

Good Morning Project Ltd trade as Good Morning Service. We are committed to ensuring that your privacy is protected while providing you with a befriending and safety-net alert service.

Should we ask you to provide personal and/or sensitive personal information when communicating orally or in writing with our personnel then you can be assured that it will be used only in accordance with this privacy policy and in line with the principles of the Data Protection legislation.

This privacy policy explains what to expect when the organisation collects and processes personal information about you.

Who do we collect information about?

Why do we collect information about people?

What information do we collect about people?

Marketing and sharing

Transfer of data overseas

Retention

Security of your information

Client and Contact Databases

Website and Cookies

Notice of breach of security

Changes to our privacy policy

Your rights

Complaints

How to contact us

Who do we collect information about?

Good Morning Service collects information about our:

- Members
- People who attend our events
- Board of Trustees
- Suppliers including consultants and contractors
- Other contacts e.g. freelance journalists
- Photographs
- Financial information including expenses
- Volunteers
- Employees, former employees, job applicants

Why do we collect information about people?

Good Morning Service will collect personal and sensitive information about people for the following purposes:

- To provide a telephone befriending service
- To provide a safety-net alert service (if appropriate)
- To administer membership records
- To support our events
- To keep you informed about the work of the Good Morning Service
- To give you the opportunity to be involved in events, consultations, research, personal stories/case studies etc
- To send you information about third parties which we think you may find useful
- To improve the services we provide to people
- To influence and shape policy
- To manage our portfolio of work
- To publicise the work of the Good Morning Service
- To recruit
- To manage our employees and volunteers
- To administer and maintain our accounts
- To maintain our records

Registered Data Controller

Good Morning Service has been a registered Data Controller with the Information Commissioner's Office since 2003. Our registration number is Z828219X. We process information for the necessary performance of a contract e.g. to provide someone with Good Morning Calls befriending service and to report on the service performance to funding partners (e.g. the local authority or organisation who pay for the service to be delivered). Please note, this is the lawful basis for processing information and does not mean that an individual's identifying data is shared with funders.

What information do we collect about people?

Personal information collected may include your name, address, telephone number, e-mail address and criminal proceedings, outcomes and sentences, offences and alleged offences. We may also require sensitive personal information regarding any accessibility or dietary requirements you have and information regarding your health, gender, sexual life including orientation, race/ethnicity, political opinions, religious, personal life and philosophical beliefs. (If you are a client and receive Good Morning Calls, you may also tell us all of this information without us asking for it.)

If you are involved in focus groups, consultations, campaigns, awareness raising, personal stories/case studies, events etc, your opinion, feedback, comments, personal circumstances and photographs may be collected by the Good Morning Service. We may also capture your views on video or audio, depending on the activity. If we are filming or photographing an event, this will be made clear to all attendees in advance.

If you are involved in activity whereby your travel expenses may be reimbursed, we may require your bank details should you choose to be reimbursed electronically.

To become a client of Good Morning Service and use our befriending and safety-net alert service, we ask you about:

- your hobbies and interests so that we can find common ground to chat about and to give you information on events/ services that may be of interest to you.
- clubs and groups that you attend on a regular basis so that we can try to locate you there if you haven't answered our Good Morning Call and before we need to alert the Police (to ask the Police to make a welfare check visit.) We will tell you when we have had to ask someone else about your whereabouts and safety when we next speak to you.
- your physical and mental health so that we can understand what's important to you and how your condition may affect your ability to e.g. a) communicate, b) physically get to the phone, and we will give you information on events/services which may be useful to you.

We ask you to do a short questionnaire on your mental health so that we can ask you again in some months time to see if having GMS support has made any difference to your wellbeing.

We'll use the information gathered in the course of your application to join and during our service to you to report to funders anonymously i.e. without identifying you (unless you have given us express permission to use your first name and age). We do this because funders want to know the type of health conditions that people have that the funder pays GMS to provide them with support.

- your GP so that we can call them to try to locate you if you fail to answer our Good Morning Calls and, also if we have a serious concern about your wellbeing. We have asked you to give your written permission in a GP consent form for us to do this, of which your GP gets the original and we keep a copy. We will tell you when we have had to ask someone else about your whereabouts and safety when we next speak to you.
- any services that regularly come into your home because if you fail to answer our Good Morning Call we will try to verify your safety by calling that service e.g. a home carer who can check that your phone is not off the hook. We will tell you when we have had to ask someone else about your whereabouts and safety when we next speak to you.
- your nominated contact persons, if any, that we could pass on responsibility to check on your wellbeing if you fail to answer our Good Morning Call and we have not been able to locate you. We will tell you when we have had to ask someone else about your whereabouts and safety when we next speak to you.

