



Policy:	DATA PROTECTION POLICY
Date:	11th August 2015
Approved:	Trustees Meeting 4 th June 2020
Review:	<input type="text" value="Annually"/> 3 yrs 5 yrs
Last Reviewed	June 2020
Review Date:	June 2021

1. Introduction

RRSG Data Protection Policy created with reference to:

The Data Protection and Information Commissioners guidance – www.ico.gov.uk

The RVA Data Protection Policy

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to the General Data Protection Regulation (“GDPR”).

RRSG respects the private lives of individuals and recognises the importance of safeguarding personal privacy. RRSG appreciates the responsibility of storing personal information and considers the protection of personal data to always be a priority and a consideration throughout RRSG services.

This policy provides guidance for all RRSG staff, trustees and volunteers.

The guidance outlines the considerations and management of personal data. Our Client Agreement form and Client Authorisation letter are attached for information.

Specific instructions for each block of information are detailed on a ‘Data Control Sheet’ and attached as appendices.

Data control sheets exist for the following areas. They are not part of the policy as they will be amended by the data controller as required. The current versions are attached for information.

The Data Controller is Reading Refugee Support Group.

The Organisation Data Controller is the CEO.

A1 Administer membership/Donor/Supporter Records – to fundraise and promote the interests of the charity

Purpose Description: Fundraising in support of the objectives of the Data Controller.

Data subjects: donors, member’s supporters and funders.

A2 Manage our employees and volunteers

Purpose Description: Appointments or removals, pay, discipline, superannuation, work management and other personnel matters in relation to the staff of the data controller.

Data subjects: staff including volunteers, agents, temporary and casual workers.

A3 Maintain our own accounts and records

Purpose Description: All activities involving data collection in the course of the day to day running of RRSG.



Data subjects: staff including volunteers, agents, temporary and casual workers, clients, donors, members supporters and funders

A4 Advice Work with Clients - Casework

Purpose Description: Appointments or removals, management of casework and other personnel matters in relation to the support and advice offered to clients.

Data subjects: RRSG clients

A5 Advice Work with Clients – Syrian Support Team

Purpose Description: Appointments or removals, management of casework and other personnel matters in relation to the support and advice offered to clients.

Data subjects: RRSG clients

A6 Advice Work with Clients – Drop In and Homework Club

Purpose Description: Appointments or removals, management of casework and other personnel matters in relation to the support and advice offered to clients.

Data subjects: RRSG clients

A7 Advice Work with Clients – City of Sanctuary

Purpose Description: Appointments or removals, management of casework and other personnel matters in relation to the support and advice offered to clients.

Data subjects: RRSG clients

2. Information Commissioners Data Protection Register

Taken from <https://ico.org.uk/> Search: RG1 4PS

Registration Number: Z7120255

Date Registered: 01 October 2002

Data Controller: READING RUFUGEE SUPPORT GROUP

Registration Expired: 30 September 2015

Reasons/purposes for processing information

RRSG process personal information to enable us to:

- provide a support and advice service for the benefit of the refugees, asylum seekers and migrants in the geographical area of Berkshire as specified in our constitution
- administer membership records
- fundraise and promote the interests of the charity
- manage our employees and volunteers
- maintain our own accounts and records.

Type/classes of information processed

We process information relevant to the above reasons/purposes. This may include:

- personal details
- family detail
- lifestyle and social circumstances
- membership details
- goods and services



- financial details
- education and employment details

We also process sensitive classes of information that may include:

- physical or mental health details
- racial or ethnic origin
- religious or other beliefs of a similar nature

Who the information is processed about

We process personal information about:

- members
- staff, volunteers
- trustees
- complainants, supporters
- enquirers
- advisers and representatives of other organisations

Who the information may be shared with

We sometimes need to share the personal information we process with the individual themselves and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

- members
- family, associates or representatives of the person whose personal data we are processing
- employees
- current, past and prospective employers
- healthcare, social and welfare organisations
- educators and examining bodies
- financial organisations
- employment and recruitment agencies
- survey or research organisations
- business associates and professional advisers
- providers of goods and services
- local and central government
- other voluntary and charitable organisations

Transfers

It may sometimes be necessary to transfer personal information overseas. In practice we only expect to share data within the UK European Economic Area (EEA). Any transfers made will be in full compliance with all aspects of the data protection act.

3. Managing the protection of personal data

Any staff member considering the creation of a new store of data, reviewing the storage of existing data or using existing data in a new way will consider the following questions and the responsible manager will complete a Data Control Sheet which will be added to the appendices and ensure all relevant staff and volunteers are aware of the Data Control Sheet and understand its contents.

a) Is the information personal data?



