

Data Protection Policy

Last updated	18.05.2018
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Definitions

Charity	Means Migrant Voice a charity registered in England, UK.
GDPR	Means the General Data Protection Regulation.
Responsible Person	Means the Executive Director of the Charity or if that position is vacant then the highest ranked administrative official of the Charity.
Data Register	Means a register of all data systems or contexts in which personal data is processed by the Charity.
ICO	Means the Information Commissioner's Office

1. Data protection principles

Migrant Voice is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires personal data to be:

- processed lawfully, fairly and in a transparent manner in relation to individuals;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research

purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. 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.”

2. General provisions

- a. This policy applies to all personal data processed by Migrant Voice.
- b. The Responsible Person is responsible for Migrant Voice’s ongoing compliance with this policy.
- c. Migrant Voice reviews this policy annually.

3. Lawful, fair and transparent processing

- a. Migrant Voice maintains a Data Register to ensure its processing of data is lawful, fair and transparent.
- b. We review the Data Register annually.
- c. Anyone whose personal data is processed by Migrant Voice has the right to access their personal data. We aim to deal with data access requests soonest possible and in any event not later than 30 days of your request.

4. Lawful purposes

- a. Migrant Voice does not process your personal data unless we consider it necessary to do so, in which case we apply targeted and proportionate ways to achieve that purpose.
- b. Where possible, we will use less intrusive means to achieve that purpose.
- c. Migrant Voice processes all personal and special data on at least one of the following lawful bases:
 - **Consent:** where you have given your clear consent for Migrant Voice to process your personal data for a specific purpose.
 - **Contract:** where the processing is necessary for a contract Migrant Voice has with you, or because you have asked us to take specific steps before entering into a contract.
 - **Legal obligation:** where the processing is necessary for Migrant Voice to comply with the law (not including contractual obligations).
 - **Vital interests:** where the processing is necessary to protect someone’s life.
 - **Public interest task:** where the processing is necessary for Migrant Voice to perform a task in the public’s interest or for Migrant Voice’s official functions, and the task or function has a clear basis in law.
 - **Legitimate interests:** where the processing is necessary for Migrant Voice’s legitimate interests or the legitimate interests of a third party unless there is

a good reason to protect your personal data and that good reason overrides those legitimate interests.

We follow this process to ensure your data is processed in a fair and ethical manner and complies with the GDPR as well as the ICO's guidelines.

- d. Migrant Voice notes the appropriate lawful basis for processing personal and special data in the Data Register so it is always evident to our personnel and auditors why we are processing such data.
- e. Where Migrant Voice relies on your consent for processing data, we shall keep evidence of your opt-in consent.
- f. Where Migrant Voice sends you communications based on your consent, we will ensure your option to revoke that consent is also clearly available.
- g. Migrant Voice will also ensure your revocation is reflected accurately in our systems.

5. Data minimisation

- a. Migrant Voice shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. Migrant Voice takes reasonable steps to ensure personal data is accurate.
- b. Migrant Voice has established steps to ensure that personal data is kept up to date.
- c. Migrant voice has put in place procedures to deal in a timely manner with your requests for your personal and special data to be deleted or modified.
- d. Please contact us for any of the following:
 - to enquire what of your personal data we hold and how we use it;
 - to request us to correct, amend or delete your personal data
 - to restrict or object to our use of your personal data
 - to withdraw your consent to the use of your personal data

7. Archiving / removal

- a. Migrant Voice does not believe we should hold your personal data for longer than necessary. We therefore have in place an archiving plan for each area in which we process personal data. We review this process annually.
- b. Our archiving plan considers what data should/must be retained, for how long, and why.

8. Security

- a. Migrant Voice ensures personal data is stored securely including using modern software that is kept-up-to-date.
- b. Migrant Voice limits access to personal and special data to personnel who need to process that data and who have the appropriate authorisation to do so.

- c. We have organisational security features in place to avoid unauthorised sharing of information.
- d. Migrant Voice ensures your personal data is deleted safely such that the data is irrecoverable.
- e. Migrant Voice has in place appropriate back-up solutions.

9. Breach

- a. In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, Migrant Voice will promptly assess the risk to your rights and freedoms.
- b. Where appropriate, Migrant Voice will report such breach to the ICO and where feasible, will aim to do so without undue delay and ideally within 72 hours after becoming aware of it.
- c. Where Migrant Voice believes the breach is likely to cause high risk to your rights and freedoms, we will inform you of the breach immediately.
- d. Migrant Voice has internal procedures to detect, investigate and report breaches.
- e. Migrant Voice keeps a record of any personal data breaches, regardless of whether we are required to notify.

10. Complaints and Contacts

- a. You may contact at any point to raise complaints with us or with a supervisory authority including the ICO. If you have any complaints, we would like to hear from you and encourage you to contact us.

Migrant Voice, VAI, 200a Pentonville Road, London N1 9JP

Office telephone: 07467 299 335

Working hours: 10-6 Monday – Friday

www.migrantvoice.org

@MigrantvoiceUK

- b. If you would like to raise concerns with the ICO or if you are still unsatisfied after your complaint to us and need to appeal outside our organisation, please contact the ICO.

Information Commissioner's Office, website: <https://ico.org.uk/concerns/> or

Helpline: 0303 123 1113.

END OF POLICY

