

Employee and Volunteer Privacy Notice – Rainbows Hospice for Children and Young People

Rainbows takes the privacy of your personal data very seriously. When you work for or volunteer for us, we want you to be assured that your personal data is protected.

Please read this privacy notice carefully, as it contains important information on who we are and how and why we collect, store, use and share your personal data.

It also explains your rights in relation to your personal data and how to contact us or the UK's data protection authority the Information Commissioner's Office (**ICO**), if you have a complaint about how we process your personal data.

This privacy notice applies to all existing and former employees or volunteers and includes anybody who works/volunteers for Rainbows on a non-permanent basis or temporary basis, and other third parties engaged to carry out work for us and who have access to our premises or internal systems (collectively referred to in this privacy notice as "**you**", "**employee**" and/or "**volunteer**").

This categorisation is for convenience and does not indicate any particular employee, volunteer or other status.

The controller of your personal data is Cope Childrens Trust (**Rainbows Hospice for Babies, Children and Young People**), a company registered in England under company number 02743297 with its registered office at Lark Rise, Fairmeadows Way, Loughborough, Leicestershire, LE11 2HS (referred to in this privacy notice as "**we**", "**us**" or "**Rainbows**").

If you have any questions about this privacy notice or how we process your personal data, please contact our Data Protection Officer (**DPO**) us using the details below:

by email to: peopleteam@rainbows.co.uk

by post to: Lark Rise, Fairmeadows Way, Loughborough, Leicestershire, LE11 2HS

We regularly review this privacy notice and will update it where necessary, and we will always inform you of any important changes.

This privacy notice was last updated on 8 December 2025

If you would like to receive a copy of any previous versions, please contact our DPO at peopleteam@rainbows.co.uk

What personal data do we collect about you?

Throughout your time at Rainbows, we will collect and process personal data about you. This includes the following information:

- a) basic contact details including; your full legal name, telephone number, personal email address, and postal address;
- b) CV containing your full work or education history*;
- c) references from previous employer(s), education establishments, or character references for volunteers;
- d) A DBS check;
- e) Date of birth;
- f) Images (photos and CCTV);
- g) details of salary and benefits, bank/building society, national insurance number and tax information*;
- h) Personal car details, such as registration number, driver's license and motor insurance;
- i) your nationality and immigration status*;
- j) details of your spouse/partner and any dependants;
- k) details of your pension arrangements, and all related personal data*;
- l) details of your working/volunteering patterns, attendance, and leave requirements;
- m) performance reviews, appraisals, probation review, and improvement plans*;
- n) details of professional development training*;
- o) details of any training undertaken at Rainbows;
- p) qualifications and professional memberships*; and

- q) personal data about your use of our IT, communication, and other systems.

Personal data identified with an * applies to employees only.

What is our lawful basis for using your personal data?

When Rainbows processes your personal data, we must have a lawful reason to do so under data protection legislation (“**lawful basis**”).

The table below sets out the personal data we collect and use about you and the lawful basis we rely on.

You are required to provide certain personal data, and we have identified the personal data below with an“*”. If you do not provide this personal data, we may not be able to employ you, pay you, provide occupational and statutory benefits or engage with you as a volunteer.

Personal data processed	Volunteer, employee	Purpose of processing	Lawful basis
Basic contact details including full legal name; telephone number; personal email address; and postal address*	Employees	To enter into an employment contract with you	Contractual necessity
	Volunteers	To set up a volunteering agreement with you	Legitimate interests: to set out our expectations for volunteers
	Volunteers and employees	To enable us to send you updates or contact you whilst you are employed or volunteering (includes out of hours contact)	Legitimate interests: to be able to communicate with you

			and provide useful information relating to Rainbows or your role
	Employees	To enable us to send you any legal or regulatory changes that may affect you, for example changes to tax regulations or pensions	Legal obligation
	Employees and Volunteers	To send you flowers, a gift or card, to your home address, to show our sympathy and support during a difficult time or to congratulate you on a major milestone. We will only share your home address with a limited set of employees, that will be facilitating the request	Legitimate interests: to foster a relationship with our employees and volunteers and show support where required
Name of emergency contact, their relationship to you and contact details	Volunteers and employees	To enable us to contact someone on your behalf in the event of an emergency	Legitimate interests: to take appropriate action in the case of an emergency
Date of birth*	Volunteers and	To ensure that Rainbows	Legal

	employees	complies with working time regulations	obligation
	Volunteers	To send you a birthday card to you home address	Legitimate interests: to build strong a relationship with volunteers
	Volunteers	To ensure that you are the minimum age to volunteer for Rainbows	Legitimate interests: to ensure our volunteers are the right age to volunteer for us.
Photo image*	Volunteers and employees	To provide you with photographic ID, which will be used to identify you when you are working/volunteering at the Hospice, shop or visiting another site	Legitimate interests: to ensure individuals only have access in the Hospice where they are entitled to, based on your role. To show their identify if working outside of

