

Coram Trustee Privacy Notice

We recognise that your privacy is important and we take our responsibility for safeguarding your personal data very seriously. We are also committed to being transparent about how we collect and use your data and to meeting our data protection obligations. As the organisation engaging you as a senior volunteer - governor, director, trustee, co-opted committee member, Coram needs to keep and process information about you for governance purposes. This policy sets out the basis by which we collect, use and disclose that personal data, as well as your rights in respect of such personal information.

Under data protection laws, Coram is defined as a data controller¹. In this Privacy Notice, references to “Coram”, “we”, “us” and “our” mean the Coram Group and all its subsidiaries. For clarity, the Coram Group is comprised of the following charities and trading subsidiaries: Coram, Coram Trading, Coram Life Education, Coram Life Education Trading, Coram Children’s Legal Centre, Coram Voice, Coram Cambridgeshire Adoption and CoramBAAF. The registered address of the Coram Group is 41 Brunswick Square, London, WC1N 1AZ. Your main point of contact for data protection queries is the Managing Director of HR & Compliance, who can be contacted by emailing dataprotection@coram.org.uk.

References to “Data Protection Laws” in this policy are to the EU General Data Protection Regulation (2016/679), the EU Privacy and Electronic Communications Directive 2002/58/EC as implemented in the UK, and any amending or replacement legislation.

We may update this Privacy Notice from time to time and will publish an up-to-date copy of the Privacy Notice on SharePoint.

What personal information do we collect?

Coram collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms of your Trustee or Director, co-opted or volunteer engagement;
- details of your qualifications, skills, experience, employment history, including start and end dates, with previous employers and with the organisation
- details of membership of any professional bodies, political/special interest groups or mutual support organisations
- details of any other appointments you hold; such as trusteeships, directorships, local authority memberships
- details of any investments in either listed or unlisted companies, major shareholdings or partnerships or other forms of business or beneficial interests.
- Information on whether you have any other special interests in the Coram group whether you care for a user of Coram’s services

¹ A controller determines the purposes and means of processing personal data i.e. they are responsible for deciding why and how personal data is used.

- information about your claims for expenses;
- details of your bank account (for the purpose of paying any expenses) ;
- information about your marital status, next of kin, dependants and emergency contacts; information about your nationality and entitlement to work in the UK;
- information about the results of any DBS checking;
- details of your schedule (the days and hours you volunteer with us);
- details of training you have participated in;
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments;
- information relating to accidents or incidents in the workplace; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

How do we collect your personal data?

Much of the personal information we hold will have been provided by you directly. For example, data is collected through application forms or CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during volunteering; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the organisation collects personal data about you from other internal sources, such as from Coram's Chief Executive Officer , Coram's Managing Directors, or in some cases, external sources, such as references supplied by former employers, and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your personnel file, in the organisation's HR people management systems and in other IT systems (including the organisation's email system).

Why does the organisation process your personal data?

We keep and use your information to enable us to run the organisation and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are engaged with us, at the time when your engagement ends and after you have left. The information we hold and process will be used for our management and administrative use only and will not be shared with third parties.

Coram relies on the following legal grounds to legitimise the processing of your information.

- (i) Processing data enables us to comply with our legal obligations. For example, it is required to check an employee's entitlement to work in the UK and to comply with health and safety laws and fulfil FRS reporting standards. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.
- (ii) In other cases, the organisation has a legitimate interest in processing personal data before, during and after the end of the volunteer relationship. Processing volunteer data allows the organisation to:
 - run recruitment processes;
 - fulfil the operation of Good Governance standards including contrast of interest;
 - maintain accurate and up-to-date volunteer records and contact details (including details of who to contact in the event of an emergency); operate and keep a record of volunteer

performance and related processes, to plan for development, and for succession planning and governance skills;

- ensure effective general HR and business administration;
- provide references on request for current or former volunteers;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

We will never process your data where these interests are overridden by your own interests.

