

ROYAL VOLUNTARY SERVICE

NHS VOLUNTEER RESPONDER SCHEME – PRIVACY NOTICE FOR VOLUNTEERS

NHS Volunteer Responders are here to help people in England to stay safe during COVID-19. The scheme has been set up by NHS England and NHS Improvement, working with Royal Voluntary Service and the GoodSAM app. The NHS Volunteer Responder Scheme aims to recruit and deploy a network of volunteers throughout England who are willing and able to provide certain categories of support to individuals who are self-isolating for age or health related reasons. Volunteers may also be asked to provide assistance to health care organisations, such as GPs and hospitals, with transport.

To run the NHS Volunteer Responder Scheme, Royal Voluntary Service will need to collect, use and store personal data relating to members of the public who apply to become and members of the public who are accepted as, NHS Volunteer Responders. Under UK data protection law, Royal Voluntary Service will be the controller of such personal data. This means that Royal Voluntary Service is required to explain to such members of the public how their personal data will be processed and what data protection rights they have.

Please read over this privacy notice carefully, because it contains important information about who we are and how and why we collect, store, use and share your personal data. It also explains your rights in relation to your personal data and how to contact us or supervisory authorities in the event you have a complaint. In addition, it explains the role of and our and your relationship with GoodSAM Limited in relation to the NHS Volunteer Responder Scheme.

KEY TERMS

In this privacy notice, for convenience, we use the following defined terms:

Individuals	individuals who receive support from NHS Volunteer Responders under the Scheme
GoodSAM App	the volunteering app owned and run by GoodSAM
GoodSAM Data	has the meaning set out in the section ' Our and your relationship with GoodSAM '
GoodSAM Limited	GOODSAM LIMITED (a company incorporated in England and Wales with registered number 8742979) whose registered office is at 1 Curtain Road, London, EC2A 3JX
GoodSAM Website	the volunteering website owned and run by GoodSAM and found at https://www.goodsamapp.org/
NHSE	NHS England
Our data protection officer	Name: Geraint Jugessur

	<p>Address: Beck Court, Cardiff Gate Business Park, Cardiff, CF23 8RP</p> <p>Email address: dataprotection@royalvoluntaryservice.org.uk</p> <p>Telephone: 029 2073 9184</p>
personal data	any information relating to an identified or identifiable living individual
SAP Concur	has the meaning set out in the section ' Our expenses system '
Scheme	the NHS Volunteer Responder Scheme
Shared Data	has the meaning set out in the section ' Our and your relationship with GoodSAM '
We, us, our	ROYAL VOLUNTARY SERVICE (a company incorporated in England and Wales with registered number 2520413, and a registered charity with number 1015988) whose registered office is at Beck Court, Cardiff Gate Business Park, Cardiff CF23 8R
You, your	a member of the public who applies to become an NHS Volunteer Responder or a member of the public who is accepted as an NHS Volunteer Responder, and at whom this privacy notice is directed

PERSONAL DATA WE WILL COLLECT

When you apply to become an NHS Volunteer Responder, we will collect the following personal data about you:

- Your full name;
- Your address, email address and telephone number;
- Information to enable us to check and verify your identity (e.g. a copy of your passport or driving licence);
- Details of which volunteering roles you wish to opt for; and
- If you volunteer to provide support to Individuals with transport to hospital or other medical appointments or if you volunteer for our CRV+ role (i.e. an NHS Volunteer Responder who is cleared to work with vulnerable adults), a copy of an Enhanced DBS with Children's or Adults' Barred list (or both), dated within the last 12 months.

If you are accepted as an NHS Volunteer Responder, we will also receive the following personal data about you:

- As a result of our and your use of the technology which underpins the Scheme (see the section below '**Our and your relationship with GoodSAM**'), we will receive data about the volunteering tasks you accept and perform;
- If you submit a claim to us for expenses, we will need to obtain information from you to enable us to verify the expenses you are claiming (such as copies of receipts and details of journeys you have taken when performing your role as an NHS Volunteer Responder). We will also need your bank details so that we can reimburse you. Further information about how our expenses system will work is set out below in the section below '**Our expenses system**');
- Personal data you provide to us if you telephone our call centre or email us with a query or issue and/or personal data provided to us by Individuals or other persons or organisations you interact with as a result of your role as an NHS Volunteer Responder; and
- Personal data we obtain from you automatically if you use our NHS Volunteer Responder website (for example, your IP address and cookie data).