When we speak to clients for the provision of our telephone befriending service we write a short summary of the main topics spoken about on our client database. We do this to help us get to know the person in order to build a meaningful relationship with them, i.e. a relationship where they feel that we know and understand them as an individual with their own characteristics, behaviours, thoughts and beliefs. We hope to find common interests that we can enjoy talking about.

We will provide emotional support and information to the person in whatever difficult time they are going through. We hope to help them to find their strengths and assets within themselves and the wider community where appropriate to help them come to terms with their situation.

Our aim is that people will not feel alone, that our clients will feel supported. It is up to each individual what we speak about; clients only tell us what they want to tell us.

We will use the information you provide as part of our befriending service to provide information to you about other relevant support services.

When you become a client we hope to get to know what makes you you. It is up to you what information you share with us.

Marketing and sharing

The Good Morning Service sometimes needs to share the personal information we process with the individuals themselves and with other organisations. Where this is necessary we comply with all aspects of the data protection legislation.

The Good Morning Service and its sub-contractors will not sell, distribute, lease or otherwise disclose your personal information to third parties unless we have your written permission, or are required by law to do so.

The Good Morning Service's sub-contractors may have access to personal data while operating our IT systems, including website, conducting our business or providing you with a service. However, in doing so, they will be bound by data protection legislation and the Good Morning Service's privacy policy.

Users of our website are notified when their information is being collected by any outside parties. We do this so our users can make an informed choice as to whether or not they should proceed with services that require an outside party.

Transfer of data overseas

We use third party sites such as Zoom to host board meetings and public events including our annual general meeting. These events are not designed to elicit personal information from participants, however, should you wish to register to attend these events you must be aware that Zoom.us transfers personal data, such as your IP address, to the USA and that any personal data you choose to share, outwith your IP address, will be transferred to a country that does not provide adequate data protection (in line with GDPR) and that no adequate safeguards aimed at providing protection for the data are being implemented.

Zoom is also used to record, edit and publish Good Morning Service live activity. Participants who consent to participate are subject to the same caveats as above.

The Good Morning Service use IT company, Southside Technology Ltd, to host its website and it's servers are based in the UK. Southside Technology Ltd have standard contractual clauses (in line with GDPR requirements) that, together with recognising the judicial authority of the UK, provide adequate safeguards for the processing of data.

The Good Morning Service may publish your personal stories etc. on our website and via social media. In doing so, this information will be transferred overseas and accessible worldwide. If you can be identified from the information your consent will be sought before publishing. (You might want to be identified but Good Morning Service reserve the right to not identify you.)

Our contact database and our IT servers are hosted internally in our own office by Good Morning Service with no public access and are bound by EU data protection legislation.

The client database is hosted on a local office Linux server. The database is accessed only by Good Morning Service staff, volunteers, and IT company Southside Technology Ltd, all of whom are bound by the data protection legislation and the Good Morning Service's privacy policy. There is no public access.

Retention

How long we retain your information will depend on the purpose of processing. Please read the relevant section.

Security of your Information

We are committed to ensuring that your information is secure.

To prevent unauthorised access or disclosure we have put into place physical, electronic and managerial procedures to safeguard and secure information we collect from you.

Physical Controls

All identifiable or confidential hard copy data/ filing is locked in storage cabinets with limited access.

Electronic Controls

All accounts are password protected accounts.

Any data stored on a PC is protected by the users login details i.e. username and password. Any data stored on the network stored device (GMNAS1/SPRUCE) is also protected by access control permissions, username and password, we may also password protect certain documents.

The Good Morning Service staff, sub-contractors can access their accounts remotely therefore removing the need for information to be saved to removable media or local hard drives.

It is prohibited to write personal information for which we do not have consent to make public to removable media and then remove the media from the office.

The Good Morning Service website is hosted via the internet and accounts are password protected.

Managerial Controls

Good Morning Service staff and volunteers are made aware of the data protection legislation and policies and procedures of the Good Morning Service at induction.

Client Data Base

The Good Morning Service's client database contains identifiable information of our members and nominated contact persons.

