

Refugee Support Network: privacy policy

Version 1.7 (July 2018)

At the heart of RSN's ethos is a commitment to respect all people and work in partnership and with integrity. We are therefore committed to ensuring that everyone who entrusts their personal information to us can have confidence that it will be collected, used and stored both lawfully and transparently.

[New data protection laws \(GDPR\)](#) came into force on 25th May 2018 which require organisations like us to make it as easy as possible for you and everyone who interacts with RSN in some way to understand how and why we collect and use your personal data, the lawful basis for doing so, and to know what your rights are.

Click on the links below to find the answers to your questions:

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1. Who are “we”?

This privacy policy is written by Refugee Support Network (RSN), referred to as “we” throughout this document.

We are a registered charity (number 1132509) whose vision is to enable young refugees, asylum seekers and survivors of trafficking to build more hopeful futures. We do this by supporting them to access, remain and progress in education.

Our contact details are:

1st Floor, the Salvation Army Building
32 Manor Park Rd, London, NW10 4JJ
www.refugeesupportnetwork.org

If you have any questions about your data, please contact privacy@refugeesupportnetwork.org.

2. “Where do you get my information from and what do you do with it?”

We get information from you directly or from other organisations (such as donation platforms and referral organisations). We use this information to provide you with the services or

information you have requested, for administration purposes, to comply with regulations and the law and to further our charitable aims.

The type of information you share with us and the purpose you share it for shape the way that we use and keep your data. To make it easier to understand, we've divided our explanations by the different groups of people who interact with us. See section 8 for details.

We tell you about our data protection processes whenever you first give us your information. For example, when you complete our mentoring enquiry form or sign up to our newsletter you'll see a short explanation of why we're processing your personal data, how long we'll keep it for and who we'll share it with, and we'll give you a link you to this longer policy. When we get information about you from another source (such as a referral organisation or donation platform) we will provide you with our privacy information in our first communication with you.

3. “How do you keep my information safe?”

RSN protects your personal information through physical, electronic and managerial measures, including:

- Minimising the amount of personal information we have about you by only asking for information that is relevant to your reasons for contacting us and deleting it when we no longer have a valid lawful basis for keeping it.
- Limiting access to your information to as few people as necessary
- Verifying that all of our electronic storage is secured and encrypted where possible.
- Keeping hard copy information to a minimum and locking it away.
- Using third party processors (such as the companies who process donations for us) who are GDPR compliant.
- Training all staff to understand and work in line with our commitment to protecting your data.

4. “Do you share my information with anyone?”

Yes, in some cases. In section 8, we provide more details about how various information is shared externally for different purposes. However, RSN will not share your personal information with anyone without your knowledge.

5. “What are my rights and how can I complain if I want to?”

GDPR provides you with the following rights about your data. [Click here](#) to find out more details about each of these on the Information Commissioner’s Office’s website.

- **The right to be informed:** You have the right to know - in a way that is understandable and clear - how and why RSN is collecting, using and storing your personal data.
- **The right to access:** You have the right to get your personal information from RSN in order to be aware of and verify the lawfulness of how we’re using your data. See section 6 below to find out out to do this.
- **The right to rectification:** You have the right to have inaccurate information rectified and/or to ask us to complete your information if it is incomplete.
- **The right to erasure:** You have the ‘right to be forgotten’ and ask for your personal information to be erased by RSN.
- **The right to restrict processing:** You have the right to ask us to restrict or suppress your personal data.
- **The right to data portability:** You have the right to obtain and reuse your personal data for your own purposes across different services, allowing you to move, copy or transfer personal data from one IT environment to another in a safe and secure way.
- **The right to object:** You have the right to object to RSN processing your data on the grounds of our own legitimate interests, using your information for direct marketing and profiling, and for the purposes of research and statistics.
- GDPR also includes a range of rights in relation to **automated decision-making and profiling**.

If you are unhappy with any of our data processes or want to exercise any of these rights, please get in touch with us (contact details below in section 6).

If you are not satisfied with the way that we have handled your request, you can complain to the Information Commissioner’s Office (ICO). Their contact details can be found here:

<https://ico.org.uk/concerns/>

6. “How can I access/change the information that RSN holds about me?”