If the information is going to be processed by a computer or as part of a filing system and it relates to an individual who can be identified then it is personal data and covered by this policy and data protection legislation.

If there is any doubt treat the information as personal data.

b) What are the risks?

This is the key question. It is vital that all possible risks are identified and the level of risk should dictate how the data is obtained and managed.

It is important to note that compliance with the processing requirements is not of itself enough. The paramount consideration must be given to the consequences of the processing to the interests of the end user.

The risks will vary; for example, there may be a risk of an individual being subjected to direct marketing or a risk that an individual's faith, ethnicity, or sexual orientation is revealed by association and their home address identified by extremists.

c) How can we process the personal data lawfully?

To fulfil its legal requirements RRSg is required to be 'fair' to the person. To be 'fair' to that person he/she must have given his consent to the processing.

Before asking an individual to give consent RRSg must ensure they have informed the person of;

- the identity of RRSg
- the intended purposes for the data
- any other circumstances or possible outcomes.

RRSG will ensure the individual is able to understand the information provided and realises any possible consequences.

If the personal data is 'sensitive' then the consent must be 'absolutely explicit,' which means informed consent from the Data Subject.

"Sensitive' data reveals the individuals;

- racial or ethnic origin,
- political opinions
- religious beliefs
- trade union membership
- physical/mental health or condition
- sexual life
- criminal record

4. The storing and managing of personal data

- The data shall be obtained for specific purposes and will not be used for any other purpose. RRSg will only use personal data for the purposes the individual consented to.
- RRSg will only request data that is relevant, not excessive, and adequate for its purpose. Data will not be stored on the basis that it may be useful one day.



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- RRSG will make a reasonable effort to ensure the data obtained is accurate and will provide a method of regular review, in the Data Control Sheet, to keep it up to date if necessary.
 - RRSG will not keep data for longer than is necessary. A review period will be specified in the Data Control Sheet and any data held that is no longer necessary will be deleted.
 - RRSG will rectify, delete or cease to hold data within a reasonable time of a request by the individual.
 - RRSG will take all measures to prevent unauthorised or unlawful processing of personal data and accidental loss or damage. The measures will be specified in the Data Control Sheet.
 - RRSG will not transfer personal data outside the European Economic Area.

5. Management of the Data Control Sheets

- RRSG will produce a Data Control Sheet for each category of data held.
- The Data Control Sheets will not form part of this policy as the Responsible Manager may need to alter the instructions as circumstances change or produce additional sheets should the storage of additional data be required.



A1 Data Control Sheet: Administer Client/membership/Donor/Supporter Records – to fundraise and promote the interests of the charity

Organisation Data Controller	RRSG CEO
Responsible Manager	Fundraising Manager
The data subjects	Members/Volunteer/Donors/Supporter/ & Organisation contacts
The information held	Name, address, contact details, monitoring info. to include any disability, ethnicity, brief employment info, immigration status, work contact details

The purposes of the information – To manage volunteer positions, update donors and supporters with relevant news and to inform of training. To contact the partner organisations. To survey for customer satisfaction.

Are these purposes registered with the commissioner and under which heading?

To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Some sensitive information is held for monitoring purposes. Any information could be accessed by a volunteer or member of staff.

How to eliminate or minimise those risks –

Information will not be held for longer than necessary.

Data is password guarded.

References are taken for all volunteers.

Information to be given prior to consent –

What data will be stored.

How the data will be stored.

What the data will be used for and for how long.

How will that information be given – On the registration form.

How will consent be obtained? - By completing the registration.

How will an individual correct or request removal of their personal data?

A strap line will be included in all subsequent correspondence asking subjects to phone or email if their info. is no longer correct.

How long will data be stored?

12 months or until the data subject requests removal.

What to do if an individual requests to see their personal data?

Forward the request to the Organisation RRSB Data Controller who will respond to the request.



A2 Data Control Sheet: Managing our Employees and Volunteers

Organisation Data Controller	RRSG CEO
Responsible Manager	Office Manager/ Volunteer Coordinator
The data subjects:	Applicants and Former applicants [successful and unsuccessful] Employees, Casual staff, Volunteers [current & former]
The information held	Details provided on recruitment, appointments or removals, pay, related to work performance, disciplinary/grievances, superannuation and any other personnel matter.

The purposes of the information – sufficient information to be able to meet the employer duties and be a responsible effective employer.