HOW AND WHY WE USE YOUR PERSONAL INFORMATION

Under UK data protection law, we can only use your personal data if we have a lawful basis for doing so. For example:

- to comply with our legal and regulatory obligations;
- for our legitimate interests or those of a third party; or
- where you have given consent.

A legitimate interest is when we have a reasonable need to use your information, so long as this is not overridden by your own rights and interests.

The table below explains what we use your personal data for and our lawful basis for doing so under UK data protection law:

What personal data we use	Why we use it	Our lawful basis
Copies of the documents you provide to verify your identity or, where required, to confirm you have the necessary level of DBS clearance	To verify your identify and, where applicable, to ensure you have the necessary level of DBS clearance	Our legitimate interest in ensuring you are who you say you are and are a suitable person to provide certain categories of volunteering support. Also, the legitimate interests of Individuals in ensuring they are safe and subject to appropriate safeguarding

What personal data we use	Why we use it	Our lawful basis
The information you input into our online application form	To register you as an NHS Volunteer Responder and keep a record of your details	Our legitimate interest in administering the Scheme effectively
Information we collect about volunteering tasks you accept and perform	To ensure that Individuals receive the support they need and to enable us to keep track of the support provided by our volunteers	Our legitimate interest in ensuring that the Scheme is run effectively
The information you input into our online application form and the level of DBS clearance you have	To appropriately match volunteers to Individuals	Our legitimate interest in ensuring that Individuals are protected and kept safe and the legitimate interests of Individuals in ensuring the same
The information you input into our online application form	So that we can deal with any queries we receive from you	Our legitimate interest in ensuring that the Scheme is run effectively
The information you input into our online application form and the level of DBS clearance you have	To ensure you are performing your role in accordance with our instructions and guidance and so that we can investigate any complaints we receive	Our legitimate interest in ensuring that the Scheme is run properly and safely Our legal obligation to investigate complaints
Your full name, email address and/or postal address	So that we can correspond with you about the Scheme	Our legitimate interest in ensuring that the Scheme is run effectively
Information about expenses you are claiming and payment details to enable us to reimburse you	To enable us to process claims for expenses and reimburse you	Your legitimate interest in being reimbursed for such expenses
Information we obtain about you if you telephone our call centre with a query or as a result of communications with Individuals or other third parties about your role and/or volunteering tasks you have performed	To enable us to manage your role as an NHS Volunteer Responder, deal with your queries and respond appropriately to information provided to us by Individuals or other third parties	Our legitimate interest in ensuring that the Scheme is run effectively Your legitimate interest in having your queries dealt with appropriately The legitimate interests of Individuals and other third parties (e.g. such as their interests in ensuring that

What personal data we use	Why we use it	Our lawful basis
		complaints are dealt with promptly and appropriately)
Data we collect automatically if you use our NHS Volunteer Responder website	To enable us to run the website effectively	Our legitimate interests and, in relation to cookie data, your consent. You can find more information about our lawful basis for using such data in our general privacy notice, available on the main Royal Voluntary Service website
Your full name, email address and/or postal address	So that we can contact you at the end of the Scheme to ask whether you would like to take on a broader volunteering role for us	Your positive consent

In addition, where you are required to provide us with a copy of a DBS certificate so that we can check you are an appropriate person to take on certain volunteering roles, it is possible that we may process criminal convictions data about you. Where this is the case, we will rely on a special condition under UK data protection law which permits us to process criminal convictions data where we are required to do so for the purpose of carrying out our obligations in the field of employment and social protection law. We are required to put an 'appropriate policy document' in place in relation to our processing of such personal data. If you would like to see a copy of our appropriate policy document, please contact us.

PROMOTIONAL COMMUNICATIONS

We will always treat your personal data with the utmost respect and will not sell or share it with other organisations for marketing purposes.

Whilst the Scheme is ongoing, we will only use your personal data for the purposes of running and administering the Scheme (as set out in the section '**How and why we use your personal information**' above).

At the end of the Scheme, if you have provided us with your consent to do so, we will email or write to you to ask you if you would like to take on a broader volunteering role for Royal Voluntary Service. Please note that you have the right to withdraw your consent to us contacting you for this purpose at any time (to do so, please use the contact details set out in the section '**How to contact us**' below).

OUR AND YOUR RELATIONSHIP WITH GOODSAM

The effective operation of the Scheme relies upon technology made available to NHSE, Royal Voluntary Service and you by GoodSAM.

