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## PRIVACY POLICY

### Introduction

Refugee Kindness – North Wales is committed to upholding the privacy of all members and associates including the refugee/asylum seeker members and all volunteers.

The charity known as Refugee Kindness – North Wales (hereafter “Refugee Kindness”, “we”, “us”, “the charity”), registered under charity number 1192930, distributes items and provides support to refugees, asylum seekers and, at our discretion, others in need within the North Wales region.

Any disclosure of confidential information about a beneficiary to another person for the purpose of assisting any beneficiary is only undertaken with the expressed permission of the individual or the parent/s of minors, except:

- To protect the welfare of a child or vulnerable adult or
- In very limited and extremely rare circumstances where a person is suspected of a disclosable offence or terrorism.
- Where we are legally required to provide this information, for example as the result of a court order, police enquiry or similar.

Refugee Kindness position on confidentiality is made clear to all connected with it. The Volunteers of Refugee Kindness are responsible for ensuring that the requirements of this policy are met throughout.

### Data Collection

The General Data Protection Regulation (GDPR) and the current Data Protection Act regulate the use of personal data. Refugee Kindness will ensure that all rights under the legislation are upheld.

It is our responsibility to ensure that personal data is processed fairly and lawfully.

All Volunteers must comply with all Refugee Kindness policies and procedures in relation to processing data. Failure to do so may result in disciplinary action up to and including dismissal.

- a) Refugee Kindness complies with the requirements of the Data Protection Act 2018, the UK GDPR and the principles of good data protection practice.
- b) Refugee Kindness ensures that all manual or electronic records, or backed up data, containing personal information, including family, volunteer or personnel files, are kept securely.
- c) Access to Beneficiary files is restricted only to those who need access. The General Manager and the Trustee(s) are responsible for spot-checking files, for the purpose of Quality Assessment review.
- d) Access to personnel files is restricted to the individual's Line Manager, the General Manager and only when strictly necessary to the Trustee(s).
- e) Care is taken to ensure that minimal information about the Beneficiaries is recorded within a Volunteer's file.
- f) Beneficiaries must not be identified on Facebook, notice boards, whiteboards, accessible card index files etc. without their permission.
- g) Volunteers are aware that information is held about them and that they have the right to request to see it; personal information is not shared with external agencies without permission.
- h) All records are securely destroyed when no longer required.

Statistical information about the number and location of Beneficiaries supported and the type of work undertaken may be shared with funders in line with the requirements of any Service Level Agreement or contract. Information that may identify any Beneficiary will not be shared except with the specific permission of the family.

### What data do we collect and how do we use it?

Information is provided directly from members, donors and beneficiaries. Members initially contact the Charity via the Facebook group.

Refugee Kindness collects and processes the following personal data for the following purposes and the lawful basis for each:

Purpose	Type of data	Lawful basis for Processing
To manage our relationship with our beneficiaries, to allow us to deliver donated items and provide friendship	Beneficiary name, address and contact details (telephone number, email address)	To perform our contract with recipients of donated items and friendship
To provide information and updates of our work to	Name, email address	Legitimate interest of members if the Charity

members of the Charity in the form of newsletters		
To engage with volunteers and other staff	Name, address, contact details (email address, telephone number)	To perform our contract with staff and volunteers in the coordination of donations, distribution of items and provision of other support to beneficiaries.

## Your rights

Under data protection law, you have rights we need to make you aware of relating to your personal data. The rights available to you depend on our reason for processing your information.

<b>Access your data</b>	You can request a copy of your personal data that we hold.
<b>Rectification</b>	You can ask us to correct any incomplete or inaccurate personal data we hold about you.
<b>Erasure</b>	<p>You can ask us to delete or remove your personal data where:</p> <ul style="list-style-type: none"> <li>• there is no good reason for us continuing to process it;</li> <li>• you have successfully exercised your right to object (see below);</li> <li>• we may have processed your information unlawfully; or</li> <li>• we are required to erase your personal data to comply with local law.</li> </ul> <p>We may not always be able to comply with your request for specific legal reasons, in which case these will be notified to you at the time of your request</p>
<b>Object</b>	You have the right to object to the processing of your personal data if you feel it impacts on your fundamental rights and freedoms, unless we can demonstrate compelling legitimate grounds to continue processing which override these.
<b>Restrict processing</b>	<p>You can ask us to us to suspend or restrict the processing of your personal data, if:</p> <ul style="list-style-type: none"> <li>• you want us to establish the accuracy of your personal data;</li> <li>• our use of your personal data is unlawful, but you do not want us to erase it;</li> <li>• you need us to hold your personal data (where we no longer require it) as you need it to establish, exercise or defend legal claims; or</li> <li>• you have objected to our use of your personal data, but we need to verify whether we have overriding legitimate grounds to use it.</li> </ul>
<b>Request a transfer</b>	This only applies to information that you have given us. You can request a transfer of your personal data to you or a third party which you provided

	your consent for us to process, or for which we need to process to perform our contact with you.
<b>Withdraw your consent</b>	You can withdraw your consent at any time (where we are relying on consent to process your personal data). This does not affect the lawfulness of any processing carried out before you withdraw your consent.

