



VOLUNTEER HANDBOOK

SEPT 2021

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Welcome to Justlife, a message from our CEO

I would personally like to extend a warm welcome to Justlife, we are delighted that you have decided to give your time and skills to volunteer as part of our team. Volunteers play an important part in our work supporting people in and around homelessness and temporary accommodation and we are really grateful to you for joining us, I hope it is an enjoyable and rewarding experience.

Justlife was established in east Manchester in 2008 and from humble beginnings we have seen continued, and steady growth. As you may already know we have projects in Manchester and Brighton as well as our wider national work which sits within our Research, Policy and Communications Team.

Our mission is that people's experience of temporary accommodation is short, safe and healthy.

At Justlife we value the importance of working *together* to explore the best ways to operate our services, overcome difficulties and embrace new opportunities. Team work is a key principle for Justlife and we hope that you will benefit from working with others in the organisation as well as tackling the role which you are personally undertaking.

I am personally involved with each of our projects both in Brighton, Manchester and our national work also and so I have regular contact with all our team members. I very much look forward to getting to know you as we try to make a difference for our beneficiaries and the wider community.

We hope that your time with us will be an enjoyable and rewarding experience.

Yours Faithfully,

A handwritten signature in black ink, appearing to read 'S. Gale'.

Simon Gale, CEO

INTRODUCTION

Volunteers enrich the experience for people who use the Justlife service to ensure their experience of unsupported temporary accommodation is as short, safe and healthy as possible. We value the time, skills and expertise of each volunteer and we are committed to providing a meaningful and rewarding experience for all volunteers.

To ensure we recruit, support and engage our volunteers well we have our volunteer policy which you can find below. The policy sets out the principles and practice by which we involve volunteers and is relevant to staff, volunteers and trustees within the organisation. It aims to create a common understanding, ensure fair and equal treatment and to clarify roles and responsibilities to ensure the highest standards are maintained in relation to the management of volunteers.

Hopefully the Volunteer Policy and other policies found in this handbook will give you lots of information you may need to help you carry out your role with us, we do ask that you read the full document before you start and refer back to it if you need to while you are volunteering with us and please do ask any questions if anything is unclear or not covered here.

POLICIES

1. VOLUNTEER POLICY

Roles and Responsibilities

- 1.1. A Justlife Volunteer is someone who freely gives their time, effort, and talent in order to contribute toward the mission, vision, and values of Justlife, without concern for financial gain.
- 1.2. We actively seek to offer voluntary roles to those with lived experience of unsupported temporary accommodation or homelessness including those who currently use our services.
- 1.3. This policy applies to all Justlife volunteers, additional support may be provided for those with lived experience, and some restrictions may apply on types of volunteering available.
- 1.4. The development and co-ordination of voluntary activity within the organisation, including volunteering policies and procedures and the welfare of volunteers is the responsibility of the Senior Management Team.
- 1.5. The volunteer role is based on trust and mutual understanding. There is no enforceable obligation, contractual or otherwise, for the volunteer to attend or to undertake particular tasks or for the organisation to provide continuing opportunities for voluntary involvement, provision of training or benefits. However, there is a presumption of mutual support and reliability. Reciprocal expectations are acknowledged – both of what the organisation expects of volunteers and what volunteers expect of the organisation.
- 1.6. The organisation expects volunteers to:
 - Be reliable and honest
 - Uphold the organisation's values and comply with organisational policies

- Make the most of opportunities given, e.g. for training
 - Contribute positively to the aims of the organisation and avoid bringing the organisation into disrepute
 - Carry out tasks within agreed guidelines
- 1.7. Volunteers can expect to:
- Have clear information about what is and is not expected of them
 - Receive adequate support and training
 - Be insured and to volunteer in a safe environment
 - Be treated with respect and in a non-discriminatory manner
 - Receive out of pocket expenses
 - Have opportunities for personal development
 - Be recognised and appreciated
 - Be able to say 'no' to anything which they consider to be unrealistic or unreasonable
 - Know what to do if something goes wrong
- 1.8. Justlife recognises how important it is to consider your views and ideas and also keep you aware of what is happening and developments in the workplace.
- 1.9. The main source of information will be your supervisor.

Relationships at Work

- 1.10. This policy covers all volunteers of Justlife. It is intended to provide guidance in areas where personal relationships overlap with working relationships and ensure individual volunteers/staff are not open to allegations of improper behaviour, bias, abuse of authority and/or conflict of interest.
- 1.11. Justlife recognises that when people work together, they may form friendships or close personal relationships. Justlife does not interfere with such personal friendships and relationships providing volunteers continue to behave in an appropriate, professional, and responsible manner at work.
- 1.12. If a volunteer begins a relationship with a service user, beneficiary, supplier or contractor and there is a risk, or perceived risk, of abusing authority then the relationship must be declared to your supervisor as soon as possible.

Conduct while on Organisation Business

- 1.13. Justlife generally asserts that volunteer activities outside of normal working hours and off its premises are a personal matter and do not directly concern Justlife; however, there are some exceptions.
- 1.14. Justlife will get involved in incidents that occur at:
- Organisation parties and events or other work-related social occasions whether they are organised by Justlife or by its employees.
 - Any social occasion organised by beneficiaries or service users where a volunteer has been invited in the capacity as a representative of Justlife.
 - Work-related training events, seminars, or conferences.

- Any other events volunteers attend while working away on business on behalf of Justlife.

Equality & Diversity

- 1.15. It is our policy not to discriminate against any individual on the basis of their colour, race, nationality, ethnic or national origin, religion or belief, sexual orientation, gender (including gender reassignment), marital or civil partnership status, age, disability, pregnancy or maternity, trade union membership or part/fixed term status.
- 1.16. Justlife values the contribution of everybody regardless of background.
- 1.17. We will demonstrate our commitment to diversity and equality by:
- 1.18. Aiming to build a volunteer team that reflects the community in which we work
- 1.19. Developing opportunities for people who use or have used our service to volunteer
- 1.20. Treating volunteers, staff, people who use our service and partners fairly & with respect
- 1.21. Recognising and valuing the differences and individual contribution that people make
- 1.22. We expect all volunteers to have an understanding of and commitment to equality and diversity. Justlife has a full Equality & Diversity Policy which is made available to all volunteers through the shared online folder.
- 1.23. Our goal is to ensure that these commitments, reinforced by our values, are embedded in our day-to-day working practices with all our clients, colleagues, and partners.

Volunteer Recruitment Process

- 1.24. We are committed to ensuring that volunteer opportunities are open to everyone and are committed to anti-discriminatory practice in line with our Equality and Diversity Policy.
- 1.25. All volunteers are required to complete the following recruitment procedure before being able to volunteer.

Application Form

- 1.26. Volunteers will need to complete a simple application form. We will provide assistance to any potential volunteers who need help to complete the form.