In particular:

- To apply to become an NHS Volunteer Responder, you will need to fill out the online application form on the GoodSAM Website;
- If you are accepted as an NHS Volunteer Responder, you will need to download, install and use the GoodSAM App so that we can notify you of volunteering tasks in your area and you can accept and perform volunteering tasks; and
- We will use a software platform made available to us by GoodSAM (which will interface with the GoodSAM App) to help us run the Scheme.

This means that we will need to share your personal data with GoodSAM. It also means that you will provide some personal data to GoodSAM directly. Consequently, GoodSAM's role under UK data protection law will vary depending on what personal data it is processing and why. In this section, we provide more information about our and your relationship with GoodSAM.

GoodSAM as our data processor

In relation to the following personal data, GoodSAM will act as our data processor and process your personal data on our behalf:

- GoodSAM's use of the personal data you provide to us when you apply to become an NHS Volunteer Responder;
- Other personal data about you which is input into the GoodSAM software platform as a result of your dealings with us as an NHS Volunteer Responder; and
- Personal data relating to the acceptance and performance by you of volunteering tasks which we obtain as result of the interface of the GoodSAM software platform with the GoodSAM App.

Where GoodSAM processes your personal data as our data processor, GoodSAM will be subject to contractual obligations to us only to process your personal data in accordance with our instructions, not to use your personal data for other purposes and to keep your personal data safe and secure.

GoodSAM as joint controller

If you are accepted as an NHS Volunteer Responder, to enable GoodSAM to create an account for you on the GoodSAM App, Royal Voluntary Service will need to make available to GoodSAM your full name and email address (**'Shared Data'**).

GoodSAM and Royal Voluntary Service will then become joint controllers of the Shared Data. This means that both Royal Voluntary Service and GoodSAM will have certain rights to use the Shared Data but must also comply with the obligations and restrictions set out in UK data protection law.

For the duration of the Scheme, GoodSAM will be subject to contractual obligations to us only to use the Shared Data for the purposes of providing and running the technology which underpins the Scheme. However, once the Scheme has come to an end, GoodSAM's use of the Shared Data will be in accordance with its privacy notices and policies (subject to its obligation to use the Shared Data in accordance with UK

data protection law). GoodSAM should be able to provide you with a copy of such notices and policies.

While the Scheme is ongoing, you may submit a request to exercise any of the rights referred to in the section '**Your rights**' below in relation to the Shared Data to either GoodSAM or Royal Voluntary Service.

GoodSAM as sole controller

In relation to your use of the GoodSAM Website and the downloading, installation and use by you of the GoodSAM App, you will have a direct relationship with GoodSAM. This means that, in relation to GoodSAM's collection and use of the following personal data, GoodSAM will be acting as sole controller:

- Personal data automatically collected from you by GoodSAM as a result of your use of the GoodSAM Website (for example, your IP address and cookie data);
- Personal data collected from you by GoodSAM when you download, install and use the GoodSAM App (other than personal data that relates to your volunteering role in relation to the Scheme). For example, data relating to your mobile phone or other device, location data and any profile you create on the GoodSAM App.

GoodSAM will use such personal data (referred to from here on as '**GoodSAM Data**') in accordance with its own privacy policies and notices (subject to compliance by GoodSAM with the requirements of UK data protection law). Such policies and notices should be available on GoodSAM's website and when you download and install the GoodSAM App. Any requests to exercise any of the rights referred to in section '**Your rights**' below will need to be made to GoodSAM and any claims you have for misuse of the GoodSAM Data will need to be made against GoodSAM.

OUR EXPENSES SYSTEM

As an NHS Volunteer Responder, you will be able to submit claims to us for the reimbursement of certain expenses (we will email you with details of what expenses you can claim and how to do this). To assist us with the administration and processing of expenses claims and payments, we will use an expenses system provided by Concur Holdings (Netherlands) B.V. ('**SAP Concur**').

The expenses system will work in the following way:

- Once you have completed your first volunteering task, we will share your name, email address and your unique volunteer identification number with SAP Concur. This will enable SAP Concur to create a user account for you on its expenses system;
- Before you can submit any claims for expenses, you will need to have downloaded and installed the SAP Concur App onto your mobile phone or other device. Once you have done so, to access your account on the SAP Concur App, you will need to verify your email address and unique volunteer identification number;
- To submit an expenses claim you will need to access your account on the SAP Concur App and input details about the expenses you are claiming. The details will vary depending on what expenses you are claiming (for example, to make

a mileage claim you will need to enter the start and end point of your journey and to claim for hand sanitiser you will need to upload a photograph of your sales receipt). In most cases, you will also need to provide the job identification number to which the claim relates. In addition, you will be asked to input details of the bank account into which you require any payment to you to be made.

