



## Privacy Policy

This document sets out the details of the privacy policy of High Peak CVS for employees, members and volunteers who are not members of the organisation.

### What information do we collect about you and why

We collect personal information that you may supply on our website, social media, membership applications, employment records and associated documents and if you intend to volunteer with us, on various volunteer agreement forms.

You might also engage with us as a member of the public, partner or another reason outside of our membership

The information we might ask you to provide may include:

- Your name, title and address including post-code, & gender
- Your telephone numbers and/or email addresses
- Bank card or other payment details if appropriate
- Bank sort code and account number for payroll purposes, along with National Insurance number for Tax reasons
- Gift Aid status
- Details of 'Next of kin' to contact in an emergency
- Details of work experience, skills, qualifications and previous employment
- On an offer of employment we may ask for references from your referees
- Previous volunteer experience and interests
- Details of medical situations (especially for Traffic), disabilities and support needs (including Special Dietary requirements)

### What we do with your information

We only use the information for the purpose it is given and nothing else. It is retained for only the minimum period of time appropriate to the circumstance. This is set out in the data retention policy, which can be found at the end of this document.

As members of High Peak CVS we will send you communications routinely such as E-Newsletters, Emails and other notices and advices associated with membership and the activities of the organisation and our partners. This is called implied consent. We will not

send you anything else, for example marketing material not associated with the CVS and our partners and our activities unless you have asked for it.

*You can opt out of any or all of our communications at any point simply by contacting us at:*

High Peak CVS  
Dunbar House, 105 Buxton Road  
Whaley Bridge, High Peak  
SK23 7HX  
Email: [hello@highpeakcvs.org.uk](mailto:hello@highpeakcvs.org.uk)

There are some membership, employment and donation communications that we are required or may be required to send (by physical post) regardless of your contact preferences. These are essential communications deemed necessary to fulfil our contractual obligations to you. This would include (as members):

- Any specific issues arising from the payment of your membership fee or related Gift Aid instruction

(as employees)

- Written notices of pay related communications, for example pay rise, or changes to pay policy, redundancy, liquidation/administration
- Necessary notices or communications about your contract and the contract of employment itself
- Written notices of disciplinary related activities

(as employees and volunteers)

- Other urgent notices deemed necessary for the safe execution of your duties, for example urgent notices about Health and Safety, security, or notices to inform the workforce that the site is closing, warnings of dangerous occurrences or events etc.

Often these will be handed to you in person on site or emailed to your work email address.

As members, employees and volunteers you will receive regular communications by email, verbal and face-to-face that relate to your membership, employment, duties and activities. These may include instructions or information.

Data about volunteers and members will be kept on a membership and volunteer database where access is restricted.

### Specific areas we may ask for your personal data and why

*Payroll and expenses claims:* for employees in order to pay your salary or wages due under contract we will require your bank details and National Insurance number (for

tax). Bank details are also used to process expenses claims. You may as a volunteer offer these details voluntarily in order to be reimbursed for an expense incurred as a volunteer (for example a purchase or travel costs). If you do not wish to provide bank details we can reimburse by cheque (while that method remains available). Details of this and other details such as National Insurance number and start dates are kept securely. You may ask the Finance Manager for sight or any details held about you.

*Pension:* if you are eligible as an employee to join the workplace pension scheme, we or the pension provider may ask for additional information relating to that, but primarily this is driven by the payroll system. See above. Please ask the Financial Manager for sight or any details held about you regarding pensions.

*Skills and experience:* we may as both employees and volunteers ask for evidence of qualifications (i.e. certificates), or details of previous employment. We may ask for referee information to acquire a reference. These details are retained within a personnel file kept securely in the case of employees. In the case of volunteers, in your individual volunteer record and within the membership and volunteering database. Staff: you may ask your Line Manager for sight of your own personnel file. Volunteers: you may ask the Supervisor responsible for volunteering and membership for records held about you.

*Training:* We may require you to undergo specific training while a volunteer or staff member. This includes for example: Health and Safety Training, Customer Service Training, Safeguarding Training, fire safety training, manual handling. Any certification or attendance records are kept on the individual's personnel file or within the membership and volunteering database and where appropriate physical records. You may ask to see these at any time.

*Board Members:* on nomination for the post of Board Member (Trustee) of the Board of Management, we will ask you for details of relevant skills and experience which are shared with the membership. A personal statement is also requested.

*Medical information:* as volunteers and employees we may in some circumstances require you to undergo a medical examination or to provide private medical information. In other circumstances it is in your best interests to provide details of disabilities and support needs so these may be taken into account and measures taken to support you in your work. These details are used for the purposes described only and are kept securely.

*Gift Aid:* in order to make a claim to HMRC we need to ask for your name, address and post-code and whether or not you are a UK tax-payer. If you are not a UK tax-payer you cannot 'gift aid'.

*First-Aid and emergencies:* if in the unfortunate circumstances you need emergency assistance, or if you experience an incident that needs reporting on Health and Safety grounds, we may ask for some personal contact details. If so these are used for that purpose only, for example to contact you again for insurance purposes or to discuss an event or incident. Incidents may be discussed at H&S management meetings but with personal data removed.

