

## National Volunteer Police Cadets- Privacy Notice/Data Policy

The Volunteer Police Cadets (VPC) as the recognised uniform youth group for British Policing is subject to the General Data Protection Regulation (GDPR) along with all other organisations in European Union. GDPR strengthens your privacy rights on the collection and use of your personal data, and makes it easier for you to access information which we hold and to which you may be entitled.

This privacy notice lets you know what happens to any personal data that you give the Volunteer Police Cadets, or any data that we may collect from or about you. It tells you what rights you have over your personal data and what you can do about it if you wish to exercise any of those rights. This privacy notice covers the use of our recognised electronic secure cadet management system and is relevant to all users of this system and those of whom details are held within this system of which are managed at Force level by each force who uses this system. Any force who does not use this system must have relevant processes and procedures in place for managing personal data.

- 1. Why do we process personal Information? Consent and Public Interest for Safeguarding.
  - **1.1)** Safeguarding our young people
  - 1.2) Keeping our leaders safe
  - **1.3)** Track progress and demographic data via national anonymised statistical data.
- 2. We obtain, hold, use and disclose personal information for these purposes
  - **2.1)** In the case of cadets, personal information is supplied at point of application to their local force who will process the application. If the applicant is successful then their details will be input into the Volunteer Police Cadets preferred cadet management system (Marshall Volunteer Portal). If the application is unsuccessful the application will be destroyed or retained for a period of no longer than 6 months.
  - **2.2)** In the case of leader applications personal information is supplied at the point of application to their local force, however they will be subject to more stringent and rigorous checks to ensure safe recruitment when working with young people within a regulated youth activity. A successful applicants details will be input into the Volunteer Police cadets electronic management system (Marshall Volunteer Portal).



**2.3)** The personal information held in the Marshall Volunteer Portal (MVP) Is used to for the following reasons at Force level with each force being responsible for the data within:-

- Personal and ICE details for both cadets and leaders
- Cadets Health & Permission form signed by parent/carer
- Safe planning & management of events and activities
- Enable safe and auditable communication between leaders and cadets
- Maintain training records for leaders and cadets
- Enable tracking of attendance at events and hours committed
- Maintain Vetting & DBS records for leaders
- Keep parents & carers up to date via electronic communications

2.4) At a National level personal information held in the MVP is used for the following reasons only:-

To keep our leaders up to date via email with national updates, training and other VPC related opportunities. Anonymised statistical data such as demographic data Membership survey data which is completed by consent and anonymous

**2.5)** The VPC website- A public facing site that does collect cookies when visited. Cookies are used on this website to ensure a more personalised experience and improve user experience. We use cookies to store user preferences, they are not used for identification purposes. We use cookies on the website for Google Analytics - This cookie helps us accurately estimate the number of visitors to the website and helps us have a better understanding of how visitors use our website. We ask for user consent to set this cookie in your browser.

Any news stories, pictures and other relevant content is uploaded to the website which is maintained and managed by the VPC National team, these are shared by all Forces that operate a VPC who should ensure relevant permissions are sought from those featured within. Potential cadets and volunteer leaders are also able to submit an expression of interest via this site by selecting their local force, the enquiry generated will go direct to the selected force, a history of submitted expressions of interest is also maintained in the back end of the VPC website which is limited personal data Name, age, email address, phone number, Town/City. In the case of expression of interests the VPC National team may send comparative data to each force to establish progress of any potential applicants. If you have any questions relating to the VPC website or this privacy notice please email <a href="mailto:vpc.admin@vpc.police.uk">vpc.admin@vpc.police.uk</a>

## **Managing Cookies**

The cookies we use will be sent to your browser and then stored in the cookies directory on your computer. To find out how to reject, delete or update your cookie preferences in your browser you need to know what browser you use and what version of it you have. Most browsers have guidelines on how to adjust cookie settings, use the 'Help' menu to find out this information.

You can learn more about managing cookies at AboutCookies.org



We do not attempt to monitor the browsing behaviour of individual users through any hidden means.

- **3.** What type of personal data is it? The personal data recorded on the system at the point of onboarding in the case of a Cadet is as follows:-
  - Email address
  - Name
  - Date of Birth
  - Address
  - Phone number
  - Health & Permission record
  - Date Joined
  - Gender
  - Ethnicity
  - Religion
  - Force Number (Optional)
  - Preferred Language (Optional)
  - **3.1** Also in the case of a cadet the system holds the following details of parent/carer(s) 1&2 (where applicable) for emergency contact, necessary permissions and keeping up to date:-
    - Name
    - Relationship
    - Email address
    - Address
    - Contact phone numbers
    - Preferred language
- **3.2** In the case of any other role on the system that is a leader role or above the following information is recorded and held within the system for purposes of safe management, record keeping, keeping up to date and safe communication with cadets, parents and leaders:-
  - Email address
  - Name
  - Date of Birth
  - Address
  - Emergency Contact details
  - Gender
  - Ethnicity
  - Religion
  - Date joined