- If your expenses claim is accepted, we will pay the amount of expenses you are entitled to directly into your bank account.

We have entered into an agreement with SAP Concur relating to the provision of its expenses system. Under that agreement, SAP Concur will process any personal data relating to you which comes into its possession as a result of: (i) us sharing information with SAP Concur so that an account can be created for you; and (ii) you making an expenses claim ('**Expenses Data**') as the processor of Royal Voluntary Service. This essentially means that SAP Concur will be required to process Expenses Data strictly in accordance with our instructions and for no other purposes.

Under our agreement, SAP Concur has authorisation to share Expenses Data with sub-contractors that it uses to provide its expenses system, but any such sharing by SAP Concur must be on and subject to equivalent terms to those set out in our agreement with SAP Concur and will therefore restrict the processing of Expenses Data by such sub-contractors.

SAP Concur will retain Expenses Data for a period of 6 months following the end of our agreement with SAP Concur. After the expiry of this period, SAP Concur will erase your personal data.

As stated above, however, before you can make any claims for expenses, you will need to download and install the SAP Concur App. If you do so, you will be entering into a direct relationship with SAP Concur in relation to your use of the SAP Concur App. Also, SAP Concur will become a controller of certain of your personal data (such as data it obtains relating to the device on which you install and use the SAP Concur App and your location data). SAP Concur's terms of use and privacy information relating to its App should be available to you at the time you download and install the SAP Concur App.

SHARING OF YOUR PERSONAL DATA WITH OTHER THIRD PARTIES

As well as GoodSAM and SAP Concur, we will also need to share your personal data with certain other trusted organisations who are providing essential services to us in relation to the Scheme. This includes:

- Ventrica Limited, the organisation which operates our NHS Volunteer Responder call centre, helps us to check the identity and DBS certificates of members of the public who apply to become NHS Volunteer Responders and undertakes certain other work on our behalf;
- Our mailing partner, The Woods Group Limited;
- The organisations which host our websites and software systems;
- Our insurers and our banks; and
- Our professional advisers (such as lawyers and accountants).

We only allow our service providers to handle your personal information if we are satisfied they take appropriate measures to protect your personal information. We also impose contractual obligations on service providers relating to ensure they can only use your personal information to provide services to us and to you.

We may also disclose and exchange information with law enforcement agencies and regulatory bodies to comply with our legal and regulatory obligations.

HOW LONG YOUR PERSONAL INFORMATION WILL BE KEPT

Unsuccessful Applications

In the event that we are unable to accept your application to become an NHS Volunteer Responder, we will delete your application form from our system as soon as reasonably practicable. This will include any copy documentation you have provided to us to verify your identity and any copies of DBS certificates. We will, however, retain your name and email address for the duration of the Scheme. This is necessary for our general record keeping and audit purposes and so that we can compile statistics relating to the total number of applications received.

Successful Applications

If you are accepted as an NHS Volunteer Responder, our general retention policy will be to retain your personal data for the duration of the Scheme plus an additional period of 6 months. While the Scheme is still operational, we need to retain your personal data to enable us to run the Scheme effectively. Retention for a further period of 6 months after the Scheme has ceased to operate is necessary for our general business purposes (including audit and processing expenses claims) and to enable us to deal with any ad hoc queries and/or complaints which arise.

Please note that it is currently envisaged that the Scheme will run for a period of 6 months from the start of April 2020. However, it is possible that NHSE will extend the duration of the Scheme and if this happens, we will review our general retention policy and evaluate whether any personal data which is no longer required can be deleted at this stage.

Our general retention policy referred to above is subject to the following exceptions:

- If you submit an expenses claim to us (see section above '**Our expenses system**') we will retain Expenses Data for a period of 7 years from the end of the financial year in which the claim is submitted. This is necessary to enable us to comply with statutory requirements relating to accounting and taxation.
- We may need to retain your personal data for a longer period to deal with any complaints, grievances, investigations or legal claims or actions involving or relating to you. In this situation, situation, we will retain such personal data as is necessary to deal fully with the relevant complaint, grievance, investigation or legal claim or action;
- If a safeguarding concern arises, we will retain such personal data relating to you as may be necessary to deal with the issue and/or meet our obligations in relation to safeguarding (including any regulatory or legal obligations); and
- We will retain information relating to the Scheme for the purposes of archiving in the public interest and historical research. Such information may include

your personal data. Any such retention and subsequent processing of your personal data will be in accordance with the National Archives Guide to Archiving Personal Data 2018.

