

## Overview

These guidelines are designed to support you as an RNLI volunteer to understand your responsibilities relating to data protection.

Data protection is the responsibility of all staff and volunteers across the RNLI and we all need to make sure that we are using personal and sensitive data in line with the law and holding it securely.

The following areas will be covered:

- General Data Protection Regulation (GDPR) – what does this mean?
- Retention of data – how long should information/data be kept for?
- Data breaches – what are your responsibilities under current legislation?
- Data rights – what are they and what do you need to know?

## General Data Protection Regulation (GDPR)

GDPR stands for General Data Protection Regulation. It is a new set of European regulations that came into force in the UK, Ireland, Isle of Man and the Channel Islands on 25 May 2018, representing the biggest change in data protection law in 20 years. GDPR focusses on six principles of data protection:

1. Data is lawfully processed
2. Data is collected for specified, explicit and legitimate purposes

3. Data is adequate, relevant and limited to what is necessary
4. Data is accurate and up to date
5. Data permits identification of data subjects for no longer than is necessary
6. Data is processed in a manner that ensures appropriate security of the personal data.

The Regulation will affect **all personal data** held and processed, whether by staff or volunteers.

Under GDPR, personal data has a very broad definition and includes information like name, address, email address and telephone number.

### What impact will I see as a volunteer?

In many ways GDPR is similar to previous data protection law (Data Protection 1998). However, there are a few key changes that you will need to make sure that you know about so you can change how you carry out your role, if necessary.

The impact on the RNLI could be very big if we get it wrong, including a possible financial penalty from the Regulator (the Information Commissioner's Office), damage to reputation and loss of supporter trust.

### Is GDPR something we have to do?

Absolutely! Generally we should be protecting data and using it properly anyway but the GDPR has tightened up the penalties and provides additional rights to individuals.

### Do I really need to worry about this?

All staff and volunteers have a responsibility for the data we access, collect, store or delete. It is really important that you are aware of these changes **so you can help the RNLI protect not only its data but also its reputation and supporter donations.**



## Retention of data

It's really important that the RNLI doesn't hold personal data for longer than required. In the table below you can see the different types or categories of data that the RNLI holds and gathers, how long we can hold it for and how it may affect you as a volunteer (please note when we refer to volunteer managers, this can include both staff and volunteers).

Categories of data	Retention period	Who this may affect
• <b>Expression of Interest Forms</b>	1 month after contact	All volunteers
• <b>Volunteer Application Forms</b> (unsuccessful applications) • <b>Volunteer Informal Chat notes</b> (unsuccessful applications) • <b>Selection Criteria Matrix</b> (unsuccessful applications)	1 year from date of application	Volunteer managers
• Volunteer Induction Forms: • <b>Volunteer Induction Checklist;</b> • <b>Volunteer Safety Checklist;</b> • <b>Commitment to Safeguarding Practices form;</b> • <b>Confidentiality and Responsible Use of Computers Form</b>	7 years after the volunteer leaves the role	Volunteer managers
• <b>Volunteer Reference Forms</b> • <b>Volunteer Review Forms</b> • <b>Volunteer Informal Chat Guidelines</b> (successful applications) • <b>Selection Criteria Matrix</b> (successful applications) • <b>Volunteer Application Forms</b> (successful applications) • <b>Consent Form for Under 18s</b> • <b>Volunteer Leaving Feedback Forms</b> • Any risk assessment relating to an individual volunteer, such as disability, young volunteer, DBS/PVG/Garda requirement, health issues etc. • Problem solving: any correspondence relating to volunteer issues and problem solving cases (this can be between staff with RNLI email addresses, as well as volunteers with private email addresses)	7 years after the volunteer leaves the role	Volunteer managers
• Volunteer names and contact details held on rotas (held in shops, fundraising groups and other volunteer groups)	As soon as the rota is out of date	All volunteers
• Volunteer names and contact details of a volunteer group (held by group leaders or individual members of a group)	List must be kept up to date and amended to delete members of the group as they leave	All volunteers
• List of local supporters, names, telephone numbers, addresses	• Business contact details (company names, email addresses etc.): fine to collect and retain • Opted-in individuals: as long as opt-in is valid • Others: don't store/collect	All volunteers
• Lists of local boat owners who we've previously had contact with for sea check/lifejacket check or similar	2 years after contact	Community safety volunteers
• Contact emails and telephone numbers for schools and youth groups	2 years after contact	Youth education volunteers
• Contact lists/spreadsheets of journalists	As soon as the relationship ends with the journalist	Volunteer lifeboat press officers
• Raffle/lottery slips	3 years from end of financial year (raffles) and 3 years from end of draw (lottery)	Any volunteer involved in raffles and lotteries
• Financial records	6 years from the end of the financial year	Treasurers or any volunteer involved with financial records
• AGM/event meeting minutes	Indefinitely. Discuss with our Heritage Team (heritage@rnli.org.uk) before disposal (possible historical significance)	Any volunteer involved in taking and keeping minutes