Interview

- 1.27. The potential volunteer will be invited to Justlife for an informal interview; this will provide both parties with an opportunity to find out what role is best suited for the individual. If there is a selection process, then volunteers will be made aware of this at the outset.
- 1.28. It might be the case that we have to turn down a volunteer for the role they applied for. This is normally a joint decision reached by discussion between the applicant and the staff member. If appropriate, the staff member will try to find an alternative role within the organisation, or signpost the applicant to somewhere more suitable.

References

- 1.29. In order to ensure the protection of the people we work with, volunteers will need to provide two references. At least one reference should be either professional or academic. Second references should not be a family member and should be people a volunteer has known for at least 6 months.
- 1.30. A volunteer placement may only start on receipt of two satisfactory references. If a volunteer role requires specific qualifications or accreditations, proof of these will also be required (such as a driving licence or a professional qualification).

Criminal Records Checks via the Disclosure and Barring Service (DBS)

- 1.31. A criminal records check is required for some volunteer roles in line with current legislation. Having a criminal record will not necessarily prevent someone from volunteering. Convictions are to be declared at application and each declaration will be dealt with on a case by case basis.

Induction, Training & Support

Induction

- 1.32. All volunteers will receive an induction into the organisation, their team and their specific role. This will include:
 - Organisation overview including our aims and values
 - Introduction to role and duties and what support & communication is available
 - Introduction to staff and volunteers
 - Project information
 - Introduction to volunteer & organisational policies
 - Health and safety briefing
 - Volunteer agreement
- 1.33. Volunteers will receive an Introduction to Volunteering document that will introduce them to the organisation's aims and objectives as well as the relevant policies and procedures and all the practical information they will need to know.

Training

- 1.34. Instruction, guidance and support will be provided for every volunteer to carry out their role effectively. Training will be offered as relevant to the volunteer role and to support each volunteer's personal development.

Support & Supervision

- 1.35. All volunteers will have a named person as their Volunteer Supervisor, who will act as their main point of contact during their volunteering. This person will be available to discuss any issues and provide advice and guidance when needed.
- 1.36. Arrangements vary according to the volunteer and the role undertaken, and may include telephone support, group meetings or one to one reviews.

Trial Period

- 1.37. New volunteers must have a trial period unless the role is short term or one off. Six weeks is recommended as a suitable period but this may be extended if felt necessary.
- 1.38. After the trial period, the volunteer will receive feedback from the volunteer supervisor and discuss suitability for the role and recommend continuation as a volunteer. This is an opportunity for the volunteer to provide feedback to the volunteer supervisor and discuss progress: how things have been going, what went well, what could be improved, and review any support that may be needed.
- 1.39. Justlife reserves the right to end the volunteer placement at any time and will always do so respectfully and with clear and open communication.

Expenses

- 1.40. Justlife will reimburse volunteers for any out of pocket expenses incurred while carrying out the role, such as travel (during the volunteering but not to and/or from the placement and the volunteer's home) or refreshments. Speak to your volunteer supervisor before spending and they will approve and explain how you can be reimbursed.

Health and Safety

- 1.41. Volunteers are covered by Justlife's Health & Safety Policy. Volunteers play a key role in maintaining Health & Safety and are required to report near misses, potential hazards and incidents to their Volunteer Supervisor.
- 1.42. Volunteer supervisors must ensure that appropriate action is taken to ensure a safe working environment is created at all times and that volunteers are aware of any steps needed to reduce risks while they carry out their role.

Data Protection

- 1.43. We keep the information collected from the volunteer recruitment on our online database in accordance with our Data Protection Policy, our Privacy Statement and our Confidentiality Policy.
- 1.44. If you would like to see a copy please ask our Data Protection Officer, Andy Morris on andy@justlife.org.uk.
- 1.45. If you are concerned about the way your information is being handled or you wish to notify us of a change to your information please contact the Data Protection Officer on andy@justlife.org.uk.
- 1.46. We will make every effort to ensure that your concerns are addressed, however, you have the right to complain to the Information Commissioners Office.
- 1.47. Volunteer recruitment records will be held on a computerised database for 12 months following the end of the recruitment process. After which this data will be removed from our records. This data is subject to the either (prior to 25 May 2018) the Data Protection Act 1998 or (from 25 May 2018) the General Data Protection Regulation (EU 2016/679) (GDPR), or any other data protection laws and regulations applicable in England and Wales from time to time.

Confidentiality

- 1.48. Volunteers are bound by the same confidentiality requirements as paid staff. Please refer to the confidentiality policy for further details.

- 1.49. In some volunteering positions, the need for confidentiality is particularly high. Volunteers will be made aware of all issues in relation to confidentiality and may be asked to sign a confidentiality agreement when relevant.

Problem solving

- 1.50. The organisation aims to treat all volunteers fairly, objectively and consistently. It seeks to ensure that volunteers' views are heard, noted and acted upon promptly. We will attempt to deal with any problems informally and at the earliest opportunity.
- 1.51. Volunteers do not have the same legal rights as employees and we do not wish to create a legal contract between Justlife and volunteers. Nevertheless, it is important that problems or complaints are dealt with fairly, openly and consistently. To help with this, there are procedures to deal with any problems that may arise. There is a complaints policy in the shared online folder.
- 1.52. If a volunteer has a complaint about the organisation, a member of staff or another volunteer:
- In the first instance, most issues should be able to be resolved informally through communication and discussion with the Volunteer Supervisor.
 - If this is not the case, the volunteer should raise the matter with the Volunteer Supervisor's manager.
 - If the complaint is against either the Volunteer Supervisor or their manager, then the volunteer should request a meeting with the next appropriate manager.
 - If the issue is not resolved then it should be put in writing following the Complaints Policy.

If there is a problem with a volunteer's performance:

- 1.53. Many performance issues are simply due to training needs, a lack of support, or inappropriate roles and performance and role satisfaction will be regularly reviewed during supervision.
- 1.54. Where informal measures are not enough or there are ongoing concerns, the Volunteer Supervisor or their Manager will raise the issue in a formal meeting with the volunteer. The volunteer will be entitled to respond and give their thoughts and feedback.
- 1.55. If it is felt necessary an informal warning may be issued, with steps agreed to improve conduct.
- 1.56. If the issue is still not resolved a meeting involving the volunteer, their Supervisor and their manager will be called. This may result in a formal warning, with the understanding that following another warning the volunteer will be asked to leave.
- 1.57. If a volunteer is believed to have behaved in a manner that has or could have seriously affected the organisation – for example theft, bullying, or violence – they will be immediately suspended while the matter is investigated by the Volunteer Supervisors Manager or the appropriate senior manager.
- 1.58. The volunteer will be able to respond, and a decision will be made and communicated in writing within 14 days.
- 1.59. If the complaint against the volunteer is upheld they will be excluded from volunteering.

- 1.60. In all cases volunteers have the right to be accompanied at meetings on these issues by a volunteer, member of staff or friend.
- 1.61. Volunteers can appeal decisions to the senior management group, and will receive a response within 14 days. All complaints will be treated confidentially and if made in good faith, will not jeopardise that person's position within Justlife.
- 1.62. Records of all meetings held as part of this procedure will be stored on the volunteer's file. Such files are securely stored in accordance with the Data Protection Act 1998.