In addition, if, at the end of the Scheme, you agree to take up a broader volunteering role for us, we will retain such of your personal data as is necessary to register you as a general Royal Voluntary Service Volunteer. Subsequently, our use and retention of your personal data will be in accordance with our general privacy notice and retention policy (you can find links to these documents on our main Royal Voluntary Service website).

Deletion of personal data

Once it is no longer necessary for us to retain your personal data, we will ensure that it is permanently and securely deleted or anonymised.

Our retention Schedule

Further details about our retention policy can be found in our retention schedule relating to the Scheme. Please contact us if you would like to be provided with a copy of this.

WHERE YOUR PERSONAL INFORMATION IS HELD

Your personal data will be held in the UK on the GoodSAM software platform. It will not be transferred by us or GoodSAM outside the UK and/or EEA.

However, in relation to the GoodSAM Data, it is possible that GoodSAM may store or transfer your personal data outside the UK and/or EEA. Where GoodSAM does so, GoodSAM should make available to you information about how it safeguards your personal information.

YOUR RIGHTS

Under data protection law, you have a number of different rights which you can exercise free of charge. These are described in the table below. Some of the rights only apply in certain circumstances and not all of the rights will be relevant in relation to our use of your personal data:

Access	The right to be provided with a copy of your personal data (the right of access)
Rectification	The right to require any mistakes in your personal data to be corrected
To be forgotten	The right, in certain circumstances, to require that your personal data is deleted
Restriction of processing	The right, in certain circumstances, to require use of your personal data to be restricted (for example, if you contest the accuracy of the data)
Data portability	The right, in certain circumstances, to receive your personal data in a

	structured, commonly used and machine-readable format and/or transmit that data to a third party
To object	The right to object to your personal data being processed for direct marketing (including profiling) and the right, in certain circumstances, to object to the continued processing of your personal data on the basis of legitimate interests
Not to be subject to automated individual decision making	The right not to be subject to a decision based solely on automated processing (including profiling) that produces legal effects concerning you or similarly significantly affects you

For further information on each of these rights, including the circumstances in which they apply, please contact us or see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals' rights under the General Data Protection Regulation](#).

If you would like to exercise any of your rights, please email, call or write to our Data Protection Officer (see below: '**How to contact us**'). Please note that we will ask you to:

- Let us have enough information to identify you;
- Provide us with proof of your identity and address (e.g. a copy of your driving licence or passport); and
- Let us know what right you want to exercise and the information to which your request relates.

KEEPING YOUR PERSONAL INFORMATION SECURE

If you are accepted as an NHS Volunteer Responder, the personal data you provide to us in your application form will be stored in a secure database made available to us by GoodSAM for the purpose of the Scheme. Your personal data will be kept separate from other personal data stored by GoodSAM.

In addition, we have appropriate security measures to prevent personal data from being accidentally lost or used or accessed unlawfully. We limit access to your personal information to those who have a genuine business need to access it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

HOW TO COMPLAIN

We hope that our Data Protection Officer can resolve any query or concern you may raise about our use of your personal data.

The [General Data Protection Regulation](#) also gives you right to lodge a complaint with a supervisory authority, in particular in the European Union (or European Economic Area) state where you work, normally live or where any alleged infringement of data protection laws occurred. The supervisory authority in the UK is the Information Commissioner who may be contacted at <https://ico.org.uk/concerns> or telephone: 0303 123 1113.

CHANGES TO THIS PRIVACY POLICY

This privacy notice was first published on 23 April 2020.

A revised version of this privacy notice was published on 6 May 2020.

A further revised version of this privacy notice was published on 29 May 2020.

We will make updated versions of our privacy notice available on our NHS Volunteer Responder website.

HOW TO CONTACT US

Please contact us/our Data Protection Officer by post, email or telephone if you have any questions about this privacy policy or the personal data we hold about you.

Our contact details are shown below:

Our data protection officer	Geraint Jugessur
Our postal address	Royal Voluntary Service, Beck Court, Cardiff Gate Business Park, Cardiff, CF23 8RP
Our email address	Email address: dataprotection@royalvoluntaryservice.org.uk
Our telephone number	029 2073 9184