## Interpretation

<b>Board</b>	All trustees registered at the Charities Commission as trustees acting together and in accordance with the Constitution.
<b>Chair of Trustees</b>	The trustee appointed as chair of trustees
<b>Constitution</b>	The governing document for Refugee Kindness
<b>Data Protection Officer</b>	The current appointed Data Protection Officer
<b>Funders</b>	Any person or entity providing financial assistance and support to the Charity.
<b>General Manager</b>	The General Manager of Refugee Kindness.
<b>Line Manager</b>	The direct manager of all volunteers. In the case of the General Manager, the Line Manager is the Chair of Trustees.
<b>Refugee Kindness</b>	The charity known as Refugee Kindness – North Wales, registered under number 1192930
<b>Trustees</b>	The trustees of Refugee Kindness.
<b>Staff</b>	Any volunteer(s), employee(s) or Trustee(s) within Refugee Kindness at the time

## Privacy

### Beneficiaries

Beneficiaries are to be given clear information, verbally and in writing, which explains Refugee Kindness position on confidentiality. This should be in the form of Appendix 1.

- a) Where any beneficiary wishes to be referred to any agency either on the advice of a Refugee Kindness volunteer or otherwise, Refugee kindness will request consent for the beneficiary's information to be shared for that purpose. However, only the minimum information necessary will be provided to any such agency. The consent should be obtained by way of a signature to the form at Appendix 2.
- b) Where further information is required by the agency from Refugee Kindness, specific consent will be sought from the beneficiary setting out precisely what information is required.
- c) Beneficiaries will always be informed of any communication between Refugee Kindness and other agencies about them, unless this will impact on the safety or welfare of a child or vulnerable adult.
- d) The records of all Beneficiaries are securely stored online by the General Manager with only the volunteers working directly with the particular Beneficiaries having access to those records.
- e) Beneficiaries have the right to request to see their records.

### Safeguarding

- a) Where it is considered necessary for the welfare and protection of a child or vulnerable adult, information is shared with the appropriate authority in line with Refugee Kindness Safeguarding Policy.
- b) Beneficiaries are kept informed of Refugee Kindness actions in passing on information unless to do so would put the child or vulnerable adult at greater risk of harm.
- c) Where there are concerns about the safety or wellbeing of a child or vulnerable adult, adherence to Refugee Kindness Safeguarding Policy over-rides this confidentiality policy.

### General Information

- a) General information provided to the Board of Trustees about Beneficiaries relating to the nature and level of referrals and local trends should not contain personal information

about any Beneficiary or information that could identify a Beneficiary. This does not include information passed to the Chair of Trustees in the capacity of Line Manager to the General Manager.

- b) Case studies that are provided to the Board of Trustees to illustrate the work and outcomes of Refugee Kindness are to be anonymised.
- c) Trustees and those attending Board meetings, are aware that information relating to Beneficiaries and the operation of the scheme is treated in confidence.
- d) Where there are concerns for the safety or welfare of a child or vulnerable adult, the Safeguarding Officer may liaise with the Chair of Trustees or, in his or her absence another trustee, specialist safeguarding adviser to the Board or an external expert to ensure that the most appropriate process is being followed within the scheme and to ensure the best possible support of any Beneficiary. The Beneficiary will not be identified unless it is necessary to do so.
- e) Confidential Board discussions relating to personnel issues or sensitive operational matters are minuted separately as a confidential item and their circulation restricted.
- f) Trustees ensure that the privacy of Beneficiaries, volunteers and staff, and confidential information relating to the operational work of Refugee Kindness at all times in line with this policy and procedure.
- g) Breaches of Privacy are treated seriously and may result in the individual concerned being required to leave the scheme.

#### Staff

- a) The Refugee Kindness Privacy policy and procedure is provided to all new staff, as a key part of their induction. All staff comply with its requirements.
- b) All staff must read this policy and sign the Confidentiality Agreement at Appendix 2.
- c) All staff discuss the support of beneficiaries with their Line Manager, in a confidential setting for the purposes of supervision and to ensure the best possible support to any Beneficiary.
- d) Staff ensure that the confidentiality of Beneficiaries and volunteers and confidential information relating to the operational work of Refugee Kindness is maintained at all times in line with this policy and procedure.
- e) All confidential information relating to employees, volunteers, beneficiaries and Trustees must only be shared where necessary to do so basis.

## External Organisations

- a) External auditors accessing family logs for quality auditing purposes do so in the presence of the General Manager and sign and date an additional page in the log.
- b) If Refugee Kindness is requested or required to provide evidence in court proceedings, and the request does not fall within one of the exemptions identified in this policy; evidence will normally only be provided in response to a Court Order.
- c) Where Refugee Kindness is asked by the Police to provide information, the Trustees must be made aware of the request immediately. Refugee Kindness will not provide information to the police unless one of the exceptions within this policy applies or in response to a Court Order.

## Review

This policy will be reviewed periodically to make any amendments necessary to reflect any changing legal requirements.

## Document History

Version	Date	Author	Comment
<b>0.1</b>	November 2020	Rachel Watkin	Initial Draft
<b>0.2</b>	March 2021	Rachel Watkin	Updated following review
<b>0.3</b>	August 2021	Rachel Watkin	Updated following review
<b>1.0</b>	25 Aug 2021	Rachel Watkin	Issued following review and sign-off by Trustees
<b>1.1</b>	May 2022	Tim Burnett	Updated privacy policy, data protection sections