Communication, Consultation & Feedback

- 1.63. The way in which Justlife will keep volunteers informed about any organisation news and upcoming activities will be discussed at the induction as it will vary depending on the role.
- 1.64. Volunteer supervisors in each team will also endeavour to communicate information to volunteers and, where relevant, volunteers may also attend team meetings. Volunteers are always encouraged to provide feedback and share views about Justlife to their supervisor.

Moving On / Leaving

- 1.65. Volunteers are requested to notify their volunteer supervisor or the Volunteer Manager if they are leaving Justlife. This will allow Justlife to keep up to date volunteer records, thank them for their contribution, and to ask for feedback about the volunteering experience.
- 1.66. We are happy to provide a written reference to volunteers who have been with the organisation for three months or more up to two years following their exit.

2. ALCOHOL AND DRUG POLICY

- 2.1. Justlife understands that volunteers could develop alcohol or drug related problems for a number of reasons. However, alcohol and drug misuse or abuse can be a serious problem within the workplace and Justlife has a duty to protect the health, safety and welfare of all its volunteer and employees.
- 2.2. The rules in this policy apply to drugs that are unlawful under criminal law; they do not apply to prescribed medication. The aim of the rules is to promote a responsible attitude to drink and drugs and to offer assistance to volunteers who may need it.
- 2.3. However, if a volunteer is prescribed drugs by a doctor which may affect their ability to perform their role at Justlife, then they should discuss this with their supervisor.

Advice and counselling

- 2.4. Justlife aims to deal with volunteer's alcohol or drug related problems constructively and sympathetically.
- 2.5. If a volunteer has, or suspects they have, an alcohol or drug problem then they should speak to their supervisor who will be able to provide advice and guidance on

how to seek suitable treatment. The aim of the discussion will be to help volunteers with the problem in a way that is as compassionate and constructive as possible. Any discussions on the nature of an employee's alcohol or drug problem and the record of any treatment will be strictly confidential unless the volunteer agrees otherwise.

Ban on alcohol and drug consumption in the workplace

- 2.6. Alcohol or drugs must not be bought or consumed on Organisational business or premises at any time.
- 2.7. If a volunteer is representing Justlife at business/service user functions, conferences or attending social events organised by Justlife, even when outside of normal working hours, the volunteer is expected to be sensible if drinking alcohol and to take specific action to ensure they are within the legal limits if driving. Volunteers are banned from taking drugs on these occasions.
- 2.8. Social drinking outside working hours and away from Justlife's premises is a personal matter.

3. GIFTS FROM SERVICE USERS/SUPPLIERS POLICY

- 3.1. Justlife's aim is always to ensure beneficiary and service user satisfaction. Occasionally, satisfied beneficiaries, service users or other third parties may seek to reward employees with gifts.
- 3.2. Whilst Justlife has no desire to stop deserving volunteers receiving a small token of gratitude from a satisfied beneficiary or service user, there is the potential for abuse. In addition, certain suppliers or contractors may offer "reward schemes" which allow volunteers to obtain vouchers in return for ordering services or products on behalf of Justlife from that supplier or contractor. Justlife needs to be sure its suppliers and contractors are competitive and that's its volunteers are acting in the best interest of Justlife when using a particular supplier or contractor.
- 3.3. Justlife does not believe it is appropriate for volunteers to accept anything of greater value than small tokens of appreciation from beneficiaries, service users, suppliers, contractors or from any other person or organisation with which Justlife has, or might have, business connections. This is because it is important to ensure that no volunteer acts in a way that is inconsistent with the integrity of the business by accepting a gift in circumstances where it could influence, or be seen to influence, that volunteers decisions or actions in their role.
- 3.4. If you are offered/receive a gift, you must report this to your supervisor as soon as possible.

4. WHISTLEBLOWING POLICY

- 4.1. The Public Interest Act 1998 protects workers who 'blow the whistle' about wrongdoing by Justlife. It describes the kinds of disclosures which may be

protected; the circumstances in which such disclosures are protected; and who may be protected.

- 4.2. These rules are intended to comply with the Act and encourage volunteers/employees to make disclosures about fraud, misconduct or wrongdoing to Justlife, without fear of reprisal, such as dismissal or unfair treatment, so that problems can be identified, dealt with and resolved.

Key principles

- Be aware of the importance of eliminating fraud or wrongdoing at work. Report anything that you become aware of that is illegal.
- You will not be victimised, subjected to a detriment or dismissal for raising a legitimate matter under this procedure.
- Victimisation of an volunteer/employee for raising a qualifying disclosure under this procedure is a disciplinary offence for employees.
- Covering up someone else's wrongdoing is also a disciplinary offence for employees. Never agree to remain silent about a wrongdoing, even if told to do so by a person in authority.
- Finally, maliciously making a false allegation is a disciplinary offence for employees.

Protection

- 4.3. The Act provides protection for employees from being subjected to detriment by Justlife if they make a 'protected disclosure'.

What is detriment?

- 4.4. A detriment can take many forms, such as dismissal, denial of promotion, facilities or training opportunities which Justlife would otherwise have offered.

What are qualifying disclosures?

- 4.5. Qualifying disclosures are disclosures of information which you reasonably believe to show one or more of the following matters is either happening now, took place in the past, or is likely to happen in the future:
- A criminal offence;
 - The breach of a legal obligation;
 - A miscarriage of justice;
 - A danger to the health and safety of any individual;
 - Damage to the environment; or
 - Deliberate covering up of information tending to show any of the above five matters
- 4.6. Your belief must be reasonable, but it does not have to be correct. It might be discovered, after investigation, that you were wrong, so you must be able to show

that you held the belief in good faith and that it was reasonable to hold it in the circumstances. It is not your responsibility to investigate the matter; that is Justlife's responsibility.

How to make a disclosure

- 4.7. In order to qualify for protection, there are specified methods of disclosures, or procedures, which you must follow in order to disclose one of the above matters.
- 4.8. Justlife encourages you to raise your concerns using the following procedure. This procedure applies to all employees/volunteers. In addition, all agency workers and contractors are encouraged to use it.