The above list may not cover all of the information you are holding so please contact your volunteer manager to discuss any other types of information.

## Data breaches

Everyone, including volunteers, has a duty to report data breaches involving personal and sensitive data to the RNLI's Data Protection Team. Under GDPR, the RNLI has to report data breaches to the Regulator (the Information Commissioner's Office) within 72 hours of the organisation becoming aware of the breach. If the RNLI becomes aware of a data breach and does not report to the Regulator within 72 hours, we could receive a financial penalty.

A personal data breach can happen for a number of reasons, for example:

- Loss or theft of data or equipment on which data is stored, or through which it can be accessed
- Loss or theft of paper files
- Inappropriate access controls allowing unauthorised/unnecessary access to data both at work and at home
- Human error
- Unforeseen circumstances such as a fire or flood

Further examples of a breach could include:

- Losing an RNLI laptop or encrypted USB device
- Allowing someone to access personal data that you're holding without reason for them to access it
- Losing paperwork or leaving paperwork on public transport
- Emailing the wrong person with a spreadsheet of personal data
- A member of the public being able to view contact lists or rotas in shops (unauthorised access)

It is really important that as soon as a personal data breach is **identified or suspected**, it is immediately reported to the Data Protection Team by emailing [data\\_protection@rnli.org.uk](mailto:data_protection@rnli.org.uk) and copying in your volunteer manager so they know what's going on too.

To help improve our understanding of the risks to data and address them before breaches occur, we would also encourage individuals to report 'near misses' (ie incidents which have almost resulted in a data breach except for an intervention or 'luck').

If you are in doubt as to whether it's a breach it is always better to report, no matter how small.

### Top Tips:

- Before you start to collect data be clear in your mind what you might use it for, what data you need for those uses and how long you need to keep it for
- Never collect more data than you need
- Always dispose of data securely once it has served its purpose; this includes shredding paperwork
- Make sure you think 'clear desk'. Who else can see the information being left accessible at your volunteering area? (For instance, in your lifeboat station, in your shop or at an event)
- When using spreadsheets or electronic methods to collate data, ensure they are password protected
- Always lock your computer screen or shut down your computer before you walk away or leave for the day. This will prevent others from accessing data
- Never share passwords or write them down
- If using hard copies to store personal data, ensure they are kept in a locked cabinet or desk
- If you don't have access to the RNLI's systems, please use an RNLI-issued encrypted USB to store data. For further information about how to order one of these devices, please speak to your volunteer manager.

If you have any queries or questions, or need advice on how to handle data, please contact your volunteer manager.





## Individual Rights under GDPR/ Data Protection

All individuals have rights under data protection whether they are volunteers, supporters, staff or members of the public. Anyone can make a request to the organisation to find out what information is held about them to help them decide if this is appropriate. This is sometimes called a Subject Access Request. Everyone, including volunteers, needs to know what to do in the event of being asked for such a request.

GDPR sets out a number of rights that individuals have; most have existed before, but a couple of new rights do now exist. Rights to be aware of are:

- An individual having the **Right of Access** to data being held about them
- The **Right to Object** to their data being processed
- The **Right to Erasure** – a request can be made for data being held to be deleted, subject to certain conditions being met.

It is important to send the request to the Data Protection Team ([data\\_protection@rnli.org.uk](mailto:data_protection@rnli.org.uk)) - this includes if you receive a Subject Access Request or if you believe you may be asked for any of the above. It is important to do this quickly as requests for information have to be responded to within one calendar month and the RNLI will have to locate the relevant information.

Thank you for helping us to be compliant with GDPR. If you have any questions, please speak to your volunteer manager or email the Data Governance team at [data\\_gov@rnli.org.uk](mailto:data_gov@rnli.org.uk).