You can contact us about your data at any time. To do so, please get in touch with our privacy team at:

Refugee Support Network

1st Floor, the Salvation Army Building
32 Manor Park Rd, London, NW10 4JJ
www.refugeesupportnetwork.org

privacy@refugeesupportnetwork.org

7. “Does your policy change? How can I be confident in your privacy practices?”

In the run up to new data protection legislation, we have undertaken a comprehensive audit to review the information we hold and what we’re doing with it. Putting ourselves in the position of those we’re collecting information about, we’ve reviewed why we process data, ensuring that each activity has a lawful basis. We have documented our decisions, trained our staff and updated our privacy policy to reflect not only our compliance with GDPR but our ethos-led commitment to respect and protect all data entrusted to us.

Going forward, we will annually review and, where necessary, will update our privacy information. If we plan to use personal data for a new purpose, we will update our privacy policy and tell you about the changes. We will continue to learn best practice in this area, embedding the principles of data protection in how we plan and carry out our organisational mission and requiring all staff to work in line with our data protection practice guide.

8. “How do you collect, use and store information provided to RSN by different groups of people?”

We use information about different people in different ways. In all cases, you have numerous rights about how your data is processed and who to talk to if you’re worried. Please refer to section 7 above for information about your rights and the complaints process.

Please note: we are updating this section of our privacy policy in the run up to 25th May when GDPR comes into force. Subsequent versions of this policy will be dated and uploaded onto our website. If these changes affect you, we’ll specifically contact you.

8.1 “I’ve signed up to your email newsletter. What information do you have about me and what will you do with it?”

We invite visitors to our website and others who interact with RSN in person to give us their contact information. We use this contact information to email updates about our work, including opportunities to support us, fundraise for young refugees, attend events or apply for roles on our team.

We only send these emails to people who have consented to receive them, either by entering their email address directly into the sign-up form on our website or by providing their email address to a staff member for that purpose (ie on a sign up sheet at an event) who will then manually add the email address to the mailing list. We use a double opt-in process whereby everyone who opts in can verify their subscription to our mailing list.

Our mailing list is managed by Mailchimp who process and store the personal data you have provided. Click here to read Mailchimp’s [privacy policy](#). You will remain on the mailing list until you unsubscribe. You can unsubscribe by clicking ‘unsubscribe’ at the footer of one of our emails, or by contacting our privacy team.

You have numerous rights about how your data is processed and who to talk to if you’re worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner’s Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.2 “I’ve made a donation to RSN. What information do you have about me and what will you do with it?”

When you donate to RSN by direct bank transfer, cheque or cash, we collect your information to process your donation, claim gift aid (where applicable) and thank you.

When you donate to RSN through our website or another website, your data will be processed by other companies on our behalf. Those companies will share your information (such as name, financial information and contact details) with us. These companies are:

- **JustGiving**, an online portal and service for individual donors and people organising fundraising events for us. [Click here](#) to read JustGiving’s privacy policy.

- **Stripe**, a company which processes one off card donations for RSN. [Click here](#) to read Stripe's privacy policy. The Stripe platform is integrated into our website which is designed and hosted by White Fuse Media. [Click here](#) to read White Fuse Media's privacy policy.
- **Go Cardless**, a company which processes direct debit payments for RSN. [Click here](#) to read Go Cardless's privacy policy. The Go Cardless platform is integrated into our website which is designed and hosted by White Fuse Media. [Click here](#) to read White Fuse Media's privacy policy.
- **Charities Aid Foundation (CAF)**, an online portal for payroll giving, direct individual giving and corporate giving. [Click here](#) to read CAF's privacy policy.
- **Benevity**, a giving platform for corporate donations. [Click here](#) to read Benevity's privacy policy.
- **Give as you Live**, an online fundraising platform which enables people to raise funds for charity when they use it as a portal to other websites. [Click here](#) to read Give as you Live's privacy policy.
- **Stewardship**, an online portal for individual giving. [Click here](#) to read Stewardship's privacy policy.

We compile reports of all donations received through these different mechanisms.

If you choose to donate anonymously, we will not have any of your personal details. We will only know the date and amount of your donation. If you have donated through our website or another website, we may receive a personal identity number which would enable the other company to answer any particular questions about your gift.

If you give permission for RSN to get in touch with you when you donate through our website or another website, we will share our full privacy notice with you when we thank you for your gift. At this stage, we also give you the opportunity to sign up for our email newsletter and/or to receive bespoke emails. We will only use the information you give us at the point of your donation to contact you again (for example about events and further opportunities to support our work) if you give us your consent. You can choose to stop hearing from RSN at any point by contacting us.