Are these purposes registered with the commissioner and under which heading?

To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Sensitive information could be revealed. Personnel embarrassment. Contact details/address could be revealed to inappropriate person. Home address details could be obtained by clients with a complaint.

How to eliminate or minimise those risks – store data in a locked cupboard. Delete information once it is no longer needed.

Information to be given prior to consent – That the information will be held for the reasons stated.

How will that information be given - Employee/volunteer terms and conditions.

How will consent be obtained? - By signing the Employee Terms and Conditions.

How will an individual correct or request removal of their personal data?

By written request to the RRSR CEO.

What actions will be taken to ensure the security of the data?

The information will be stored in a locked cupboard and destroyed once it is no longer needed.

For how long will the data be stored?

Unsuccessful applicants – all data should be destroyed as soon as possible and certainly within 6 months. Unless permission is requested and given for details to be retained for future vacancies.

Staff & volunteers - retained for genuine professional necessity and not just in case.

Following employment:

- PAYE records – 3 years
- SSP records – 3 years
- SMP records – 3 years
- Other details other than contact – 6 months
- Any information relating to an industrial accident – 12 years
- Information relating to pension contributions for at least 10 years

What to do if an individual requests to see their personal data?

Forward the request to the Organisation Data Controller who will respond to the request.

A3 Data Control Sheet: Managing our accounts and records

Organisation Data Controller	RRSG CEO
Responsible Manager	Finance Manager
The data subjects	Any data subject with whom we have reason to contact whilst pursuing the objectives of RRSg.
The information held	Name, home address, telephone number, email address, emails RRSg has sent or received.

The purposes of the information

To inform individuals of activities that may be of interest to them, to circulate information.

Are these purposes registered with the commissioner and under which heading?

Yes - Information & databank administration and realising the objectives of a charitable organisation. To be confirmed during reregistration process Sept 15.

Potential risks for the data subject – The content of emails or correspondence may contain sensitive information or personal data. Non-RRSG staff may access this information.

The data subject may receive unwanted mail.

How to eliminate or minimise those risks –

- Only keep hard copies of emails containing personal data if absolutely necessary.
- Only store correspondence that may be needed and review as detailed below.
- Hide email addresses when mailing to a group. Us BCC. Staff training to be given.
- When sending marketing information or ebulletins give the receiver the option to be excluded from future mailings or to update their details and always action this request promptly.
- Clear written guidelines for staff and admin volunteers for sending and forwarding emails.

Information to be given prior to consent – The nature of any mail they may receive.

How will that information be given - In a registration form or via an email.

How will consent be obtained? –

- By saying they wish to be included on a mailing list.
- By signing a consent form e.g. on a training booking form agreeing to being sent information on future training courses.
- By not taking the option to opt out that must be included in all mailings.

For how long will the data be stored?

Until it is no longer needed.

Until the data subject requests its removal.

Up to a maximum of 5 years.

How will an individual correct or request removal of their personal data?

By telephone, in person, by letter, email.

What actions will be taken to ensure the security of the data?

The data will be stored electronically allowing access to RRSg staff and volunteers.

The option to hide email addresses' will be taken when possible.

What to do if an individual requests to see their personal data?



Forward the request to the Organisation Data Controller who will respond to the request.



A4 Data Control Sheet: Advice work _Casework

Organisation Data Controller	RRSG CEO
Responsible Manager	Caseworker Manager
The data subjects	Anyone seeking advice or who may be connected to the circumstances requiring advice.
The information held	Name, home address, telephone number, email address, country or origin, immigration status, marital status, number and names of children, work skills, employment history, bank details, criminal record and others:

Information required to provide the advice need. Most of the information relates to individuals and relates to communication with the Home Office, OISC, Police, Border Agency, RBC, Social Services, and others. Particular care needed with all data.

The purposes of the information - To support refugees and asylum seekers gain access to the right support services.

Are these purposes registered with the commissioner and under which heading?

Yes - Realising the objectives of a charitable organisation. To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Damage to immigration status, legal status, location and identification by traffickers, children taken in to care

How to eliminate or minimise those risks – A need to respect the privacy of the data subject and not to hold unnecessary data or hold any data beyond the period required for the use it was given. Strict physical storage and electronic/computer controls.

Information to be given prior to consent – how the data will be stored, what the data will be used for and possible consequences for providing sensitive data.

How will that information be given - In a registration form and consent form. Verbally discussed.

How will consent be obtained? - By the data subject signing consent form.

For how long will the data be stored?