*Electronic Newsletter:* we produce a regular e-newsletter sent by email. This is sent to those who gave express permission to receive it. We will not send you this newsletter if not requested. We will not use your contact details collected for another purpose (i.e. gift-aid, contract of employment, volunteer agreement) to send you this e-newsletter.

*Donations:* If you are donating cash (for example a collection box) there is no obligation to provide any personal details, though gift-aid forms are available. Cheque and other donations for either specific campaigns or general donations will be acknowledged/thanked if requested but will not be made public unless expressly negotiated and discussed.

### Who we might share your information with:

We do not share or sell your personal data that may be collected as part of your visit (or your business contract) to any other person, or organisation (with the exception of what we are required to do in regards to Gift Aid and the HMRC and the workplace pension provider).

### How we keep information secure?

We have implemented physical security procedures, rules and IT technical measures to protect the personal data that we have under our control from:

- Unauthorised access
- Improper use or disclosure
- Unauthorised modification

Employees and authorised volunteers who have access to, and are associated with, the processing of personal data, are legally obliged to respect the confidentiality of your personal data.

Measures include the storage of personal data in secure areas not accessible to the general public or non-authorised members or volunteers.

## 16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, we require that you get your parent/guardian's permission on any volunteer agreement which is renewed annually until over the age of 16. We have a full safeguarding policy for all staff and volunteers.

## Your obligations

You have a duty and an obligation to not share commercial data about High Peak CVS and private personal data about individuals (members, non-members, volunteers and public visitors) to anyone outside the organisation and only within the organisation when it is necessary to fulfil your duties.

You must:

- Not keep any data which contains personal information at home (names, addresses, dates of birth, medical information etc.) without the express permission of the Data Protection Officer or your line manager. Measures must be implemented for any authorised data kept at home, for example a locked cupboard or encrypted drive/memory stick.
- Not leave personal data unattended on desks or in unlocked draws when not being worked on. Effort must be made to secure data at night in locked and secure areas.
- surrender personal data about members, staff, non-member volunteers and public visitors if your duties no longer require you to have it anymore.
- **not** contact another member, staff member, non-member volunteer or public visitor using personal data you have without express permission of that person, or the Data Protection Officer or your line manager.
- Ensure that requests for personal data (for example the address of a particular member) are made via the Data Protection Officer or your line manager.
- Ensure that any authorised data you have meets the requirements of the data retention policy, i.e. is not kept longer than required by the policy.

Managers or supervisors who keep data on volunteers must ensure that data is secure from unauthorised access.

If these requirements are broken this may result in disciplinary action.

## How can I access the information about me?

You can ask us if we are keeping any personal data about you and you can also request to receive a copy of that personal data – this is called a Subject Access request.

Applications of this nature should be made in writing to:

High Peak CVS  
Dunbar House, 105 Buxton Road  
Whaley Bridge, High Peak  
SK23 7HX

## Changes to our privacy policy

We regularly review our privacy policy and may make changes from time to time. This privacy policy was last changed on the **1<sup>st</sup> July 2020**.

## How to contact us:

If you have any comments on our privacy notice, or on information we hold about you, please write to:

High Peak CVS  
Dunbar House, 105 Buxton Road  
Whaley Bridge, High Peak  
SK23 7HX  
Email: [hello@highpeakcvs.org.uk](mailto:hello@highpeakcvs.org.uk)

## Data Retention Policy

We will only keep personal information for the minimum period it is necessary to do so.

*Payroll documentation:* related documentation and records like P45s, P60s and change of tax codes must be kept under statutory provision for 6 years plus the current year.

*Personnel records:* continuously while an employee/volunteer; 6 years after leaving employment.

*Applications:* application forms and interview notes: 6 months from interview

*Pensions schemes:* while you are an employee and within a scheme your data is kept continuously relating to the scheme, once left employment: 6 years after date of death or 10 years after benefit ceases, whichever comes first.

*Volunteer details:* continuously while a volunteer; 2 years after ceasing to be a volunteer (in case of return to volunteering).

*Gift Aid:* we are obliged to keep gift-aid records for 7 years.

*First-Aid and emergencies:* first-aid treatment forms and/or any associated incident report forms will be kept for 4 years, or later if there is the possibility of Legal Proceedings (we *must* retain insurance records for 3 years after the settlement of any claim).

*Accident Books, incident records, IRF's and the like:* 3 years after the end of any investigation/discussion period, subject to the above paragraph.

*Electronic Newsletter:* your email address will be retained for that purpose until such time as you request that you no longer wish to receive it.

*Monetary donations:* correspondence re donations is retained for 6 years from the end of the financial year in which the transaction was made. Any related gift-aid information is retained for 7 years. Any legacy/bequest, transacted by Will, Probate or Intestacy via a solicitor or relatives is retained for 6 years after the estate has been wound up. For specific fundraising campaigns we will keep lists of donors (and the amount) for the duration of the campaign (unless donated anonymously) for the purposes of tracking the total and to invite those donors to appropriate opening/launch events. You may opt out from receiving such invitations.

*Safeguarding:* it is anticipated that any documentation regarding safeguarding incidents will be kept indefinitely.