- Position held ie Police Officer, Police Staff, Special Constable Police Support Volunteer
- **3.3** A leader will also as part of the onboarding process electronically sign the VPC code of conduct, the system will also be used to record and maintain VPC relevant training records and vetting/DBS records. All roles of Unit leader and above do have access to cadet records within their unit/force for safe management of their VPC. The VPC National team will maintain training records of all leaders that attend Nationally delivered training which will contain Name, Email address, date of attendance. The training attendance of any attendee will be shared with the relevant force in order to ensure local records are updated accordingly.
- **3.4** Any user record can be transferred to another force at the request of the user to their local force and in agreement with the receiving force.
- **3.5** When any user leaves the VPC scheme irrespective of role within the system the local force will close and then delete the account. Once deleted record details are no longer visible but are retained in the background of the system for a period of 7 years in line with General Data protection rules of data retention.
  - 4. Where do we get personal data from? Personal data outlined above is obtained from the users themselves and in many cases input into the system by that user, in some instances the data required is taken from an application form and input into the system by the local force. In the case of cadets, data relating to Health & Permission is obtained and signed off by the parent/carer completing the form.
  - 5. How do we handle your personal information? –We handle personal information according to the requirements of the UK Data Protection Act. Your personal information held on our management system Marshall Volunteer Portal, a secure system which is accessed by registered users only in each force or unit, this is password encrypted and each user has an individual login. We will ensure that your personal information is handled fairly and lawfully with appropriate justification. We will only use your information for lawful purposes in connection with membership of the Volunteer Police cadets and will not share your information with any third party. We will strive to ensure that any personal information used by us or on our behalf is of the highest quality in terms of accuracy, relevance, adequacy, not excessive is kept as up to date as possible and is protected appropriately. We will regularly review the system to ensure it is accurate and up to date and any record will be closed and deleted when a user leaves the Volunteer Police Cadets.
  - 6. Who do we share your personal information with? In the case of cadets & parents/carers we will share your information with leaders and authorised senior users at a force and unit level for purposes of safeguarding, keeping up to date, planning of events and for use in emergency contact. In the case of leaders we will share your information at a Force & National level with senior authorised users overseeing the VPC in order to ensure records are kept up to date, maintaining updates and contact, planning events and for use in emergency



contact, your details will also be shared with vetting departments and the disclosure barring service to ensure that the correct checks are undertaken in order to safeguard young people in line with operating a regulated youth activity. It may in some cases for all users be necessary to share information with Police, Social services, NHS trusts and other relevant bodies with regard to any safeguarding concerns or other lawful purpose.

7. How do we keep your personal information safe? The VPC is the recognised uniform youth group of British Policing as outlined in our National strategy <a href="https://vpc.police.uk/about-us/national-vpc-strategy-2020-2024/">https://vpc.police.uk/about-us/national-vpc-strategy-2020-2024/</a> The Volunteer Police Cadets takes the security of all personal information under our control very seriously. We will comply with the relevant parts of the legislation relating to security, and seek to comply with the <a href="College of Policing Information Assurance authorised practice">College of Policing Information Assurance authorised practice</a>, and relevant parts of the ISO27001 Information Security Standard. All personal information will be held within our recognised secure portal known as Marshall Volunteer Portal to which authorised users only have access, this system meets appropriate industry and government security standards. In the case of any force that chooses not to use this system, they must ensure that they have relevant practice and procedure on place for the storing of personal information.

All forces will carry out regular audits and inspections, to protect manual and electronic information systems from data loss and misuse, and only permit access to them when there is a legitimate reason to do so. Each Force is responsible for their own data and as such should manage this effectively and efficiently to ensure all personal information contained within the system is kept up to date and weeded as appropriate. These procedures are reviewed regularly to ensure our security of information is kept up-to-date. All information must be:

- processed fairly and lawfully
- collected for specified, clear and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- processed securely
- **8.** Your Rights?- You have certain rights under GDPR, which you can ask the Data Controller to deal with, although each Force manages its own data the National VPC are responsible for the overall management of the VPC website and the Marshall Volunteer Portal so if you have any questions about your data email <a href="mailto:vpc.admin@vpc.police.uk">vpc.admin@vpc.police.uk</a>. To make things easy for you, there are forms to explain how you can do this.
  - You have the right to be informed about the processing of your personal information
  - The right to restrict processing of your personal information



- The right to have your personal information erased
- The right to request access to your personal information and to obtain information about how we process it
- The right to move, copy or transfer your personal information
- Rights in relation to automated decision making which has a legal effect or otherwise significantly affects you.
- Further details can be found on the ICO website https://ico.org.uk
- You have the right to lodge a complaint to the Information Commissioner's Office (ICO). The ICO is the UK's supervisory authority responsible for providing guidance, direction and enforcement of data protection laws. Contact details are at <a href="https://ico.org.uk">https://ico.org.uk</a>
- 9. How long will you keep my personal information? Your information will be retained and accessible for as long as you are a member of the Volunteer Police Cadets. When any member irrespective of role leaves, their details and record will be retained accessible but invisible on the system for a period of 7 years in line with retention of data General data protection rules. Although this data will be archived it may be retrieved if required for any lawful purpose pertaining to any Policing purpose or safeguarding concern.
- **10. Policy documents** safeguarding policy and associated guidance <a href="https://vpc.police.uk/about-us/safeguarding-statement/">https://vpc.police.uk/about-us/safeguarding-statement/</a>
- 11. If you want to raise a concern with the Supervisory Authority The <u>Information</u>

  <u>Commissioner</u> is the independent Authority responsible within the UK for ensuring we comply with data protection legislation. If you have a concern about how we have used your personal information or you believe you have been adversely affected by our handling of your data you may wish to contact them using the information below:

The Information Commissioner's Office, Wycliffe House, Wilmslow, Cheshire, SK9 5AF

**Telephone**: 0303 123 1113

Email: casework@ico.org.uk

**12.** Version update- We may need to change or update our privacy notices from time to time to reflect ICO guidance or changes in the law. We keep our Privacy Notice under regular review.



This Privacy Notice was last updated on 10<sup>th</sup> December 2020 and will be reviewed every 2 years.

If we plan to use your personal information for a new purpose we will update our Privacy Notice and communicate the changes before we start any new processing