We may process such information in the following circumstances:

- In limited circumstances, with your explicit written consent.
- Where we need to carry out our legal obligations and in line with our employment or data protection policies.
- Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our employment or data protection policies.
- Where it is needed to assess your working 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 (such as a medical emergency), or where you have already made the information public.

5.2 How we may use it

We may use Special Categories of personal information in the following ways:

- We may 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, to provide appropriate workplace adjustments, to monitor and manage sickness absence.
- We may use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

6 Consent

We do not need your consent to process where we have another legal basis to do so as set out above. However, if we do need to seek your consent to processing, we will provide you with full details of the information that we would like and the reason we need it, so that you can carefully consider whether you wish to consent.

You should be aware that it is not a condition of your agreement with us that you agree to any request for consent from us and, where you have given consent, this can be withdrawn at any time by contacting the designated staff member or Volunteer Coordinators volunteering@NMRN.org.uk

7 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 where an enhanced DBS or Access NI check is required for the purposes of safeguarding vulnerable people (children and vulnerable adults) and provided we do so in line with our DBS and Access NI Checks Policy which is available on Workplace (our Intranet), the shared drive (NMRN Policies/HR Policies) and located in the staff room.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary 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.

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. Where appropriate, we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of you working for us. We will use information about criminal convictions and offences in the following ways:

- To undertake a risk assessment in relation to safeguarding vulnerable people (children and vulnerable adults).

8 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.

9 Data Sharing

9.1 Why might you share my personal information with third parties?

We may have to share your data with third parties, (including third-party service providers and other entities in the group) where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.

If we do share data, we require third parties to take appropriate security measures and only process your data for specified purposes.

9.2 Which third-party service providers process my personal information?

“Third parties” includes third-party service providers (including contractors and designated agents) and other entities within our group. The following activities are carried out by third-party service providers: IT services, Finance services and Volunteering services.

10 Data Security

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. We also have 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.

11 Data Retention

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 Document Retention Guidelines which is available on Workplace (the intranet), the shared drive (NMRN Policies/Data Protection Policies) and located in the staff room.

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.

12 Rights of access, correction, erasure, and restriction

12.1 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.

12.2 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.
- **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.
- **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.

12.3 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.

12.4 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.

13 Further questions or complaints

If you have any questions about this privacy notice or how we handle your personal information, please contact the designated staff member or the Volunteer Coordinators. 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.

14 Changes to this Privacy Notice

We reserve the right to update this Privacy Notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.