The client database is hosted by IT company Southside Technology Ltd. The database is accessed only by Good Morning Service staff and volunteer befriending staff (if any), and Southside Technology Ltd, all of whom are bound by the data protection legislation and the Good Morning Service's privacy policy.

Website

The Good Morning Service hosts a website here: www.goodmorningservice.co.uk which is maintained, hosted and secured by Southside Technology Ltd. The IP addresses of visitors to the website get logged routinely, and we may use a product such as Google Analytics to process the information.

Cookies

When users enter the Good Morning Service website their computers will automatically be issued with 'cookies'. Cookies are text files which identify users' computers to the Good Morning Service server. The website then creates "session" cookies to store some of the preferences of users moving around the website, e.g. retaining a text-only preference. Cookies in themselves do not identify individual users but identify only the computer used and they are deleted on departure from the website.

Many websites do this to track traffic flows, whenever users visit those websites.

The Good Morning Service website uses third-party cookies to measure use of the website including number of visitors, how frequently pages are viewed, and the city and country of origin of users. This helps to determine what is popular and can influence future content and development. For this purpose, the Good Morning Service may use a product such as Google Analytics to measure and analyse usage of the website. The information collected by the Good Morning Service will include IP address, pages visited, browser type and operating system.

Users can set their web browsers to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. The last of these means that certain personalised services cannot then be provided to that user.

Other Websites

The Good Morning Service website contains links to other sites. Please be aware that the Good Morning Service is not responsible for the privacy practices of such other sites. We

encourage our users to be aware when they leave our site and to read the privacy statements of every website that collects personally identifiable information. This privacy statement applies solely to information collected by the Good Morning Service.

Notice of Breach of Security

If a security breach causes an unauthorised intrusion to our system that materially affects the information we hold about you, we will notify you as soon as possible and later report what action we took in response.

Changes to our Privacy Policy

If we decide to change our privacy policy, we will post the updated privacy statement to the website and any other places we deem appropriate, e.g. the Good Morning Service newsletter, so our users are always aware of what information we collect, how we use it, and under what circumstances, if any we disclose it.

Your Rights

You have the right to:

- access your information
- withdraw consent to use of your information
- have inaccurate personal data corrected
- be forgotten
- request the restriction of processing
- data portability
- not be subjected to automated decisions and profiling
- lodge a complaint with the Information Commissioner's Office (ICO)

Access to your information (Subject Access Request)

Upon written request to the Good Morning Service, individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection legislation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to;
- for how long it will be retained and
- let you have a copy of the information in an intelligible form and portable form
- tell you if it has been transferred overseas and what safeguards were put in place
- tell you the source of the information if it did not come directly from you
- notify you of your right to have the information corrected, made complete or erased
- advise you of your right to complain to the Information Commissioner's Office

The Good Morning Service will provide you with this information within one month. The Good Morning Service can refuse to provide you with this information if we cannot do so

without disclosing personal information about another person or if your request is excessive.

To make a subject access request you should submit your request to:

Service Manager, Data Protection, Good Morning Service, G4, 110 Flemington Street, Glasgow, G21 4BF.

Withdraw consent to process

You should be aware that you can withdraw your consent to process at any time. If you are a client and you choose to withdraw consent to process we will end your membership of the Good Morning Service, no longer process your information (ie we will no longer contact you to provide a service) and we will delete your personal information in line with Good Morning Service's data retention policy.

If you have consented to your personal information being made public in reports, on social media or via any other channel, you must note that the Good Morning Service can only delete its future use of your information, unless it has another legal basis to justify holding on to your personal information.

Correction of inaccurate personal data

You have the right to have any inaccurate personal information held by the Good Morning Service to be corrected and you have the right for incomplete personal data to be made complete. The Good Morning Service encourages individuals to provide us with updates to their personal information in accordance with the purpose for processing.

Restriction of processing

You have the right to request the restriction of the processing of your information if you contest the accuracy or lawfulness of the personal data. Restriction means that the information can only be processed with your consent or in defence of a legal claim.

It also applies where you object to the processing and the Good Morning Service is considering whether its legitimate grounds override your individual rights or when processing is unlawful but you oppose erasure and request restriction instead.

Right to be forgotten/data erasure

The right to be forgotten entitles you to have your personal data erased, further dissemination of the data stopped and, potentially, have third parties halt processing of the data. The conditions for erasure include the data no longer being relevant to the original purposes for processing, or when the data subjects withdraw consent. These rights exist if there are no overriding legitimate grounds for processing e.g. the performance of a contract.