Once the advice has been provided all personal data will be destroyed in accordance with the RRSR GDPR Documentation Controller and Processor spreadsheet (attached to this policy) apart from contact details, or when the data subject requests its' removal, whichever is sooner.

How will an individual correct or request removal of their personal data?

By telephone, in person, by letter, email.

What actions will be taken to ensure the security of the data?

The data will be stored electronically allowing access to RRSR staff and volunteers. Any hard copies will be shredded within 1 month of being entered on the system.

What to do if an individual requests to see their personal data?

Forward the request to the Organisation Data Controller who will respond to the request.



A5 Data Control Sheet: Syrian Support

Organisation Data Controller	RRSG CEO
Responsible Manager	Syrian Support Team Manager The data subjects Anyone seeking advice or who may be connected to the circumstances requiring advice.
The information held	Name, home address, telephone number, email address, country or origin, immigration status, marital status, number and names of children, work skills, employment history, bank details, criminal record and others:

Information required to provide the advice need. Most of the information relates to individuals and relates to communication with the Home Office, OISC, Police, Border Agency, RBC, Social Services, and others. Particular care needed with all data.

The purposes of the information - To support refugees and asylum seekers gain access to the right support services.

Are these purposes registered with the commissioner and under which heading?

Yes - Realising the objectives of a charitable organisation. To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Damage to immigration status, legal status, location and identification by traffickers, children taken in to care

How to eliminate or minimise those risks – A need to respect the privacy of the data subject and not to hold unnecessary data or hold any data beyond the period required for the use it was given. Strict physical storage and electronic/computer controls.

Information to be given prior to consent – how the data will be stored, what the data will be used for and possible consequences for providing sensitive data.

How will that information be given - In a registration form and consent form. Verbally discussed.

How will consent be obtained? - By the data subject signing consent form.

For how long will the data be stored?

Once the advice has been provided all personal data will be destroyed in accordance with the RRSR GDPR Documentation Controller and Processor spreadsheet (attached to this policy) apart from contact details, or when the data subject requests its' removal, whichever is sooner.

How will an individual correct or request removal of their personal data?

By telephone, in person, by letter, email.

What actions will be taken to ensure the security of the data?

The data will be stored electronically allowing access to RRSR staff and volunteers. Any hard copies will be shredded within 1 month of being entered on the system.

What to do if an individual requests to see their personal data?

Forward the request to the Organisation Data Controller who will respond to the request.



A6 Data Control Sheet: Drop In and Homework Club

Organisation Data Controller	RRSG CEO
Responsible Manager	Drop In Coordinator
The data subjects	Anyone seeking advice or who may be connected to the circumstances requiring advice.
The information held	Name, home address, telephone number, email address, country or origin, immigration status, marital status, number and names of children, work skills, employment history, bank details, criminal record and others:

Information required to provide the advice need. Most of the information relates to individuals and relates to communication with the Home Office, OISC, Police, Border Agency, RBC, Social Services, and others. Particular care needed with all data.

The purposes of the information - To support refugees and asylum seekers gain access to the right support services.

Are these purposes registered with the commissioner and under which heading?

Yes - Realising the objectives of a charitable organisation. To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Damage to immigration status, legal status, location and identification by traffickers, children taken in to care

How to eliminate or minimise those risks – A need to respect the privacy of the data subject and not to hold unnecessary data or hold any data beyond the period required for the use it was given. Strict physical storage and electronic/computer controls.

Information to be given prior to consent – how the data will be stored, what the data will be used for and possible consequences for providing sensitive data.

How will that information be given - In a registration form and consent form. Verbally discussed.

How will consent be obtained? - By the data subject signing consent form.

For how long will the data be stored?

Once the advice has been provided all personal data will be destroyed in accordance with the RRSR GDPR Documentation Controller and Processor spreadsheet (attached to this policy) apart from contact details, or when the data subject requests its' removal, whichever is sooner.

How will an individual correct or request removal of their personal data?

By telephone, in person, by letter, email.

What actions will be taken to ensure the security of the data?

The data will be stored electronically allowing access to RRSR staff and volunteers. Any hard copies will be shredded within 1 month of being entered on the system.

What to do if an individual requests to see their personal data?

Forward the request to the Organisation Data Controller who will respond to the request.



A7 Data Control Sheet: Support Work City of Sanctuary

Organisation Data Controller	RRSG CEO
Responsible Manager	RCoS Manager
The data subjects	Anyone engaging with programmes or events.
The information held	Name, home address, telephone number, email address, country or origin, immigration status, marital status, number and names of children, work skills, employment history, bank details, criminal record and others:

Information required to provide the advice need. Most of the information relates to individuals and relates to communication with the Home Office, OISC, Police, Border Agency, RBC, Social Services, and others. Particular care needed with all data.