- (iii) Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to volunteers with disabilities and for health and safety purposes).
- (iv) Where the organisation processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the organisation uses for these purposes is anonymised or is collected with the express consent of volunteers, which can be withdrawn at any time. Volunteers are entirely free to decide whether or not to provide such data.

Who has access to your personal data?

Your information will be shared internally, for the purposes set out above, to staff involved with HR and finance, line managers, and IT staff if access to the data is necessary for performance of their roles.

The organisation shares your data with third parties in order to obtain pre-employment references from other employers, and obtain necessary criminal records checks from the Disclosure and Barring Service.

Coram also shares your data with third parties that process data on our behalf, in connection with archiving of files

When we outsource the processing of your information to third parties or provide your information to third party service providers, we oblige those third parties to protect your information with appropriate security measures and prohibit them from using your information for their own purposes or from disclosing your information to others.

Coram may make information available to regulatory authorities, for example the Charities Commission or Companies House, potential or future employers, governmental organisations, and third parties if required by any regulatory or legal authority. The organisation may also share your data with third parties in the context of a sale of some or all of its business. In those circumstances the data will be subject to confidentiality arrangements.

We reserve the right to disclose any information we have concerning you if we are compelled to do so by a court of law or requested to do so by a governmental entity or if we determine it is necessary or desirable to comply with the law or to protect or defend our reputation, rights or property.

How does the organisation protect data?

Coram takes the security of your data seriously. The organisation has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Your data is protected

physically through locked cabinets and key-pad access to the HR office, and electronically through encryption and systems restrictions.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

For how long does the organisation keep data?

We will keep your information for as long as is necessary to fulfil our legal obligations, and in accordance with data protection laws.

When you take up a senior volunteer governance role with Coram, we will compile a file relating to your engagement with us. The information contained in this will be kept secure and will only be used for purposes directly relevant to your role. Once your role with Coram ends, we will retain the file in accordance with the requirements of our retention schedule. The retention period varies depending on the role(s) you have held with Coram (e.g. longer periods may apply if you worked with hazardous substances) but at the end of that period the personal information in your file will be securely and permanently deleted.

For ease of reference, the key periods for which your data is held after the end of engagement are:

Record	Examples	Retention period	Legal basis
Volunteer file		6 years	Limitation Act 1980 S.5
Finance Records	Expense claims	Up to 10 years	Retained to ensure compliance with charity commission requirements to summarise all monies paid out.
Health and safety	Accident/Incident report	3 years	Social Security (Claims and Payments) Regulations 1979, Reg. 25(3); Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995, Reg.7
Basic volunteer details	Volunteer name, dates of employment and job title on leaving Coram	Indefinitely*	Retained to enable response to future reference requests
Governance Records	Terms of Office, roles held, disclosure information	Indefinitely*	Reframed as governance record

*Volunteers have the right to request that this data is erased.

Your rights

Under data protection laws, you have a right to request a copy of some or all of the personal information Coram holds about you. You also have a right to correct inaccurate data, and, in some circumstances, may have a right to request erasure of data, data transfer (or “data portability”), and to object to or restrict processing.

To find out more about your rights, to exercise any of your rights, or if you have any questions or concerns about data protection at Coram, email dataprotection@coram.org.uk or write to the Managing Director of HR & Compliance, 41 Brunswick Square, London WC1N 1AZ.

What if you do not provide personal data?

You have some obligations under your appointment agreement to provide the organisation with data. Certain information, such as contact details and your right to work in the UK, have to be provided to enable the organisation to enter into an appointment agreement with you. If you do not provide other information, this will hinder the organisation's ability to administer the terms of your volunteer agreement efficiently and you may not be eligible for appointment.

Automated decision-making

Coram does not base any of its decisions solely on automated decision-making.

Data Protection Regulator

If you have any concerns or comments about how we use information, we would like to hear from you. Alternatively, you may contact the Information Commissioner's Office (ICO) for guidance and advice, or to lodge a complaint. The ICO may be contacted at:

Online: www.ico.org.uk

Post: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113 (local rate) or 01625 545745 (national rate)