The procedure

- 11.8.1. If you wish to make a qualifying disclosure you should report the situation to your supervisor. If you do not wish to speak to your supervisor, you can speak to another manager.
- 11.8.2. The disclosure should be made promptly so that investigation can take place and any action can be taken as soon as possible.
- 11.8.3. All qualifying disclosures will be treated seriously and as part of the investigation you will be interviewed and asked to provide a written witness statement setting out the details of your qualifying disclosure and the basis for it.
- 11.8.4. Confidentiality will be maintained during the investigation as far as it is practical and appropriate in the circumstances. However, in order to effectively investigate a disclosure, Justlife must be able to find out the individuals who should be informed or interviewed about the disclosure. Justlife reserves the right to arrange for another manager to conduct the investigation other than the manager you initially raised the matter with.
- 11.8.5. Justlife will invite you attend at least one meeting at a reasonable time and place at which your disclosure can be discussed. You should take all reasonable steps to attend that meeting and you have the right to be accompanied by either a trade union official or a colleague of your choice.
- 11.8.6. Once the investigation and meeting has taken place, you will be informed in writing of Justlife's conclusions and decisions as soon as possible. You will also be notified in writing of your right to appeal against Justlife's decision if you are not satisfied with it. Justlife is committed to taking appropriate action for all qualifying disclosures which are upheld.
- 11.8.7. If you wish to appeal against Justlife's decision, you must do so in writing within five working days of Justlife's decision. A more senior manager (who may not be the person to whom you addressed your appeal) will make arrangements to hear your appeal. At that meeting you may be accompanied by either a trade union official or a colleague of your choice. You should take

any reasonable steps to attend the appeal meeting. Following the meeting, you will be informed in writing of Justlife's final decision on your appeal; this decision will be final and binding.

- 11.8.8. You will not be penalised for raising a qualifying disclosure even if it is not upheld, unless the complaint was both untrue and made in bad faith.
- 11.8.9. Once Justlife's conclusions have been finalised, any necessary action will be taken. This could include either reporting the matter to an appropriate external government department or regulatory agency and/or taking internal disciplinary action against relevant members of staff. If no action is to be taken, the reasons for this will be explained to you.
- 11.8.10. At the end of this process, if you reasonably believe that appropriate action has not been taken, you may then report the matter to the appropriate authority in good faith. The Act sets out a number of prescribed bodies or persons to which qualifying disclosures may be made. However, Justlife encourages all volunteers/employees to raise their concerns directly in the first instance, rather than externally. This enables issues to be dealt with promptly and speedily.

A list of prescribed bodies or persons, the description of the matters for which they are prescribed and contact details, is available on <https://www.gov.uk/government/organisations/department-for-business-innovation-skills> (formally the DTI).

5. EQUAL OPPORTUNITY POLICY

- 5.1. Justlife is committed to being an equal opportunity recruiter and firmly believes in treating all applicants fairly and equally. Justlife also has a separate equality, diversity, and inclusion policy.

Commitment

- 5.2. As such Justlife will do its best to only evaluate applicants on the basis of their ability, competencies, experience and qualifications. At no point will factors (known as protected characteristics) regarding race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability be a part of any such decisions.
- 5.3. Justlife will do its best to ensure that the working environment is free from bullying and harassment of any kind. Particularly in relation to factors regarding race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability.

- 5.4. As a volunteer you are obliged to uphold the elements of this policy in order to play your part in making sure that the workplace is free from discrimination, bullying or harassment.
- 5.5. Justlife will not tolerate any act of bullying or harassment from its volunteers/employees, service users, suppliers or other parties who interact with the business.

Consequences of action

- 5.6. You should be aware that committing an act of discrimination or harassment may result in a civil case being brought against you and that acts of serious harassment can be also regarded as a criminal offence.
- 5.7. You have a responsibility to report any issue of suspected discrimination, bullying or harassment to your supervisor. It is not appropriate to become involved in the situation or to discriminate against fellow colleagues who has made an allegation or had allegations made against them. Management will deal with it appropriately.

6. RECRUITMENT ADVERTISING AND SELECTION

- 6.1. Justlife is committed to fair and equitable practices in recruitment and selection and will endeavour to apply its equal opportunities policy during the process. The main aim of Justlife is to appoint the most appropriate person for the role, based on competencies, experience, relevant qualifications and ability.

Advertising

- 6.2. Advertisements will encourage applications from all suitably qualified and experienced people. When advertising a volunteer opportunity, in order to attract applications from all sections of the community, Justlife will, as far as possible:
 - Ensure advertisements are not restricted to publications that would exclude or unreasonably reduce numbers of applicants on the basis of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability.
 - Avoid any unnecessary requirements which would exclude a higher proportion on the basis of race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability.

Selection

- 6.3. Short listing, selection and interviewing will be carried out fairly and consistently in line with the requirements of the role.

- 6.4. Appointment of a new volunteer will be based on their suitability for the role and their ability to meet the required standards either immediately or after a period of training.
- 6.5. Where a disabled applicant is identified, Justlife will follow correct procedures to make reasonable adjustments to facilitate them at interview and beyond to ensure that they are not put at a substantial disadvantage to a non-disabled applicant.
- 6.6. Where it is necessary to assess whether personal circumstances will affect the performance of the role, this will be discussed objectively, without detailed questions based on assumptions about race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability, children and/or domestic obligations and how they might impact on the individuals performance in the role.

7. BULLYING AND HARASSMENT POLICY

- 7.1. Bullying and harassment spoil the working environment and can have a devastating effect on the health, confidence, morale and performance of those affected by it.
- 7.2. All volunteers/employees are entitled to a working environment which respects their personal dignity and is free from such offensive conduct.
- 7.3. Justlife does not condone any form of bullying or harassment, whether by volunteers/employees or by outside third parties who do business with Justlife.

Definitions

- 7.4. Bullying is offensive or intimidating behaviour or an abuse or misuse of power which undermines or humiliates an employee.
- 7.5. Harassment occurs where, on the ground of the volunteer's/employee's race, colour, ethnic origin, nationality, national origin, religion or belief, sex, sexual orientation, gender reassignment, age, pregnancy, maternity, marital or civil partnership status or disability, a person engages in unwanted conduct that:
 - Has the purpose of violating the volunteer/employees dignity at work, or of creating an intimidating, hostile, degrading, humiliating, or offensive work environment for the volunteer/employee; or
 - Is reasonably considered by the volunteer/employee to have the effect of violating his or her dignity at work, or of creating an intimidating, hostile, degrading, humiliating, or offensive work environment for the volunteer/employee, even if this effect is not intended by the person responsible for the conduct.
- 7.6. Conduct may be harassment whether or not the person intended to offend. Something intended as a "joke" or as "office banter" may offend another person.

This is because different employees find different levels of behaviour acceptable and everyone has the right to decide for themselves what behaviour they find acceptable to them.

- 7.7. Behaviour which a reasonable person would realise would be likely to offend a volunteer/employee will always constitute harassment without the need for the volunteer/employee having to make it clear that such behaviour is unacceptable, for example, touching someone in a sexual way.
- 7.8. It may not always be clear in advance that certain behaviour will offend a particular volunteer/employee, for example office banter and jokes. In these cases, the behaviour will constitute harassment if the conduct continues after the volunteer/employee has made it clear, by words or conduct, that such behaviour is unacceptable to him or her. A single incident can amount to harassment if it is sufficiently serious.
- 7.9. Harassment also occurs where, on the grounds of the volunteer's/employee's rejection of or submission to unwanted conduct, as detailed above, a person treats the volunteer/employee less favourably than he or she would treat him or her had he or she not rejected, or submitted to, the unwanted conduct.