We will keep your information for 6 years from the point of your last donation to claim Gift Aid (where applicable), to review giving trends and to refer back for accounting purposes.

Occasionally, we take time to learn more about our donors to, for example, understand how you might be able to support us in the future, to communicate with you in the best possible way and to help us grow our network of supporters. To do this, we may look at information you've given us, sometimes in combination with publicly available information, to profile your interests,

connections and potential levels of support. You can opt out of this at any time, by contacting us on privacy@refugeesupportnetwork.org or by post at the address in section 6.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.3 “I've visited your website. What information do you have about me and what will you do with it?”

When you visit our website, we use Google Analytics to allow us to track how popular our site is and to record visitor trends over time. This enables us to improve the way we communicate about our work. Google Analytics uses cookies, which are stored on users' computers, to generate statistical information. The information collected through cookies is not personally identifiable and is stored by Google. Google Analytics will automatically delete user and event data that is older than 26 months. [Click here](#) to read Google's privacy policy, which includes information about how to access an Google Analytics opt-out browser add-on.

From time to time, we embed external content from third party websites (e.g. YouTube) within our website. These websites may also use cookies and you will need to refer to their privacy notices for more information. RSN's website may also contain links to other websites of interest. However, once you have used these links to leave our site, you'll no longer be covered by this privacy statement and we are unable to give any assurances about how your data will be used. You should exercise caution and look at the privacy statement applicable to the website in question.

Our website gives you opportunities to interact directly with RSN by emailing staff members, filling in an enquiry form or making a donation to our work. For information about donations to RSN, see section 8.1 above.

If you send us a message via our '[send us a message' form](#), we ask for your name and contact details and use this information to respond to your enquiry. If, at the time of completing our online enquiry form, you tick the box to say you'd like to receive occasional updates from RSN, we'll send you a sign up link to our mailing list. You can unsubscribe from these updates at any time. If you do not tick this box, we'll only be in touch with you to answer your particular enquiry. When you complete our [send us a message' form](#), your data is stored by our website provider, White Fuse Media. [Click here](#) to read their privacy policy. We will delete information provided through this section of our website three years after your enquiry.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your information, we cannot guarantee the security of your information transmitted to our website. Any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.4 I've come to you for help and support. What information do you have about me and what will you do with it?"

We run a range of programmes to support young refugees and asylum seekers with their education. Young people can refer themselves to these services, for example by contacting our higher education helpline, or be referred to us by other professionals, such as teachers or social workers. We also receive personal information from the Schwab & Westheimer Trust with whom we work in partnership.

When you come to RSN for help, we need ask you for some personal information so that we can provide you with advice and support. This information also enables us to monitor and improve the effectiveness and impact of our services for you and for others. At every stage of our interactions with you, we only ask for information that is relevant to give you the help you need. You do not have to give us any personal data if you don't want to.

The personal information we ask for will vary depending on what you need help with. Because of this, we have separate privacy notices for different programmes. You will always receive a copy of the relevant privacy notice and will have the opportunity to ask questions until you completely understand.

We won't share your information with anyone without informing you or seeking your permission, unless we are required to do so by law or for your own protection.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.5 “I’ve applied to work at RSN. What information do you have about me and what will you do with it?”

When you apply to work for RSN we ask for a range of relevant personal data, including your name, contact details and employment history. This information may be included in your CV, application form and cover letter.

We collect your personal information through [CharityJob](#) and/or directly by email. Please refer to [CharityJob’s privacy policy](#) for information about how they use and store your data. Job applicants will only receive communications from us that are relevant to their applications and their data will not be shared outside RSN.

If you are unsuccessful, we will destroy or delete any electronic and hard copy records of your personal data after 6 months.

If you are a shortlisted candidate, we will also ask for references and signed a self declaration form as part of our safer recruitment policy.

If you are offered a position which is subject to a DBS check, we will ask you to provide further details to CCPAS who carry out DBS checks on our behalf. [Click here](#) to read CCPAS’s privacy policy. The results of your DBS check will be shared with RSN.

If you are employed by RSN, you become a member of our team and you will be given a separate privacy notice about how we use and share your personal data.

You have numerous rights about how your data is processed and who to talk to if you’re worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner’s Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.6 “I’ve applied to volunteer at RSN. What information do you have about me and what will you do with it?”