The purposes of the information - To support refugees and asylum seekers gain access to the right support services.

Are these purposes registered with the commissioner and under which heading?

Yes - Realising the objectives of a charitable organisation. To be confirmed during reregistration process Sept 15

Potential risks for the data subject – Damage to immigration status, legal status, location and identification by traffickers, children taken in to care

How to eliminate or minimise those risks – A need to respect the privacy of the data subject and not to hold unnecessary data or hold any data beyond the period required for the use it was given. Strict physical storage and electronic/computer controls.

Information to be given prior to consent – how the data will be stored, what the data will be used for and possible consequences for providing sensitive data.

How will that information be given - In a registration form and consent form. Verbally discussed.

How will consent be obtained? - By the data subject signing consent form.

For how long will the data be stored?

Once the advice has been provided all personal data will be destroyed in accordance with the RRSR GDPR Documentation Controller and Processor spreadsheet (attached to this policy) apart from contact details, or when the data subject requests its' removal, whichever is sooner.

How will an individual correct or request removal of their personal data?

By telephone, in person, by letter, email.

What actions will be taken to ensure the security of the data?

The data will be stored electronically allowing access to RRSR staff and volunteers. Any hard copies will be shredded within 1 month of being entered on the system.

What to do if an individual requests to see their personal data?

Forward the request to the Organisation Data Controller who will respond to the request.



CONSENT/AUTHORISATION LETTER

- I confirm that I have instructed Reading Refugee Support Group to represent me and act on my behalf
- I authorise all relevant details and documents of my case to be disclosed/released to RRSB
- I authorise my medical records to be disclosed to RRSB
- I authorise RRSB to liaise with third parties concerning my case and to disclose relevant details.

I authorise RRSB to discuss my case and disclose my details with [contact name]
_____ of [Agency name]_____

This consent form has been explained to me and I hereby give my full consent to the above.

Client's

Name _____ Signature _____

Date _____

Representative declaration and Signature

I hereby confirm that this consent form has been explained to my client and I am satisfied he/she has understood.

Representative _____ Signature _____

Date _____



READING REFUGEE SUPPORT GROUP (RRSG) CLIENT SERVICE AGREEMENT

WHAT YOU CAN EXPECT FROM US

RRSG is a charitable organisation established to assist asylum seekers and refugees to access advice and services to which they may be entitled.

RRSG provides confidential advice and assistance and will not give out your information without your permission. Paper records will be kept securely and computer records protected by passwords. You may access or request copies of information we hold on your behalf.

RRSG is required by law to give information to authorities if you have told us that you are involved in terrorist activities or drug trafficking and we may also do this if we believe you are a danger to yourself or others. The range of services a client may be entitled to is dependent on immigration status and once you have applied for asylum or been granted status we can help with things such as: - Immigration, Housing, Health and Welfare.

If we cannot assist you, where possible, we will refer you to other organisations, which may help you and explain to you why we are doing this.

WHAT WE EXPECT FROM YOU

- We ask you to be polite and respectful to all users of our service and our staff.
- Please keep us up to date with any changes in your circumstances such as information from UKBA, address and contact details, additional family members.
- If you cannot keep an appointment please phone to reschedule or cancel as missed appointments will not be rescheduled without a good reason.
- Please provide any documents we request as quickly as possible.

You can attend the office during the drop in session or by appointment. If you need an interpreter we can provide one. We will not allow children under 16 years old to act as interpreters.



If you are unhappy with our service please tell us so that we can explain things or change what we are doing for you. You may complain about RRSR services by lodging a complaint through RRSR complaint procedures available from reception or by complaining about us to OISC.

DECLARATION

The information I have given is accurate and I have read or had explained to me and understand the above agreement. I authorize RRSR to act on my behalf and agree as necessary for information it holds to be shared with other agencies relevant to my needs.

RRSR is registered with and regulated by the Office of the Immigration Services Commission (OISC) and as such participates in case audits which involve the review of a sample of case records, which may include yours, to ensure services are provided to a satisfactory standard. Unless you say otherwise you are deemed to agree to your record being reviewed by OISC in accepting this agreement.

(Tick box if you do not wish your records to be made available to the OISC or other agencies for audit purposes)

CLIENT NAME

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SIGNATURE

DATE