			the Hospice
	Volunteers and employees	To include you in any Rainbows promotional material	Consent
CV and full work history and references from previous employer(s), education establishments, professional certificates and memberships*	Employees	To have a full oversight of your previous skills experience and ensure you are only carrying out a role you are qualified and experienced to do so.	Contractual necessity
Proof of professional membership *(Qualified healthcare roles only)	Employees	To ensure that you are fit to practice in your chosen qualified profession	Legal requirement
Details of salary and benefits, bank/building society, national insurance number, and tax information*	Employees	To pay you your salary and annual leave	Contractual necessity
	Volunteers and employees	To pay any approved expenses	Contractual necessity
	Employees	To allow Rainbows to meet legal requirements around tax and payment reporting	Legal obligation
Car registration details, driving licence and motor insurance details	Volunteers and employees	To approve expenses relating to driving your personal car	Contractual necessity
Car registration	Volunteers and	To manage access to the	Legitimate

details	employees	Hospice carpark and ensure access to emergency services	interests: to ensure that those parking at the Hospice have authorisation and the emergency services have access at all times
Your nationality and immigration status and personal data from related documents, such as your passport or other identification and immigration information*	Employees	To be satisfied and demonstrate that you can legally work for Rainbows in the UK	Legal obligation
Details of your pension arrangements, and all personal data included in these *	Employees	To administer your pension benefits	Legal obligation Legitimate Interests: to be able to facilitate any occupational pension benefits above legal

			requirements .
	Employees	To comply with our auto-enrolment pension obligations	Legal obligation
Details of your working patterns, attendance and leave requirements *	Employees	To ensure we are meeting Working Time Regulations requirements, and you are taking/planning sufficient rest breaks and annual leave	Legal obligation
	Employees	To meet flexible working time requests made by you	
	Employees	To ensure you are meeting the working hours set out and agreed in your contract of employment	Contractual necessity
	Volunteers	To have a general oversight of the hours worked by volunteers	Legitimate Interests: to allow Rainbows a general oversight of volunteering hours
Performance reviews, appraisals, probation review and improvement plans*	Employees	To continually assess your suitability to perform your role and offer the chance for additional training and promotion	Legitimate interests: to maintain employment records to comply with corporate governance

			obligations and good employment practice
Details of professional development training	Employees	To record and manage training taken by employees	Legitimate interests: to maintain employment records and to comply with legal, regulatory, and corporate governance obligations and good employment practice, to ensure safe working practices
	Volunteers and employees	To record and demonstrate that mandatory training is taking place	Legal obligation
Personal data about your use of our IT, communication, telephone, email and other systems *	Volunteers and employees	To protect our networks, and personal data of employees and suppliers, against unauthorised access or data leakage	Legitimate interests: to protect our commercial, technical and personal
	Volunteers and employees	To ensure our internal policies, such as those	

		concerning security and internet use, are adhered to and to ensure that commercially sensitive information is kept confidential	data
	Volunteers and employees	To check that restrictions on your activities that apply after your employment/volunteering has ended (post-termination restrictions or restrictive covenants) are being complied with	
	Volunteers and employees	To be used as part of investigations by regulatory bodies, or in connection with legal proceedings or requests	Legitimate interests: to maintain employment records to comply with corporate governance obligations and good employment practice
CCTV Images	Volunteers and employees	To provide a safe and secure environment at our Hospice and shops and to maintain appropriate records in the event that we need to commence	Legitimate interests: To provide a safe and secure environment

		,respond to or manage any legal proceedings or requests for footage	for our visitors and to maintain appropriate records in the event that we need to commence, respond to or manage any legal proceedings or requests for footage
Time of entering and leaving the Hospice and date attended	Volunteers and employees	To have a full oversight of who is on site at the Hospice in the event of an emergency	Legal requirement
	Employees	To provide factual information regarding an employee's attendance and presence at the Hospice in a disciplinary/investigation	Legitimate interests: to maintain employment records to comply with corporate governance obligations and good employment practice

Special category data

From time to time, it will be necessary for Rainbows to collect and process more sensitive personal data about you.

Special category data includes details of medical history, ethnicity or special requirements you may need due an ongoing health condition. This will enable us to;

- a) make any reasonable adjustments in your workplace;
- b) monitor workforce levels within the teams,
- c) pay you the required sick pay and support your return to work as required;
and
- d) monitor and support equality and diversity.

