



Policy 23

GDPR (Fair Processing Notice- Privacy) Policy

AUTHORISED BY	Kate Bennett
DATE POLICY ADOPTED BY DPIA BOARD	12.09.2018
POLICY REVIEW DATE	02.01.2023

Registered Charity 1117456

1. Scope

This notice applies to all data subjects whose data is processed by Displaced People in Action.

2. Responsibilities

The Senior Information Risk Owner (SIRO) is responsible for ensuring that all potential data subjects have sight of this notice prior to the collection and/or processing of their personal data by Displaced People in Action.

All employees of Displaced People in Action who interact with data subjects are also required to ensure that this notice is brought to the attention of all data subjects, securing their consent for the processing of their personal data.

3. Fair Processing Notice for

Vulnerable Person Relocation Scheme (VPRS)

With your consent, Displaced People in Action will use the personal data collected from you for the following purposes for Vulnerable Person Relocation Scheme.

- Contacting your housing provider on your behalf,
- Liaising with DWP, schools, your health Centre,
- Completing various application forms requested by you such as discount schemes, travel document,
- Liaising with the Home Office and the relevant County Councils,
- Calling emergency services on your behalf,
- Liaising with various training, employment and volunteering agencies

Asylum Rights Project

Data is only used for the following reasons, as part of the remit of the ARP Project element run by DPIA.

- To contact individuals about Speaking Opportunities within ARP
- To contact individuals about Advocacy Forum Opportunities within ARP
- To contact individuals about external consultations/ opportunities
- To inform individuals of training opportunities
- To be used in case of a medical emergency

- To report to Welsh Refugee Council and subsequently Welsh Government on the Protected Characteristics of beneficiaries of the project
- To ensure compliance with the Equality Act 2010
- To ensure compliance with Safeguarding and Protection of Children and Vulnerable Adults
- To ensure compliance with the GDPR

Children and Young Persons Project

- To update you about any changes or cancellations within the Children and Young Persons Project that you and your family have registered with.
- To let you know about any other services, provisions and projects that DPIA are offering (that might be of interest to you/ your family).
- To let you know about upcoming events and activities that we think you/ your family may be interested in.
- To continue providing you/ your family with any ongoing support you/ your family may be receiving from DPIA.

WARD Group

- Contacting various agencies on your behalf such as the Wales Deanery
- Signing you up for the WARD Scheme as a learner
- Sharing your personal data with the Wales Deanery such as; your name and surname, your date of birth, phone number, your immigration status, your country of origin, most senior medical or dental qualification that you possess and if you have sat IELTS, PLAB before.
- Occasionally reimbursement of other costs related to the provision of this scheme such as GMC registration for WARD members, exam fees, etc.

Requirements from our funders or the contract comes to an end, the third party will dispose of all personal data according to our procedures. We will never share your personal data with third parties until we have received your consent; unless we are required do so by law.

You hereby confirm that you are consenting to Displaced People in Action's use of your personal data for the aforementioned purposes(s) and are granting Displaced People in Action permission to carry out those actions and/activities.

You may withdraw your consent at any time by reading our GDPR policy.

4. What is Personal Data?

The EU's General Data Protection Regulation ("GDPR") defines "personal data" as:

"any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

The GDPR classifies certain data as belonging to "special categories", as follows:

- Racial origin;
- Ethnic origin;
- Political opinions;
- Religious beliefs;
- Membership to a trade-union;
- Genetic data;
- Biometric data;
- Health data;
- Data concerning a natural person's sex life;
- Sexual orientation; and
- Other.

The GDPR requires that consent is provided by the data subject for all types of personal data, including those pertaining to the special categories set out above and otherwise. Consent must be explicitly provided.

When Displaced People in Action requests sensitive data from data subjects, it is required to confirm why the information is required and how it will be used.

5. Why does Displaced People in Action need to collect and store personal data?

Displaced People in Action is committed to ensuring that all personal information collected and processed is appropriate for the stated purpose(s) and shall not constitute an invasion of your privacy. We may share your personal data with third party service providers who are contracted by us and we shall ensure that they will hold your personal data securely and shall use it only in order to fulfill the service for which they are contracted. When there is no longer a service need,

6. How Displaced People in Action uses your information

Displaced People in Action will process your data (i.e. collect, store and use) according to the requirements of the GDPR at all times and shall endeavor to keep your personal data up-to-date, ensuring its accuracy and will not keep it for longer than it is required. In some situations, there are set legal requirements for the length of time that Displaced People in Action will retain your

personal data but usually Displaced People in Action will use its discretion, ensuring that personal data is not kept outside of our usual business requirements.

We shall never be intrusive or invasive of your personal privacy and shall not ask you to provide data that is irrelevant or unnecessary and we will enact strict measures and processes to ensure that the risk of unauthorized access or disclosure of your personal data is minimised as much as possible.

We will only use your personal data for the following purposes:

- We may wish to contact you to take part in some independent research or to provide you with specific advice around future services
- Help with crime prevention and the prosecution of offenders
- Provide you with welfare services including advice and appropriate support
- Carry out research and to provide anonymised information to help improve our services and direct funds to the most appropriate areas
- To apply for funding using anonymised such as using evaluation and monitoring forms to improve our services and apply for funding for new services relevant to your needs and aspirations
- To protect individuals from harm
- Ensure that we meet all our legal and statutory duties such as those which apply under the Equality Act 2010.
- We may sometimes need to share the personal information we process with other organisations where it is necessary to fulfil a contract

We will not share your information with third parties for marketing purposes.

7. Document owner

The is the owner of this policy document and must ensure that it is periodically reviewed according to the review requirements contained herein.

This policy document was approved by Displaced People in Action's Board of Directors and is issued by the Chair of DPIA'S Board of Directors on a version controlled basis.

Chair of Board of Directors: Kate Bennett

Date:

Change history record

Issue	Description of Change	Approval	Date of Issue
1			
2			
3			