Examples

- 7.10. Bullying and harassment may be verbal, non-verbal, written or physical. Examples of unacceptable behaviour include the following:
 - Physical conduct such as welcome touching, patting, pinching, brushing against another person's body;
 - Any form of physical threat or intimidation;
 - Unwelcome lewd comment, innuendo or sexual advance;
 - The offer of rewards for submitting to sexual advances;
 - Threats for rejecting sexual advances;
 - "Outing" a lesbian, gay, bisexual, or transgender person;
 - Unsolicited questions about a person's sex life or sexual orientation;
 - Demeaning comments about a person's appearance;
 - The use of patronising titles or nicknames, especially relating to a person's protected characteristics;
 - Unwelcome jokes, banter or abusive language which refers to a person's protected characteristics;
 - The use of obscene gestures, leering or whistling;
 - The open display of pictures or objects with sexual or racial overtones, even if not directed at any particular person;
 - Spreading malicious rumours or insulting someone;
 - Picking on someone or setting him/her up to fail;
 - The spreading of malicious rumours or gossip;
 - Isolation or non-cooperation at work;

- Purposely excluding someone from social activities; and
- Any other conduct that denigrates, ridicules, intimidates or is physically abusive of an individual or group, including stalking.

Action

- 7.11. With cases of bullying or harassment, Justlife encourages volunteers who believe they are being harassed or who witness it to notify the offender (by words or conduct) that their behaviour is unwelcome.
- 7.12. Justlife recognises that actual or perceived power and status differences may make confrontation difficult or impractical.
- 7.13. Justlife takes bullying and harassment very seriously and if you believe you may be the victim of bullying or harassment, or have witnessed it, and have been unable to stop it by words or conduct, or you feel unable to do so, you should raise the matter with your supervisor.
- 7.14. Justlife will always take such complaints seriously and investigate the matter promptly and feedback to you in line with the grievance procedure.

8. HEALTH & SAFETY AT WORK POLICY

- 8.1. Justlife is committed to health, safety and welfare of all its volunteers and to maintaining best practice standards.
- 8.2. Justlife aims to provide and maintain a healthy and safe working environment with no, or minimal, instances of occupational accidents and illnesses. To achieve this, aim Justlife will:
 - Assess any risks to the health and safety of volunteers and identify any measures that need to be taken in order to comply with health and safety obligations
 - Provide safe means of workplace access and egress
 - Ensure the workplace is well maintained, in a safe condition and provides adequate facilities and arrangements for welfare at work
 - Provide and maintain equipment and systems of work that are safe for volunteers
 - Make arrangements for volunteers with regards to the use, handling, storage and transport of articles and substances
 - Provide any necessary information, instructions, training and supervision to ensure the health and safety of volunteers and other persons on Organisation premises
 - Actively promote cooperation from volunteers to ensure health and safety systems work
 - Establish appropriate emergency procedures as required
 - Monitor and review the management of health and safety at work

- Keep the health and safety policy under review, update it as required and inform volunteers of changes
- 8.3. The health and safety policy needs the full cooperation of volunteers. They are expected to ensure the policy is applied and to take reasonable care for their own safety and that of others. Volunteers are expected to:
- Comply with any safety instructions and directions issued by Justlife
 - Take reasonable care of their health and safety and that of other people who may be affected by the volunteer's acts or omissions at work and by observing applicable safety rules
 - Cooperate with Justlife to ensure that the aims of the Health and Safety Policy are achieved and any duty or requirement on Justlife by or under any of the relevant statutory provisions is complied with
 - Report and cooperate in the investigation of all accidents and incidents that have led to or may lead to injury. Use equipment or protective clothing provided in accordance with the training and instruction received
 - Report any potential risk or hazard or malfunction of equipment to the appropriate authority
- 8.4. Volunteers have a responsibility to observe all safety rules and to cooperate with the manager who has responsibility for putting into practice this policy and to take reasonable care of themselves and others.
- 8.5. Justlife also recognises its duty to protect the health and safety of all visitors to Justlife.

9. DRIVING OWN VEHICLE WHILE ON ORGANISATION-RELATED BUSINESS POLICY

- 9.1. This policy must be read in conjunction with the relevant Health & Safety Policy and Risk Assessments. Where a conflict between the two exists, the Health & Safety Policy documents take priority.
- 9.2. If a volunteer uses their own vehicle for business reasons then they must ensure it is in good repair, in roadworthy condition and it is serviced at the recommended intervals (in line with the vehicle logbook and mileage record).
- 9.3. Regular checks should include, but are not limited to:
- Tyre tread and pressure
 - Lights
 - Brakes
 - Fuel
 - Oil
 - Water coolant
 - Screen wash
 - Battery

Insurance

- 9.4. Overall the vehicle should conform to current road traffic legislation and that the provisions and conditions of the car insurance policy are observed so the policy is not rendered void or voidable.
- 9.5. You must provide a copy of your insurance certificate covering appropriate occasional business use on an annual basis to the Business Support Team.
- 9.6. The vehicle must not be used for business travel if the volunteer knows or suspects it may have a defect or is in any other way not roadworthy.
- 9.7. Volunteers must also ensure their vehicle has a valid MOT certificate (where required) when using it for business travel. The volunteer must submit a copy of the vehicle's MOT and insurance certificate on request to Justlife and at least annually on renewal.

Fines and penalties

- 9.8. Volunteers are responsible for the payment of any fines or charges incurred as a result of a motoring offence committed while driving on Organisation-related business. This includes, but is not restricted to, parking, congestion and speeding fines.

Accidents and loss of licence

- 9.9. Volunteers must report any road traffic accident they are involved in while driving their own vehicle on business travel (regardless of fault) to Justlife.
- 9.10. Volunteers must immediately report any court order disqualifying them from driving or any fixed penalty notices which result in disqualification if it affects your volunteer role.

Carrying of passengers

- 9.11. Volunteers are prohibited from carrying any personal passengers in their vehicle when using it for business travel unless given specific permission to. However, employees are permitted to carry business-related passengers (only with prior agreement by their supervisor and a relevant risk assessment is in place). Drivers must also be accompanied by a colleague if transporting a service user.
- 9.12. When carrying passengers, drivers should ensure they comply with the vehicle manufacturer's design specification. There should be enough seats for all passengers and only one person per seat. The driver and any passengers must wear seatbelts on all journeys.

Driving and mobile phones

- 9.13. This section applies to volunteers using an Organisation mobile phone or their own personal mobile phone while driving their own vehicle on Organisation business.

- 9.14. Volunteers are banded from using a hand-held mobile phone or similar hand-held electronic device while driving on Organisation-related business, this includes making or receiving phone calls, sending or reading text or picture messages, sending or receiving faxes or accessing the internet or email.
- 9.15. If volunteers wish to use a handheld mobile phone when driving, they must stop the vehicle and turn off the engine before using the mobile phone. A person is regarded as “driving” for the purpose of the law if the engine is running, even if the vehicle is stationary.
- 9.16. A ‘hands-free’ phone means the phone does not require the user to hold it at any point to operate it. If the phone needs to be held, for example to dial the number or to end the call, it is not hands-free.
- 9.17. Even with hands-free equipment; driving and conducting a telephone conversation are demanding tasks and volunteers should take all reasonable steps to ensure they do not carry out these tasks at the same time.

