



Daybreak privacy notice - for Volunteers

Daybreak Oxford volunteers privacy notice

Registered name: Daybreak Oxford

We are the controller of your personal data. For more information on controllers and their responsibilities please see our guidance on [data protection principles, definitions, and key terms](#).

This privacy notice tells you what to expect us to do with your personal information when you work for us.

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- [What information we collect, use, and why](#)
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Contact details

Post: Daybreak, The Clockhouse Long Ground, Blackbird Leys, Oxfordshire, OX4 7FX, GB

Telephone: 01865 776744

Email: Admin@daybreak-oxford.org.uk

What information we collect and use, and why:

recruitment, administration and management

We use the following personal information as part of **recruitment, administration and management**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- Gender
- Photographs (eg ID card)
- Copies of proof of address documents (eg bank statements or bills)
- Next of kin or emergency contact details
- Right to work information
- Details of any criminal convictions (eg DBS checks)
- Monitoring employees' IT use

Health and wellbeing

We collect or use the following personal information for **managing volunteer health and wellbeing**:

- Accident at work records

Lawful bases and data protection rights

Under UK data protection law, we must have a “lawful basis” for collecting and using your personal information. There is a list of possible [lawful bases](#) in the UK GDPR. You can find out more about lawful bases on the ICO’s website.

Which lawful basis we rely on may affect your data protection rights which are set out in brief below. You can find out more about your data protection rights and the exemptions which may apply on the ICO’s website:

- **Your right of access** - You have the right to ask us for copies of your personal information. You can request other information such as details about where we get personal information from and who we share personal information with. There are some exemptions which means you may not receive all the information you ask for. [Read more about the right of access](#).
- **Your right to rectification** - You have the right to ask us to correct or delete personal information you think is inaccurate or incomplete. [Read more about the right to rectification](#).
- **Your right to erasure** - You have the right to ask us to delete your personal information. [Read more about the right to erasure](#).
- **Your right to restriction of processing** - You have the right to ask us to limit how we can use your personal information. [Read more about the right to restriction of processing](#).
- **Your right to object to processing** - You have the right to object to the processing of your personal data. [Read more about the right to object to processing](#).
- **Your right to data portability** - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you. [Read more about the right to data portability](#).
- **Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent at any time. [Read more about the right to withdraw consent](#).

If you make a request, we must respond to you without undue delay and in any event within one month.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

Our lawful bases for the collection and use of your data

Our lawful bases for collecting or using personal information as part of **volunteer recruitment, administration and management** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We collect and use personal information about volunteers where this is necessary for recruitment, administration, management, supervision, training, safeguarding and health and safety purposes. This includes assessing applications, carrying out appropriate checks, maintaining records, communicating with individuals, arranging activities, reimbursing expenses and supporting volunteers in their roles. We have a legitimate interest in ensuring that people who volunteer with us are suitable, appropriately trained and supported, and that we can deliver safe, effective and high-quality services. Processing this information benefits the charity, our volunteers, and the people who use our services by enabling appropriate safeguarding, support, communication and operational management. We only collect and use information that is relevant and necessary for these purposes. We take steps to protect individuals' privacy through secure storage, restricted access, retention controls and confidentiality measures. We have balanced our interests against the rights and freedoms of individuals and are satisfied that the processing is proportionate, expected and does not unduly impact privacy.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Vital interests – collecting or using the information is needed when someone's physical or mental health or wellbeing is at urgent or serious risk. This includes an urgent need for life sustaining food, water, clothing or shelter. All of your data protection rights may apply, except the right to object and the right to portability.