People who are interested in volunteering with RSN as educational mentors are invited to complete an enquiry form. The form asks for personal information including your name, contact details, age and geographical location. We use the information to assess the suitability (such as skill set and geographical location) of potential volunteers for a mentoring role. The information will be kept for 3 years after the date of submission and will be used only within RSN. Your information will not be shared externally.

When mentoring opportunities arise, we may invite potential volunteers for a fuller assessment, including the completion of a more detailed application form. Once you start volunteering with us, we will keep your information for 6 years after the date you stop volunteering as a mentor with RSN. Your name, email address and phone number may be shared with your potential mentee.

The educational mentor role is subject to a DBS check. To complete this, we will ask you to provide further details to CCPAS who carry out DBS checks on our behalf. [Click here](#) to read CCPAS's privacy policy. The results of your DBS check will be used only within RSN. Your information will not be shared externally.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.7 "I work for RSN. What information do you have about me and what will you do with it?"

If you work for RSN, we'll treat your personal data with the same care as all other personal data we hold in paper and electronic form.

We use your personal data to administer payroll, pensions, training and appraisal, to monitor equal opportunities and diversity, to manage access to various services such as IT and the office space and to comply with legal obligations, policies and procedures.

If you work 1:1 with young people, your role may be subject to a DBS check. To complete this, we will ask you to provide your name and other details to CCPAS who carry out DBS checks on our behalf. [Click here](#) to read CCPAS's privacy policy. The results of your DBS check will be used only within RSN. Your information will not be shared externally unless required by law.

G Suite for Nonprofits provides our IT services such as email, document creation and storage, calendars and meetings. Your name, email address and mobile number will be shared with, and held by, Google so that you can have access to our IT services. Google may have access to other personal data, for instance if you store private files in the RSN Drive, send private messages through your RSN email account or save private appointments in your RSN calendar. [Click here](#) to read Google's privacy policy.

Your RSN email address, RSN phone information and calendar will also be shared internally. Your personal email address and phone number will not be shared internally without your permission. As part of our health and safety policy, we display photos of team members in the office entry area.

We use WhatsApp for internal messaging and chat, through which your RSN mobile number (and photo, if you add it) is shared with other team members. You can choose whether to add your personal mobile number to Whatsapp. [Click here](#) to read WhatsApp's privacy policy.

We use Trello to collaborate across programmes and the organisation, through which your RSN email address is shared. [Click here](#) to read Trello's privacy policy.

Santander provides our day-to-day (and online) banking services. We will share your name and bank account details in order to pay you. We will share more information with Santander if you have access to the RSN account. [Click here](#) to read Santander's privacy policy.

Civi CRM hosted by GMCVO provides our database services. We will share your name and RSN email address with GMCVO to activate your access to GMCVO. [Click here](#) to read GMCVO's privacy policy.

ClearBooks provides our accounting and payroll services. We will share your name, personal email and mailing addresses, salary information and other information required to administer payroll. [Click here](#) to read ClearBooks' privacy policy.

Sometimes we will pass information about you to third parties, where the law allows it. For example, we will:

- provide your information to NEST for auto enrollment into the pension scheme, if you are eligible ([click here](#) to read NEST's privacy policy)
- provide your information (and information about your dependents) to Simplyhealth for enrollment into the cash health plan if you have given us permission ([click here](#) to read Simplyhealth's privacy policy)
- confirm the dates and nature of your employment here to a prospective employer if you have given us permission at the time you leave RSN
- transfer personal information to others as required by our legal, regulatory, compliance and auditing needs.

If you leave RSN (which will be sad and exciting, all at the same time!), your personnel file is audited for relevant data and kept for 6 years from the date you leave. After this, your name and dates of employment may be kept in a staff archive. If you were a member of a pension scheme, some information will be kept longer to allow payment of a pension.

You have a right to see all the information that we keep about you. This includes, for example, your employee information form, leave records, sickness self certifications and review and appraisal information.

You can always speak with your manager or the operations manager if you have any questions.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.8 "I follow you on social media. What information do you have about me and what will you do with it?"

