

Chapter One: Privacy & Data Protocols for Online Reading Volunteers

These protocols set out how Chapter One uses and protects any information that you provide to us when you complete your registration to become a volunteer, use our Chapter One website or when we record information that relates to your active volunteering with us. Chapter One is committed to ensuring that your privacy is protected and that any information that you give us will only be used in accordance with these protocols and our [Privacy Policy](#) (published on our website).

Chapter One keeps its policies and protocols under review and they may change this policy from time to time. The current version of this policy document is effective from January 2023.

1. Chapter One Contact information

To contact us in relation to any of the information contained in this document or in respect of any data protection matter, or to pursue any of rights under the General Data Protection Regulation (further information below), please email communityuk@chapterone.org

2. The Data Protection Principles

Chapter One applies the **Eight Data Protection Principles** when processing personal data:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained only for the purpose specified.
3. Personal data kept will be adequate, relevant and not excessive for the purposes required.
4. Personal data shall be accurate.
5. Personal data will not be kept for longer than is necessary for purpose.
6. Personal data will be processed in accordance with the rights of data subjects.
7. Appropriate technical and organisational measures will be taken against unauthorized or unlawful processing of personal data and against accidental loss, destruction or damage to personal data.
8. Personal data will not be transferred outside the EEA unless that country or territory ensures an adequate level of data protection for the rights and freedoms of data subjects, except where consent is given.

3. The legal basis on which we hold your data/information

Organisations are permitted to process data if they have a legal basis for doing so. Chapter One processes data on the basis that:

- You have given us your express and informed consent to process your data; and/or
- Chapter One has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which you have entered into; and/or
- Chapter One has a legal obligation to process data.

4. The information we record and use

We record and use the following information about you **only if and when you apply to volunteer with us**:

- name and organisation;
- contact information including mobile number and email address and city/region you plan to volunteer in;
- other information directly relevant to volunteer applications e.g languages you speak

If you are successful in applying to volunteer with us, we may record and use the following further information:

- your DBS status including the issue date, certificate number and a copy of your certificate where relevant (see section on 'How we process and use DBS checks');
- your volunteering history with us, and notes on your engagement and time spent in volunteering sessions;
- content of any feedback surveys, case studies or quotes you voluntarily provide;
- pupils you have worked with and their reading progress
- voice recordings of your reading sessions with pupils

5. The reasons why we record and use your information

Chapter One considers the information we record and use to fall within the reasonable expectations and legitimate interests of individuals who voluntarily apply to and/or consent to be part of Chapter One's Online Reading Volunteers programme. Information recorded **if and when you apply to volunteer with us** is primarily used to:

- to assess your suitability to volunteer with the young people we specifically support;
- to gather your contact information so we can tell you about volunteer opportunities and give you logistical information relating to these volunteer activities (core communications)
- to send you additional communications (see section 7).

Further information we record or request **if you are successful in applying to volunteer with us** may be used in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- record your engagement on our volunteering programmes;
- analyse and improve our programme delivery and impact.

6. Our Enhanced DBS (Disclosure and Barring Service) procedure

To meet our responsibilities in relation to child protection and safeguarding, it is necessary for all our volunteer volunteers to complete a full Enhanced DBS check, for which Chapter One will cover the cost.

We sub-contract an external online provider, uCheck, to process our DBS checks. Once you have registered with us, you will receive an email with instructions on how to complete an initial online DBS application form, which may involve the use of digital ID verification via a third party app.

Completing the DBS application will involve providing some of your personal details to uCheck and/or a third party app. This is only done with your consent.

If your DBS certificate is clear, we may share your DBS certificate details with partner schools in order to meet our respective safeguarding responsibilities. If your DBS certificate has a caution or conviction, we will request further details from you in order to complete a risk assessment, which we will then ask you to approve as consent for us to share it with our partner schools. Please note that once you have given permission for us to share details of a DBS certificate to a partner school, we are not responsible for the school's adherence to its privacy policies and legal obligations.

7. Our communications with you

Chapter One may contact you via email, phone or text to provide logistical information to you during your volunteer activities ('**core communications**'). In addition, when you sign up to volunteer Chapter One will ask if you wish to opt-in to receive, periodically via email, '**additional communications**' such as those listed below. If you do not opt-in you will not receive these additional communications.

- newsletters, volunteering tips & education policy updates;
- information about events relevant to your volunteering
- other ways to support us including optional donations, becoming an ambassador, developing a quote or case study on your volunteering, engaging in fundraising activities or social media;
- invitations to complete optional surveys or undertake word-of-mouth promotion of Chapter One's Online Reading Volunteers programme to friends or colleagues.

All additional communication emails include clear and easy opportunities to opt-out of these communications. However, if you no longer wish to receive these additional emails, or you would like no further contact from Chapter One entirely including our core communications, you can contact us at any time via email: uksupport@chapterone.org and we will remove you from our contact lists within three working days.

8. The storage, maintenance and upkeep of your information

We are committed to ensuring that your information is **stored securely**. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and organisational procedures to safeguard and secure data, including:

- the use of a limited access & password protected database and cloud storage solutions (like Google Drive, who explain their compliance with GDPR [here](#))
- suitable cyber-security safeguards and best practices;
- secure and timely deletion or destruction of any digital or hard-copies of personal data once it is no longer required.