Safe driving standards

- 9.18. When driving on Organisation-related business, volunteers must drive within the law and abide by all requirements of the Highway Code. This includes ensuring:
 - Traffic signs and speed limits are observed at all times
 - The vehicle is properly parked and does not breach any road traffic regulations
- 9.19. Volunteers are prohibited from driving on Organisation-related business while under the influence of any intoxicating substance including alcohol or drugs.
- 9.20. Volunteers who take prescribed drugs and other medication which cause drowsiness should inform their supervisor before driving on Organisation-related business as this may adversely affect their ability to drive.
- 9.21. Volunteers should take regular breaks while driving on Organisation-related business as driving when tired can result in accidents.

10. CCTV

- 10.1. Justlife may use CCTV in its premises to provide a safe and secure environment for volunteers/employees, service users and visitors to Justlife’s business premises, such as service users, beneficiaries, contractors and supplies, and to protect Justlife’s property.
- 10.2. The use and management of CCTV equipment and images is in compliance with the General Data Protection Regulation (GDPR) and the Information Commissioner’s Office CCTV Code of Practice.
- 10.3. Justlife’s CCTV facility records images only. There are no audio recording and therefore conversations are not recorded on CCTV (but see the section on covert recording below).
- 10.4. CCTV is used on Organisation premises including Organisation vehicles.

Purpose of CCTV

- 10.5. The purpose of Justlife installing and using CCTV systems include to:
- Assist in the prevention or detection of crime or equivalent malpractice
 - Assist in the identification and prosecution of offenders
 - Monitor the security of Justlife's business premises and vehicles
 - Ensure that health and safety rules and Organisation procedures are being complied with
 - Assist in the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to help in providing relevant evidence.
 - Protection of volunteers/employees, and young people.
 - Promote productivity and efficiency

Location of cameras

- 10.6. Cameras are located in strategic points throughout Justlife's business premises and in vehicles, principally at the entrance and exit points. Justlife has positioned the cameras so that they only cover communal or public areas on Justlife's business premises; they have been sited so that they provide clear images.
- 10.7. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices. All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.
- 10.8. Appropriate signs are prominently and clearly displayed so that volunteers/employees, service users, beneficiaries and other visitors are aware they are entering an area covered by CCTV.

Recording and retention of images

- 10.9. Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.
- 10.10. Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.
- 10.11. As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not normally held for more than one month.
- 10.12. Once a hard drive has reached the end of its use, it will be erased prior to its disposal. Images that are stored on, or transferred onto, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant.

10.13. In normal circumstances this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images

10.14. Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in the accordance with the purposes for which they were originally collected.

10.15. The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system.

10.16. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

10.17. Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness
- Prosecution agencies, such as the Crowd Prosecution Service
- Relevant legal representatives
- Line managers involved with Organisation disciplinary processes
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders)

10.18. The Business Support Manager (or nominated person acting in their absence) is the only person who is permitted to authorise disclosure of information to external third parties such as law enforcement agencies.

10.19. All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individuals' access rights

10.20. Under the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that Justlife holds on them, including CCTV images if they are recognisable from the image.

10.21. If you wish to access any of your CCTV images, you must make a written request to the Business Support Manager. Your request must include the date and time

when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images. Note: Justlife will always check the identity of the volunteer/employee making the request before processing it.

- 10.22. The Data Protection Officer will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.
- 10.23. If Justlife is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Covert recording

- 10.24. Justlife will undertake covert recording with the written authorisation of the Business Support Manager (or nominated person acting in their absence) where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individual concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.
- 10.25. Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.
- 10.26. Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which Justlife cannot reasonably be expected to ignore.

11. DATA PROTECTION POLICY

Introduction

- 11.1. This policy sets out how Justlife processes the personal data of data subjects, including the personal data of job/role applicants and the personal data of our current and former, employees, workers, agency workers, apprentices, volunteers, contractors, consultants, service users, beneficiaries, suppliers and other third parties. It applies to all personal data that we process, regardless of the media on which those personal data are stored.
- 11.2. Justlife is committed to being clear and transparent about how we collect and use personal data and to complying with our data protection obligations.

Protecting the confidentiality, security and integrity of the personal data that we process is also of paramount importance to our business operations. Justlife will process personal data relating to you in accordance with this policy, the data protection legislation and the latest privacy notice which has been issued to you.

- 11.3. As a member of the Justlife team, you are yourself a data subject and you may also process personal data on Justlife's behalf about other data subjects. This policy should therefore be read and interpreted accordingly. You must always comply with it when processing personal data on Justlife's behalf in the proper performance of your job duties and responsibilities.
- 11.4. The data protection legislation contains important principles affecting personal data relating to data subjects. The purpose of this policy is to set out what we expect from you and to ensure that you understand and comply with the rules governing the processing of personal data to which you may have access in the course of your work, so as to ensure that neither Justlife nor you breach the data protection legislation.
- 11.5. Justlife takes compliance with this policy very seriously. Any breach of this policy or any breach of the data protection legislation will be regarded as a good reason to end your role with us.
- 11.6. Business Support Manager has responsibility for data protection compliance within the business. You should contact them if you have any questions about the operation of this policy or you need further information about the data protection legislation, or if you have any concerns that this policy is not being or has not been followed. They can be contacted on andy@justlife.org.uk. You must also contact them to seek further advice in the following circumstances:
 - If you are in any doubt about what you can or cannot disclose and to whom
 - If you are unsure about the lawful basis you are relying on to process personal data
 - If you need to rely on consent to process personal data
 - If you need to obtain or issue privacy notices
 - If you are not clear about the retention period for the personal data being processed
 - If you are unsure about what appropriate security measures you need to implement to protect personal data
 - If you need assistance in dealing with any rights invoked by a data subject
 - If you suspect there has been a personal data breach
 - Where you propose to use personal data for purposes other than that for which they were collected
 - Where you intend to engage in a significant new or amended data processing activity
 - Where you plan to undertake any activities involving automated decision-making, including profiling

- If you need assistance with, or approval of, contracts in relation to sharing personal data with third-party service providers
- If you believe personal data are not being kept or deleted securely or are being processed without the proper authorisation.
- If you suspect there has been any other breach of this policy or any breach of the data protection principles

11.7. If you wish to make an internal complaint that this policy is not being or has not been followed, you can also raise this as a formal grievance under Justlife's grievance policy.

The data protection principles

11.8. Under the data protection legislation, there are six data protection principles that Justlife and all members of staff must comply with at all times in their personal data processing activities. In brief, the principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (lawfulness, fairness and transparency)
- Collected only for specified, explicit and legitimate purpose and not further processed in a manner that is incompatible with those purposes (purpose limitation)
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation)
- Accurate and, where necessary, kept up to date; every reasonable step must also be taken to personal data that are inaccurate, having regard to the purpose for which they are processed, are erased or rectified without delay (accurate)
- Not kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the personal data are processed (storage limitation)
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality)

11.9. Justlife is responsible for, and must be able to demonstrate compliance with, these data protection principles. This is called the principle of accountability.