RSN has accounts on social media sites, through which people can follow RSN, like and share information we post, access our website and get in touch with our team. These include:

- Facebook ([refugee.support.network](#)). [Click here](#) to read Facebook's privacy policy.
- Instagram ([rsn_uk](#)). [Click here](#) to read Instagram's privacy policy.
- LinkedIn ([Refugee Support Network](#)). [Click here](#) to read LinkedIn's privacy policy.
- Twitter ([@Refugee_Support](#)). [Click here](#) to read Twitter's privacy policy.

Your personal information is held by these websites and we can only access the information that you have chosen to make publicly available. These social media platforms enable RSN to contact you directly and you can change your settings on these platforms at any time. Please refer to their privacy policies for more details.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.9 "I have come to an RSN training session. What information do you have about me and what will you do with it?"

RSN runs training sessions for other professionals and organisations to equip them to support young refugees as well as possible.

If you book onto an RSN training session directly, we will ask you to provide basic information about yourself so that we can send you details about the training session and collect payment. We will keep your information for 3 years after the date of the training session you participated in.

If you attend an in-house training session, organised by someone in your institution, we will receive the personal data that your institution shares with us

If you organised an in-house training session, we ask for information about you, to help us schedule the training session and collect payment. We will keep your information for 3 years after the date of the training session you organise.

We record some of the information provided on feedback forms (such as job titles, institutions and quotes) to monitor and improve the effectiveness of our training. We also use quotes from our feedback forms to promote our training, but do so in an anonymised way unless we have your explicit consent to cite you by name.

After our training sessions, all participants will be given the option to sign up to stay in touch with us. We will only contact you again in the future if you sign up.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.10 “You have asked to use a photo or video of me. What will you do with it?”

RSN occasionally asks staff, volunteers and young people for permission to use their photos (and other media such as videos and audio recordings) to promote the work we do. Photos and other media are a helpful way of enabling our supporters to engage with our work and understand its impact.

Please refer to our photography and other media policy which can be found on the privacy page of our website.

8.11 I've applied for a Westheimer (or associated) Scholarship or Schwab grant. What information do you have about me and what will you do with it?"

We run a range of programmes to support young refugees and asylum seekers with their education. Within our higher education programme we support the Schwab & Westheimer Trust to provide scholarships and grants to young people seeking to access higher education.

When you apply for a grant or scholarship you give your personal data to the Schwab & Westheimer Trust. The Schwab & Westheimer Trust is the data controller, and applicants and scholars should refer to the Schwab & Westheimer Trust's privacy policy for information about how their data will be used and who to contact if they have questions.

RSN is a data processor for the Schwab & Westheimer Trust. At the Schwab & Westheimer Trust's request, RSN processes, uses and securely stores applicants' and scholars' personal data. As a data processor, we do not own this data and do not use it for our own purposes. RSN will not share this data unless on the specific instruction of the Schwab & Westheimer Trust and will return or delete the data at their request.

If you are an applicant or scholar and need additional help from RSN (for example, through phone advice or face-to-face support sessions), we will need to ask you for some personal information. We will use this information to provide you with advice and support. This information also enables us to monitor and improve the effectiveness and impact of our services for you and for others. At every stage of our interactions with you, we only ask for information that is relevant to give you the help you need. You do not have to give us any personal data if you don't want to. We keep the information you share with us for 6 years from the date of your last contact with RSN.

If you are an applicant or scholar who did not need additional help from RSN, we will contact you when you complete your studies to ask if you want to hear from RSN after graduation.

We won't share your information with anyone else without informing you or seeking your permission, unless we are required to do so by law or for your own protection.

You have numerous rights about how your data is processed and who to talk to if you're worried. Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner's Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.

8.12 “I’ve contacted your higher education advice line (by phone or email). What information do you have about me and what will you do with it?”

When you get in touch with RSN’s advice line, we may ask you for some personal information such as your name, age, educational background and immigration status. If you do not want to give us any personal information, we can provide general advice. If you give us your personal information, we will use it to provide you with personalised advice and support. We will only ask for information that is relevant to give you the help you need. You do not have to give us any personal data if you don’t want to.

We won’t share your information with anyone outside RSN without your permission, unless required by law or for your own protection. We keep the information you share with us for 6 years from the date of your last contact with RSN.

You have numerous rights about how your data is processed and who to talk to if you’re worried.

Please refer to section 7 above for information about your rights and how to complain if you need to. If you are not satisfied with the way that we handle your request, you can complain to the Information Commissioner’s Office (ICO). Their contact details can be found here: <https://ico.org.uk/concerns/>.