We are committed to ensuring that the information we keep about you is **accurate and up to date**. We will therefore:

- update records as soon as possible whenever new information is supplied to ensure personal data is kept up-to-date.
- delete or correct information that is found to be inaccurate as soon as reasonably practicable

Data retention

Information recorded at the volunteer application stage and during any voluntary activities with Chapter One may be retained in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- maintain a record of unsuccessful applications;

- maintain a record of individual requests to restrict further use or ‘processing’ of their personal information, or requests for Chapter One to cease contacting them, in order to respect these requests in future;
- to ensure we don't accidentally duplicate information.

While data may be made inactive and/or inaccessible, Chapter One may not delete all personal data when your volunteering ends unless requested by you to do so. We will retain enough information necessary to confirm that the relationship existed – and that it has ended – as well as such details as may be reasonably necessary for one of the reasons given above. We will not keep your personal data for longer than is necessary unless we are required to do so by law or unless we have legitimate reasons to do as outlined above.

Please note that information regarding criminal convictions on DBS records will be deleted after a decision has been made by Chapter One on your suitability for a role, unless it is held for a longer period with your explicit consent.

Other volunteer information (name, employer, email, phone (if provided)) will be transferred from an ‘active’ environment (our password protected database) after one year, and be retained in a historical archive for up to 5 years for comparison purposes.

Data Storage and Transfer

In order to maintain our services to participants, we may store or transfer the personal information we collect about you to affiliates or trusted third party recipients in the United States of America. This includes our affiliated organisation, **Chapter One USA**) with which data is shared under the protection of a data sharing agreement that incorporates European Commission approved Standard Contractual Clauses (SCC). We also share an administrative Google Drive account with Chapter One USA which uses data storage facilities in the USA. These transfers are also subject to the SCCs.

Chapter One’s volunteer database storage is managed by Heroku, which is based in the USA. Heroku is owned by a company called Salesforce which ensures data privacy as explained in its [Data Processing Addendum](#) (DPA) and this [FAQ document](#). The basis for these transfers is in Salesforce’s approved Processor Binding Corporate Rules and the SCCs.

Chapter One is aware of concerns raised by the Court of Justice of the European Union in respect to transfers of personal data to the USA and in response it has conducted a Data Protection Impact Assessment to satisfy itself that such transfers are lawful and that the data transferred is adequately protected.

When you consent to participate in the Online Reading Volunteers programme, the collection, international transfer, storage, and processing of your information will be undertaken in accordance with this Privacy Policy.

9. Information sharing

Chapter One may use your information in an aggregated and anonymised format in order to undertake statistical analysis or share reports with third parties. We may share some of your personal information with our partner schools, in order to coordinate volunteer-pupil pairings. We will not sell, distribute or lease your personal information to any other third parties unless we have your permission or are required by law to do so.

10. Web browsing and Cookies

Please see the relevant section of our Privacy Policy on our website for more information about web browsing and cookies.

11. Rights to control your information

Chapter One is committed to accommodating your rights under the General Data Protection Regulation, which include:

- Your **right to be fully informed** on how your information is processed by Chapter One. If you have any questions about the guidance provided in this document, or would like further detail on specific sections, then please address your query to the contact details provided.
- Your **right to access** the personal information Chapter One has recorded about you. If you require a copy of the personal data Chapter One has recorded about you, please make this request using the contact details provided and the information will be provided you in an electronic format as soon as possible, within one month at the latest. We will need to confirm your identity to provide this information.
- Your **right to rectify** the personal information Chapter One has recorded about you if it is inaccurate or incomplete. If you believe that any of the information we are holding on you is inaccurate or incomplete, please contact us as soon as possible using the contact details provided. We will promptly correct any information found to be incorrect.
- Your **right to erase** the personal information Chapter One has recorded about you. You may request the deletion or removal of the personal data Chapter One has recorded about you where there is no compelling reason for it to be kept. We may need to retain some specific information recorded at the volunteer application stage and during any voluntary activities with Chapter One - for examples, see section: "How we store, maintain and keep this information".
- Your right to **restrict or object** to the further use or 'processing' of your personal information by Chapter One. Please use the contact details provided to inform of us of any wish to restrict or object to the further use of your personal information. Note that we may need to retain some specific identifying information in order to respect your restriction or objection in future. To contact us in relation to any of the information contained in this policy notice, to make a complaint, or to pursue any of your rights under the General Data Protection Regulation, please email uksupport@chapterone.org; or alternatively contact our CEO at emma@chapterone.org
- Your right to **complain** about the processing of your personal information by Chapter One. You can register a complaint about our handling of your personal data with the Information Commissioner's Office, who are the UK's supervisory authority for GDPR. www.ico.org.uk/concerns

Change Record

Date of Change:	Changed By:	Comments:
July 2018		Policy approved by the Trustee Board
August 2020		Updates made after ECJ ruling and advice from Farrer & Co
October 2020		Updates following external advice and changes to website Privacy Policy
Jan 2023		Updates for Chapter One and digital ID