Lawfulness, fairness and transparency

11.10. Personal data must be processed lawfully, fairly and in a transparent manner and only for specific purposes. These include where processing is necessary for the performance of the employment contract or to meet our legal compliance obligations or where we have a legitimate interest. We have formulated areas

where we consider that we are entitled to process personal data relating to our team and this information is set out in our privacy notices.

- 11.11. The Directors are responsible for satisfying themselves that there is a proper legal basis for us to process personal data and to ensure that an appropriate privacy notice has been provided to all the volunteers/employees they are responsible for. Any queries in this regard must be raised with Business Support Manager.
- 11.12. The GDPR requires Justlife to provide detailed, specific information through specific privacy notices which must be concise, transparent, intelligible, easily accessible, and in clear and plain language so that a volunteer/employee can easily understand them. This includes the identity of the data controller (i.e. Justlife) and, how and why we will use, process, disclose, protect and retain that personal data. The privacy notice must be provided when volunteer/employee first provides the personal data. This will usually mean both at the application stage (in relation to the data necessary for that purpose) and at the time an employment contract is entered into.
- 11.13. When personal data is collected indirectly (e.g. from a third party or a publicly available source) we must provide the volunteer/employee with all the information required by the GDPR as soon as possible after collecting/receiving the data. We must also check that the personal data was collected by the third party in accordance with the GDPR and on a basis which contemplates our proposed processing of that personal data.

Purpose limitation

- 11.14. Personal data must only be collected only for specified, explicit and legitimate purposes and they must not be further processed in any manner that is incompatible with those purposes.
- 11.15. Personal data cannot be used for new, different or incompatible purposes from those disclosed to the data subject when they were first obtained, for example in an appropriate privacy notice, unless the data subject has been informed of the new purposes and the terms of this policy are otherwise complied with, e.g. there is a lawful purpose for processing. This also includes special categories of personal data and criminal records personal data.

Data minimisation

- 11.16. Personal data must be adequate, relevant and limited to what is necessary in relation to the purpose for which they are processed.
- 11.17. We will only collect personal data to the extent that they are required for the specific purposes notified to the data subject. You must only process personal data where your role duties and responsibilities require it and you must not process personal data for any reason that is unrelated to your job duties and

responsibilities. In addition, you must ensure that any personal data you collect are adequate and relevant for the intended purposes and are not excessive. This included special categories of personal data and criminal records personal data.

- 11.18. When personal data are no longer needed for specified purposes, you must ensure that they are destroyed, erased or anonymised in accordance with Justlife's guidelines on data retention and destruction set out below.

Accuracy

- 11.19. Personal data must be accurate and, where necessary, kept up to date. In addition, every reasonable step must be taken to ensure that personal data that are inaccurate are erased or rectified without delay.
- 11.20. It is important that the personal data that we hold about you as a data subject is accurate and up to date. Please keep us informed if your personal data changes. Justlife cannot be held responsible for any errors in your personal data in this regard unless you have notified Justlife of the relevant change. We will promptly update your personal data if you advise us that they have changed or are inaccurate.
- 11.21. You must also ensure that the personal data we hold about other data subjects is accurate and up to date where this is part of your role duties or responsibilities. This includes special categories of personal data and criminal records personal data. You must check the accuracy of any personal data at the point of their collection and at regular intervals thereafter. You must take all reasonable steps to destroy, erase or update outdated personal data and to correct inaccurate personal data.

Storage limitation

- 11.22. Personal data must not be kept in a form which permits identification of data subjects for longer than necessary for the purposes for which the personal data are processed.
- 11.23. Justlife will only retain personal data for as long as it is necessary to fulfil the legitimate business purposes for which they were being originally collected and processed, including for the purposes of satisfying any legal, tax, health and safety, reporting or accounting requirements. This includes special categories of personal data and criminal records personal data. You must comply with Justlife's guidelines on data retention and destruction.
- 11.24. Justlife will generally hold personal data, including special categories of personal data and criminal records personal data, for the duration of a member the teams employment or engagement.
- 11.25. Once a member of the team has left employment or their engagement has been terminated, we will generally hold their personal data, including special

categories of personal data and criminal records personal data, for one year after the termination of their employment or engagement, but this is subject to:

- Any minimum statutory or other legal, tax, health and safety, reporting or accounting requirements for particular data or records; and
- The retention of some types of personal data for up to six years to protect against legal risk, e.g. if they could be relevant to a possible legal claim in a tribunal, County Court or High Court. We will hold payroll, wage and tax records (including salary, bonuses, overtime, expenses, benefits and pension information, National Insurance number, PAYE records, tax code and tax status information) for up to six years after the termination of their employment or engagement.

Integrity and confidentiality

- 11.26. Personal data must be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- 11.27. Justlife takes the security of personal data seriously and we have implemented and maintain safeguards which are appropriate to the size and scope of our business, the amount of personal data that we hold and any identified risks. This includes encryption and pseudonymisation of personal data where appropriate. We have also taken steps to ensure the ongoing confidentiality, integrity, availability and resilience of our processing systems and services and to ensure that, in the event of a physical or technical incident, availability and access to personal data can be restored in a timely manner. We regularly test and evaluate the effectiveness of our technical and organisational safeguards to ensure the security of our processing activities.
- 11.28. In turn you are responsible for protecting the personal data we hold, and you must implement reasonable and appropriate security measures against loss, destruction and damage. You must follow all procedures, and comply with all technologies and safeguards, that we put in place to maintain the security of personal data from the point of collection to the point of destruction.
- 11.29. Where Justlife uses third-party service providers to process personal data on our behalf, additional security arrangements need to be implemented in contracts with those third parties to safeguard the security of personal data.
- 11.30. You can only share personal data with third-party providers if you have been authorised to do so and provided that certain safeguards and contractual arrangements have been put in place, including that:
 - The third-party has a business need to know the personal data for the purpose of providing the contracted services

- Sharing the personal data complies with the privacy notice that has been provided to the data subject (and, if required, the data subject's consent has been obtained)
 - The third-party has agreed to comply with our data security procedures and has put adequate measures in place to ensure the security of processing
 - The third party only acts on our documented written instructions
 - A written contract is in place between Justlife and the third party that contains specific approved terms
 - The third party will assist Justlife in allowing data subjects to exercise their rights in relation to data protection and in meeting our obligations in relation to the security of processing, the notification of data breaches and data protection impact assessments
 - The third party will delete or return all personal data to Justlife at the end of the contract
 - The third party will submit to audits
- 11.31. You may only share personal data with other members of the Justlife team if they have a business need to know in order to properly perform their job duties and responsibilities.
- 11.32. Hard copy personal files, which hold personal data gathered during the working relationship, are confidential and must be stored in locked filing cabinets. Only authorised members of staff, who have a business need to know in order to properly perform their job duties and responsibilities, have access to their files. Files will not be removed from their normal place of storage without good reason.
- 11.33. Personal data stored on removable storage media must be kept in locked filing cabinets or locked drawers and cupboards when not in use by authorised members of staff. Personal data stored in electronic format will be stored confidentially by means of password protection, encryption or pseudonymisation, and again only authorised members of staff have access to those data.
- 11.34. The GDPR requires Justlife to notify any personal data breach to the applicable regulator and, in certain instances, to the volunteer/employee concerned. We have put in place procedures to deal with any suspected personal data breach and will notify employees or any applicable regulator where we are legally required to do so. If you know or suspect that a personal data breach has occurred, contact Business Support Manager immediately. If you are unsure, please seek guidance and do not ignore such a situation.