Our lawful bases for collecting or using personal information as part of **managing volunteer health and wellbeing** are:

- Consent - we have permission from you after we gave you all the relevant information. All of your data protection rights may apply, except the right to object. To be clear, you do have the right to withdraw your consent at any time.
- Legal obligation – we have to collect or use your information so we can comply with the law. All of your data protection rights may apply, except the right to erasure, the right to object and the right to data portability.
- Legitimate interests – we're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone. All of your data protection rights may apply, except the right to portability. Our legitimate interests are:
 - We collect and use limited health and wellbeing information about volunteers where this is necessary to support their safe participation in volunteering activities, to make reasonable adjustments where needed, and to protect the health, safety and wellbeing of volunteers, members and others who may be affected by our activities. This processing is in the legitimate interests of both the volunteer and the charity, as it helps ensure that volunteers can carry out

their roles safely and receive appropriate support. The information may be used to understand any health needs relevant to volunteering, respond appropriately in an emergency, manage wellbeing concerns, and enable volunteers to participate effectively. We only collect information that is necessary for these purposes and access is restricted to those who need it. We balance our interests against the rights and freedoms of volunteers, ensuring that information is handled confidentially, retained only as long as necessary, and not used in ways that volunteers would not reasonably expect. The benefits of processing this information, including improved safety, wellbeing and support for volunteers, outweigh the limited privacy impact created by collecting and using it.

For more information on our use of legitimate interests as a lawful basis you can contact us using the contact details set out above.

- Recognised legitimate interests - our pre-approved purpose for collecting or using personal information to manage volunteer health and wellbeing:

We need to respond to, or deal with, an emergency event or situation (the 'emergencies condition')., We need to prevent, detect, or investigate a crime, including the apprehension and prosecution of offenders (the 'crime condition')., We need to protect the physical, mental or emotional well-being of people who need extra support, or to protect them from harm or neglect (the 'safeguarding condition').

Where we get personal information from

We collect your information from the following places:

- Directly from you

How long we keep information:

Volunteer Information Retention Schedule

Type of Information	Retention Period	Reason
Volunteer application forms (successful applicants)	Duration of volunteering plus 6 years after volunteering ends	To manage volunteer relationships, respond to claims, and maintain organisational records.
Volunteer application forms (unsuccessful applicants)	12 months from recruitment decision	To respond to enquiries or complaints about the recruitment process.
Volunteer agreements	6 years after volunteering ends	Evidence of the volunteering arrangement and responsibilities.
Contact details and volunteer records	6 years after volunteering ends	Administration, safeguarding, insurance and legal purposes.
Training records	6 years after volunteering ends	Demonstrate training completed and compliance with organisational requirements.
DBS records/check information	No longer than 6 months after decision, unless a justified reason exists to retain limited information	In line with DBS Code of Practice. We do not retain DBS certificates.
Safeguarding concerns involving volunteers	25 years after closure of the concern (or longer if required by safeguarding guidance)	Protection of vulnerable adults and organisational safeguarding responsibilities.

Type of Information	Retention Period	Reason
Accident and incident reports involving volunteers	3 years from the date of the incident, or longer where required by insurers or where a safeguarding issue exists	Health and safety and insurance purposes.
Health information and reasonable adjustment records	Duration of volunteering plus 3 years	To support the volunteer and manage health and safety obligations.
Expense claims and related financial records	Current financial year plus 6 years	HMRC and accounting requirements.
Emergency contact details	Duration of volunteering, deleted promptly when volunteering ends	Required only while actively volunteering.
References provided for volunteers	1 year after recruitment decision, unless the volunteer is accepted and the reference forms part of their volunteer file	Recruitment purposes.

Volunteer records will be retained only for as long as necessary to fulfil the purposes for which they were collected, including volunteer management, safeguarding, health and safety, insurance, legal and regulatory requirements. Records will be securely deleted or destroyed when they are no longer required. Retention periods may be extended where there is an ongoing safeguarding concern, complaint, legal claim, regulatory investigation, or insurance matter.

For Daybreak, I would be inclined to keep core volunteer files for 6 years after the volunteer leaves, as this aligns with the limitation period for most legal claims and is the approach commonly taken by charities. DBS information should be treated separately and retained for the shortest period necessary.

For more information on how long we store your personal information or the criteria we use to determine this please contact us using the details provided above.

How to complain

If you have any concerns about our use of your personal information, you can make a data protection complaint to us:

Email: Admin@Daybreak-Oxford.org.uk

Telephone: 01865 776744

Post: The Clockhouse, Long Ground, Greater Leys OX4 7FX

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>