The Good Morning Service may notify any third parties to whom it disclosed the information of the changes to processing.

Right to Portability

The right to data portability allows individuals to obtain and re-use their personal data for their own purposes across different services.

The right to data portability only applies:

- to personal data an individual has provided to a controller;
- where the processing is based on the individual's consent or for the performance of a contract; and
- **where the processing is carried out by automated means.**

The personal data will be provided in a structured, commonly used and machine readable format. Examples of appropriate formats include CSV and XML files.

Automated Decision Making including Profiling

You have the right not to be subject to a decision based solely on automated processing, including profiling.

Complaints

Should you wish to complain about how Good Morning Service have handled any aspect of your personal data, you can contact us using the details below and/or by contacting the Information Commissioner's Officer (ICO) <https://ico.org.uk/concerns/> ([this link will take you away from our website](https://ico.org.uk/concerns/)) or write to them at:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF. Tel: 0303 123 1113

How to contact us

If you have any questions or suggestions regarding our privacy policy, please contact our Data Protection Officer at:

Telephone: 0141 336 7766

E-mail: info@goodmorningservice.co.uk

Post: **Service Manager, Data Protection, Good Morning Service, G4, 110 Flemington street, Glasgow, G21 4BF.**

It should be noted that the Good Morning Service's e-mail system is not encrypted and anyone sending personally identifiable information via e-mail should be aware of this.

Clients ie people who receive the Good Morning Service's telephone befriending and, if appropriate, the safety-net alert service

When you want to become a Good Morning Service client, we will request your name, address, telephone number, any physical and mental health conditions, date of birth,

gender, contact details of services that come into your home, your hobbies and interests, if appropriate your nominated contact person name, address and telephone number, the name, address and telephone number of your GP. It is up to you what, if any, information you provide to Good Morning Service.

If someone referred you to us we will hold the referrer's name, in what role that they are referring to us, the reason for their referral and their telephone number.

We'll send you by post our monthly newsletter and annual report. You can opt out of receiving either of these or both.

We then use this information to:

- provide you with the Good Morning Service befriending service
- provide you with the Good Morning Service safety-net alert service if appropriate
- administer your records
- give you the opportunity to be involved in consultations, research, personal stories/case studies
- send you information about third parties which we think you may find useful
- improve the services we provide to you
- influence and shape policy
- manage our portfolio of work

We will update this information for the duration of your membership. Should you cancel your membership we will delete your personal information after 24 months. Retaining the data for 24 months enables Good Morning Service to report on service level agreements or funding agreements for the differing reporting periods required by multiple funders. Individuals' identifiable data (i.e. first name and age only) is not provided unless the individual has given their express permission for it to be shared publicly including to funders.

People who attend our events

If you consent to attending one of our events, the Good Morning Service will collect your name, contact details, dietary and accessibility requirements.

Photographs may be taken at the event and used for publicising the event and the wider Good Morning Service portfolio. People attending the event are notified that photographs will be taken and can choose not to participate.

We may use this information to prepare a delegate list which will be shared by all those attending our events for networking purposes, to inform the venue of any accessibility and dietary requirements you may have, to invoice you for your fee (if applicable), to sign you up to workshops (if applicable) and to keep you informed about the event.

We may contact you after the event for feedback and to enquire whether you would like to receive any further information about or become more involved with the Good Morning Service.

Participants in focus groups/research/campaigns

If you are participating in any other Good Morning Service activity such as focus groups, viewpoints, podcasts, opinion pieces, competitions, case studies, social reporting, surveys,

campaigns etc. The Good Morning Service will obtain your consent before processing your information.

How your information is handled will depend on each activity and will be in accordance with the consent provided by you.

If we are working with another organisation and need to provide your information to them, you will be notified of this prior to your giving consent.

You should ensure that you understand prior to giving your consent how your information will be used and with whom it will be shared.

You can withdraw your consent at any time but should be aware that if the information is to be made public via reports and social media, the Good Morning Service will be able to only withdraw its future use of your personal information. It will not be able to remove the information from materials and channels already in circulation.

Information collected for these types of activity may be personal and sensitive personal data. You may be asked for your name and contact details, about your condition(s), how you self manage etc.

The information may be used in reports, newsletters, campaign materials, as training materials, published on social media and our website etc. These may be shared with Government, Parliament, other third sector organisations, the public, our members, event delegates etc. and will be shared internationally.