Accountability

11.35. Justlife is responsible for, and must be able to demonstrate compliance with, the data protection principles. This means that we must implement appropriate and effective technical and organisational measures to ensure compliance and we also require you to fully assist and cooperate with us in this regard. In particular, we have:

- Appointed Business Support Manager to be responsible for data protection compliance and privacy matters within the business
- Kept written records of personal data processing activities
- Implemented a privacy by design approach when processing personal data and we will conduct and complete data protection impact assessments (DIAPs) where a type of data processing i.e. the launch of a new product or the adoption of a new program, process or IT system, in particular using a new technology, is likely to result in a high risk to the rights and freedoms of data subjects
- Integrated data protection requirements into our internal documents, including this data protection policy, other related policies and privacy notices
- Introduce a regular training programme for all members of the Justlife team on the data protection legislation and on their data protection duties and responsibilities and we also maintain a training record to monitor its delivery and completion – you must undergo all mandatory data protection training.
- Introduced regular reviews of our privacy measures and our policies, procedures and contracts and regular testing of our systems and processes to monitor and assess our ongoing compliance with the data protection legislation and the terms of this policy in areas such as security, retention and data sharing.

11.36. We also keep records of our personal data processing activities and you are required to assist us in ensuring these records are full, accurate and kept up to date.

Data subject rights to access personal data

11.37. Under data protection legislation, data subjects have the right, on request, to obtain a copy of personal data that Justlife holds on them by making a written data subject access request (DSAR). This allows the data subject to check that we are lawfully processing their personal data. The data subject has the right to obtain:

- Confirmation as to whether or not their personal data are being processed
- Access to copies of their specified personal data
- Other additional information

- 11.38. The other additional information (which should be provided in a concise, transparent, intelligible and easily accessible form, using clear and plain language) comprises:
- The purposes of the processing and the categories of personal data concerned
 - The recipients, or categories of recipients, to whom the personal data have been or will be disclosed, in particular recipients in non-EEA countries
 - Where the personal data are transferred to a non-EEA country, what appropriate safeguards are in place relating to the transfer
 - The envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
 - The existence of the data subject's rights to request rectification or erasure of their personal data or restriction of processing of their personal data or to object to such processing
 - Their right to lodge a complaint with the Information Commissioner's Office if they think Justlife has failed to comply with their data protection rights
 - Where the personal data are not collected from them, any available information as to their source
 - The existence of automated decision-making, including profiling, and meaningful information about the logic involved, as well as the envisaged consequences of such processing from them.
- 11.39. Justlife will normally respond to DSAR and provide copies of the personal data within one month of the date of the receipt of the request. However, we may extend this time limit for responding by a further two months if the request is complex or there are a number of requests made by the data subject. If we intend to extend the time limit, we will contact the data subject within one month of the DSAR's receipt to inform them of the extension and the explain why it is necessary.
- 11.40. While we normally provide a copy of the personal data in response to the DSAR free of charge, we reserve the right to charge a reasonable fee, based on our administrative costs of providing the personal data, when a DSAR is manifestly unfounded or excessive, particularly if it repeats a DSAR to which we have already responded. Alternatively, where a DSAR is manifestly unfounded or excessive, we reserve the right to refuse to respond altogether. Where we refuse to act on a request in this way, we will set out our written reasons why to the data subject within one month of receipt of their DSAR.

Your obligations in relation to personal data

- 11.41. You must comply with this policy and the data protection principles at all times in your personal data processing activities where you are acting on behalf of Justlife in the proper performance of your role and responsibilities. We rely on you to help us meet our data protection obligations to data subjects.
- 11.42. You must also comply with the following guidelines at all times:
- Only access personal data that you have authority to access and only for authorised purposes, e.g. if you need them for the work you do for Justlife, and then only use the data for the specified lawful purpose for which they were obtained
 - Only allow other members of the team to access personal data if they have the appropriate authorisation and never share personal data informally
 - Do not disclose personal data to anyone except the data subject. In particular, they should not be given to someone from the same family, passed to any other unauthorised third-party, placed on Justlife's website or posted on the internet in any form, unless the data subject has given explicit consent to do this
 - Be aware that those seeking personal data sometimes use deception to gain access to them, so always verify the identity of the data subject and the legitimacy of the request
 - Where Justlife provides you with code words or passwords to be used before releasing personal data, you must strictly follow Justlife's requirements in this regard
 - Only transmit personal data between locations by email if a secure network is in place, e.g. encryption is used for email
 - If you receive a request for personal data about another member of staff or data subject, you should forward this to the Business Support Manager.
 - Ensure any personal data you hold are kept securely, either in a locked non-portable filing cabinet or drawer if in hard copy, or password protected or encrypted if in electronic format, and comply with Justlife's guidelines on computer access and secure files storage
 - Do not access another member of staff's personal data, e.g. their personal records, without authority as this will be treated as gross misconduct and it is a criminal offence
 - Do not obtain or disclose personal data (or procure their disclosure to a third-party) without authority or without Justlife's consent as this will be treated as gross misconduct and it is a criminal offence
 - Do not write down (in electronic or hard copy form) opinions or facts concerning a data subject which would be inappropriate to share with that data subject
 - Do not remove personal data, or devices containing personal data, from the workplace with the intention of processing them elsewhere unless this

is necessary to enable you to properly carry out your job duties and responsibilities, you have adopted appropriate security measures (such as password protection, encryption or pseudonymisation) to secure the data and the device and it has been authorised by your supervisor.

- Ensure that, when working on personal data as part of your role and responsibilities when away from your workplace and with the authorisation of your supervisor, you continue to observe the terms of this policy and the data protection legislation, in particular in matters of data security
- Do not store personal data on local computer drives, your own personal computer or on other personal devices
- Do not make unnecessary copies of personal data and keep and dispose of any copies securely, e.g. by cross-shredding hard copies
- Ensure that you attend all mandatory data protection training
- Remember that compliance with the data protection legislation and the terms of this policy is your personal responsibility

Changes to this policy

- 11.43. Justlife will review this policy at regular intervals and we reserve the right to update or amend it at any time and from time to time. We will circulate any modified policy to the team, and where appropriate, we may notify you of changes by email.
- 11.44. It is intended that this policy is fully compliant with the data protection legislation. However, if any conflict arises between the data protection legislation and this policy, Justlife will comply with the data protection legislation.