If you require any further information regarding the processing of special category data, please contact peopleteam@rainbows.co.uk

Disclosure and Barring Service

All clinical employees, and certain roles where there is unsupervised contact with children will meet the criteria for "regulated activity" set out within the Rehabilitation of Offenders Act (ROA) 1974 (Exceptions) Order 1975 (access to standard DBS certificates) and by the Police Act 1997 (Criminal Records) regulations (access to enhanced DBS certificates) and will be subject to an enhanced check.

Where employees or volunteers do not meet the criteria for Regulated Activity, they will undergo a standard check if they are based in a children's hospice.

All employees and volunteers will be subject to background screening checks as stated by the Quality and Care Commission.

Sharing your personal data with third parties

It will be necessary for Rainbows to share your personal data with third parties in order to assist with your employment/volunteer cycle and the operational running of the charity.

The categories of third parties with whom we will share your personal data with includes:

- a) our payroll provider;
- b) our HR platform provider;
- c) our pension providers;
- d) our benefits providers;
- e) our volunteer system provider;
- f) IT services providers;
- g) regulatory or law enforcement agencies;
- h) DBS platform;
- i) Trustees;
- j) professional advisors, such as lawyers and accountants;
- k) our training providers/online training platform providers;
- l) prospective/previous employers (reference purposes); and
- m) potential purchasers of some or all of our business or on a re-structuring.

When we share your personal data with third parties, we only permit them to process your personal data for specified purposes in accordance with our instructions. We require all third parties to respect the security of your personal data and to treat it in accordance with data protection laws and the recipient of the personal data will be bound by confidentiality obligations.

Keeping your personal data secure

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way.

We limit access to your personal data to those who have a genuine business need and those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with a suspected personal data breach. We will notify you and any relevant regulator of a personal data breach where we are legally required to do so.

How long do we keep your personal data for ?

We will keep all personal data, obtained during your time as an employee or volunteer, for no longer than is necessary and provide details below:

Employees

Personal data	Trigger point	Retention
Payroll data	Termination of employment	6 years
Employee and personnel file records	Termination of employment	6 years
Maternity/paternity/adoption data	Termination of employment	6 years
Recruitment data	Termination of employment	6 years
National minimum wage data	Termination of employment	6 years
Sick pay (statutory)	Termination of employment	6 years
Retirement benefit schemes	Termination of employment	6years

Volunteers

Personal data	Trigger point	Retention
Volunteer and personnel file records	Termination of the volunteering arrangement	6 months

Transferring data overseas

In some cases, we may need to transfer personal data outside of the United Kingdom (**UK**).

Where this is the case, we will only share the minimal amount of personal data necessary for the purpose of processing and, where possible, we will share the personal data in an anonymised form.

Whenever we transfer your personal data outside of the UK, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- a) We may transfer your personal data to countries for whom there has been an adequacy decision by the UK Secretary of State (as applicable) confirming that the country provides an adequate level of protection for personal data;
- b) we may use specific contracts approved by the UK Secretary of State which give personal data the same protection it has within the UK. When we rely on this measure, we will ensure that the third party can comply with the provisions of such contracts, and we have confirmed that the country to which the personal data is transferred provides enforceable data subject rights and effective legal remedies for data subjects are available there; or
- c) a specific exception applies under applicable data protection law.

Please contact peopleteam@rainbows.co.uk if you would like further information about the specific mechanism used by us when transferring your personal data overseas.

Your Data Subject Rights

Under data protection laws you have the following rights:

- a) **Request access** to your personal data. This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- b) **Request correction** of the personal data that we hold about you. This enables you to have any incomplete or inaccurate personal data we hold about you corrected.
- c) **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have exercised your right to object to processing (see point d below).
- d) **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about

your particular situation which makes you want to object to processing on this ground.

- e) **Request the restriction of processing** of your personal data. This enables you to ask us to suspend the processing of personal data about you, for example if you want us to establish its accuracy or the reason for processing it.
- f) **Request that your personal data is sent to another controller** (the right of portability). In certain circumstances, you have the right to get your personal data from us in a way that is accessible and machine-readable, and you also have the right to ask us to transfer your personal data to another organisation. This does not apply to all of your personal data, only personal data that you have provided to us, and which is held electronically. We only have to comply with this right if it is technically feasible to provide this personal data in a commonly used format, for example, a CVS file.

If you wish to exercise any of your data subject rights, please contact peopleteam@rainbows.co.uk

In most cases we will deal with your request as soon as possible and at the latest within one calendar month of the date the request was received. If we need to extend the time period for responding to your request, we will let you know within the one-month period. We do not charge a fee for any such requests unless there are exceptional circumstances.

How to complain

We hope that we can resolve any query or concern you raise about our use of your personal data, and we will always respond to all complaints raised regarding the use of your personal data.

However, if you do not feel we have addressed your concerns or data subject rights appropriately, you can contact the ICO at ico.org.uk or via telephone on 0303 123 1113 for further information about your rights and how to make a formal complaint.