Whether you will be identifiable from the information will depend on the consent that you provided e.g. if you appeared in a video you will be identifiable from your appearance. If you provided a personal story, blog or viewpoint, for example, you may be identifiable from the content, or from your name if you consented to this, and if you completed an online survey your IP address will have been collected by the third party survey site. Other information may not be explicitly identifiable, however, the Good Morning Service cannot guarantee this.

Your personal information will be retained in accordance with the consent you provided. Information that you have consented to being made public will be retained permanently.

Photographs

The Good Morning Service may take photographs at events, for case studies, publications, website, social media, promotion or marketing purposes both printed and online.

If we are taking your photograph as part of a case study or campaign then we will require to have your consent prior to taking the shots.

If we are taking photos for a legitimate business reason e.g. as part of a large event, such as an annual general meeting, group befriending session (monthly get-together) or awards ceremony, and you do not wish to be photographed you will be advised in advance to notify the Good Morning Service that you do not want to be photographed. You may also notify the Good Morning Service and photographer on the day of the activity, if you do not want to be photographed. The Good Morning Service will ensure notification is openly displayed at any such event.

You may notify us at any point if you wish us to stop using your image, in which case it will not be used in any future publications but will continue to appear in publications and social media channels already in circulation.

The Good Morning Service will retain photographs permanently.

Other Contacts

If we are holding your personal information for legitimate business reasons e.g. if you are a media contact and we may wish to contact you to highlight Good Morning Service business, we will hold your information indefinitely and will check it annually for accuracy.

Board Members

When you volunteer to join the Good Morning Service board we will require some basic information from you including your name, membership number, position, organisation you work/ed for, correspondence address and a short biography.

If you are successful we will require to know your title, forename(s), surname, former name(s), country of residence, nationality, date of birth, business occupation, service address, residential address and role at Good Morning Service. This information is required by Companies House.

Companies House will make public your name (former names), date of appointment, country of residence, nationality, date of birth, role and service address and, once you resign, your date of resignation.

The Good Morning Service will post your name on our website together with whether you are an office bearer.

We are required to keep a register of directors which your details will remain on for the duration of your tenure and then for 10 years further tax years following your resignation date.

Suppliers including consultants and contractors

For the performance of our contract with you, we will request details of suppliers names, addresses, mobile phone numbers and bank details. While most of this information will relate to an organisation, there will be occasions where it is also the individuals' home address and personal mobile number.

This information will be kept for 6 years following the tax year in which it was collected.

Finance including expenses

If you have chosen to attend a "charged for" activity and you have elected to be invoiced for the payment, we will require your postal address to issue the invoice.

If we have agreed to reimburse your associated travel and subsistence expenses, and you have chosen to be paid electronically, we will require your bank account name, sort code

and account number. If you have chosen to be paid by cheque, we will require your postal address.

This information will be kept for 6 years following the tax year in which it was collected.

Job Applicants, employees and former employees

When individuals apply to work at Good Morning Service, we will request your name, address, telephone number, e-mail address, recruitment history, education, referees, personal statement, whether you consider yourself to be disabled, your accessibility requirements, your right to work in the UK, whether you are registered with a PVG scheme, and whether you are facing any charges for offences or have a criminal record. This information is required for the performance of the contract into which you are taking steps to enter.

We will also request that you complete an equal opportunity form which collects information on your gender, sexuality, age, employment status and ethnic origin. This is not mandatory information; if you choose not to provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including line managers. We will use the information you supply to us to produce and monitor equal opportunities statistics.

If you have indicated that you consider yourself to be disabled, we will ask if you have any accessibility requirements in order that we can make any reasonable adjustments for your interview and, if you are the successful candidate for your employment.

Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing you beforehand, unless the disclosure is required by law.

Application forms may, on some occasions, be shared with external interviewers who are involved in short-listing candidates for interview and participating in interviews.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed and deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

Once a person has taken up employment with the Good Morning Service, we will require to collect additional information for normal employment purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are working for us, at the time when your employment ends and after you have left. This includes using information to enable us to comply with the employment contract, to comply with any legal requirements, pursue the legitimate interests of the Good Morning Service and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as Disclosure Scotland.

The sort of information we hold includes your application form, your contract of employment and any amendments to it; correspondence with or about you, for example letters to you about a pay rise or, at your request, a letter to your mortgage provider confirming your salary; information needed for payroll, benefits and expenses purposes; contact and emergency contact details; records of holiday, sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

You will, of course, inevitably be referred to in many Good Morning Service documents and records that are produced by you and your colleagues in the course of carrying out your duties and the business of the Good Morning Service.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your job and whether any adjustments to your job might be appropriate. We will also need this data to administer and manage statutory and Good Morning Service sick pay.

Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Other than as mentioned below, we will only disclose information about you to third parties if we are legally obliged to do so or where we need to comply with our contractual duties to you, for instance we may need to pass on certain information to our external payroll provider, pension or childcare voucher schemes.

Your personal data will be stored for the entirety of your employment and for a further six tax years to comply with financial and legal requirements.

Some personal data will be shared with third parties such as Scottish Training Foundation who provide our payroll service, HMRC, Disclosure Scotland and solicitors.

If in the future we intend to process your personal data for a purpose other than that which it was collected we will provide you with information on that purpose and any other relevant information.

Volunteers (except Board members)

When individuals consent to volunteer at the Good Morning Service we will use the information provided by you to process your application. When individuals apply to volunteer at Good Morning Service, we will request your name, address, telephone

number, e-mail address, recruitment history, education, referees, personal statement, whether you consider yourself to be disabled, your accessibility requirements, whether you are registered with a PVG scheme, and whether you are facing any charges for offences or have a criminal record. This information is required for the performance of the contract into which you are taking steps to enter.

We will also request that you complete an equal opportunity form which collects information on your gender, sexuality, age, employment status and ethnic origin. This is not mandatory information; if you choose not to provide it, it will not affect your application. This information will not be made available to any staff outside of our recruitment team, including line managers. We will use the information you supply to us to produce and monitor equal opportunities statistics.

If you have indicated that you consider yourself to be disabled, we will ask if you have any accessibility requirements in order that we can make any reasonable adjustments for your interview and, if you are the successful candidate for your employment.

Where we want to disclose information to a third party, for example where we want to take up a reference or obtain a 'disclosure' from the Criminal Records Bureau we will not do so without informing you beforehand, unless the disclosure is required by law.

Personal information about unsuccessful candidates will be held for 12 months after the recruitment exercise has been completed, it will then be destroyed and deleted. We retain de-personalised statistical information about applicants to help inform our recruitment activities, but no individuals are identifiable from that data.

If you are unsuccessful in finding a suitable volunteer role with the Good Morning Service, we will hold your personal information for 12 months from the date you applied and then it will be destroyed or deleted.

If you are successful, we will compile a file relating to your volunteering. The information contained in this file will be kept secure and will only be used for purposes relevant to your volunteering.

Once a person has taken up a volunteer position with the Good Morning Service, we will require to collect additional information for normal volunteering purposes. The information we hold and process will be used for our management and administrative use only. We will keep and use it to enable us to run the business and manage our relationship with you effectively, lawfully and appropriately, during the recruitment process, whilst you are volunteering for us, at the time when your position ends and after you have left. This includes using information to enable us to comply with the volunteering contract, to comply with any legal requirements, pursue the legitimate interests of the Good Morning Service and protect our legal position in the event of legal proceedings. If you do not provide this data, we may be unable in some circumstances to comply with our obligations and we will tell you about the implications of that decision.

Much of the information we hold will have been provided by you, but some may come from other internal sources, such as your manager, or in some cases, external sources, such as Disclosure Scotland.

The sort of information we hold includes your application form, your contract of volunteer position and any amendments to it; correspondence with or about you; information needed

for company benefits and expenses purposes; contact and emergency contact details; records of sickness and other absence; information needed for equal opportunities monitoring policy; and records relating to your career history, such as training records, appraisals, other performance measures and, where appropriate, disciplinary and grievance records.

Where necessary, we may keep information relating to your health, which could include reasons for absence and GP reports and notes. This information will be used to comply with our health and safety and occupational health obligations – to consider how your health affects your ability to do your volunteer role and whether any adjustments to your role might be appropriate.

Where we process special categories of information relating to your racial or ethnic origin, political opinions, religious and philosophical beliefs, trade union membership, biometric data or sexual orientation, we will always obtain your explicit consent to those activities unless this is not required by law or the information is required to protect your health in an emergency. Where we are processing data based on your consent, you have the right to withdraw that consent at any time.

Once you have ceased to volunteer with the Good Morning Service, we will retain the file for 24 months to allow us to report to multiple funding partners on service provision.