



CONFIDENTIALITY AND PRIVACY POLICY STAFF, TRUSTEES, VOLUNTEERS AND CHEFS

This confidentiality policy applies to people working or volunteering with Migrateful: staff; trustees; volunteers; trainee chefs and trained chefs (all referred to collectively as “colleagues”). For our privacy policy as it applies to customers please see our Customer Privacy Policy.

1. General confidentiality principles

Migrateful recognises that employees, volunteers and trustees gain information about individuals and organisations during the course of their work or activities. In most cases such information will not be stated as confidential and they must exercise common sense and discretion in identifying whether this information should be communicated to others. Information given in confidence must not be disclosed without consent unless there is a justifiable reason e.g. a requirement of law or an overriding public interest to do so.

Confidential information includes anything that contains the means to identify a person, e.g. name, address, post code, date of birth, National Insurance Number, passport and bank details. It includes information about sexual life, beliefs, commission or alleged commission of offences and other sensitive personal information. It also includes information about organisations such as confidential business plans, financial information, contracts, trade secrets and procurement information.

Colleagues should seek advice from a manager about confidentiality and sharing information as necessary.

Colleagues will avoid discussing confidential information about organisations or individuals in social settings.

Colleagues will not disclose to anyone, other than their manager, any information considered sensitive, personal, financial or private without the knowledge or consent of the individual, or an officer, in the case of an organisation.

Where there is a statutory duty on Migrateful to disclose information, the person or people involved will usually be informed that disclosure has or will be made unless this would put at risk the safety of any individual or jeopardise a potential criminal investigation. Details about disclosure of information and who has been informed will always be kept on record and stored securely with restricted access.

Confidential information will be stored securely and will be password protected.

2. Duty to disclose information

There is a legal duty to disclose some information:

- Vulnerable adult abuse will be reported to the relevant statutory services
- Drug trafficking, money laundering or acts of terrorism will be disclosed to the police.

In addition, colleagues believing an illegal act has taken place, or that someone is at risk of harming themselves or others, must report this to the Chief Executive who will report it to the appropriate authorities.

The person concerned should be informed of this disclosure unless this would put at risk the safety of any individual or jeopardise a potential criminal investigation. Details about disclosure of information and who has been informed will always be kept on record and stored securely with restricted access.

3. Disclosures

Migrateful complies fully with the DBS Code of practice regarding the correct handling, use, storage, retention and disposal of DBS information.

Disclosure information is always kept separately from an applicant's personnel file in secure storage with access limited to those who are entitled to see it as part of their duties. It is a criminal offence to pass this information to anyone who is not entitled to receive it.

Documents will be kept for a year and then destroyed by secure means. Photocopies will not be kept. However, Migrateful will keep a record of the date of issue of a Disclosure, the name of the subject, the type of Disclosure requested, the position for which the Disclosure was requested, the unique reference number of the Disclosure and the details of the recruitment decision taken.

PRIVACY

1. Your Rights

As a data subject, staff, trustees, volunteers and chefs ("You") have the following rights under the GDPR, which this Policy and Migrateful's ("Our") use of personal data have been designed to uphold:

The right to be informed about our collection and use of personal data;

The right of access to the personal data we hold about you (see section 7);

The right to rectification if any personal data we hold about you is inaccurate or incomplete (please contact us using the details in section 9);

The right to be forgotten – i.e. the right to ask Us to delete any personal data we hold about you (we only hold your personal data for a limited time, as explained in section 6 but if you would like us to delete it sooner, please contact us using the details in section 9);

The right to restrict (i.e. prevent) the processing of your personal data;

The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation);

The right to object to us using your personal data for particular purposes; and

Rights with respect to automated decision making and profiling.

If you have any cause for complaint about our use of your personal data, please contact us using the details provided in section 14 and we will do our best to solve the problem for you. If we are unable to help, you also have the right to lodge a complaint with the UK's supervisory authority, the Information Commissioner's Office.

For further information about your rights, please contact the Information Commissioner's Office or your local Citizens Advice Bureau.

2. What Data Do We Collect?

Depending upon your role and your use of our website, for volunteers, staff, trustees and chefs we may collect some or all of the following personal and non-personal data:

name;
date of birth;
gender;
contact information such as email addresses and telephone numbers;
personal preferences such as interests and dietary requirements;
details of work carried out, training attended;
performance reviews and comments;
salary and tax records (where relevant).

In addition, for our chefs we will also record:

Legal status and country of origin;
Relevant information on particular health issues or requirements.

3. How Do We Use Your Data?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply with our obligations and safeguard your rights under the GDPR at all times. For more details on security see section 7, below.

Our use of your personal data will always have a lawful basis, either because you have consented to our use of your personal data (e.g. by subscribing to emails), or because it is in our legitimate interests. Specifically, we may use your data for the following purposes:

- To track performance;
- To send information and newsletters;
- For chefs, to enable Migrateful to understand the history and activities of individuals in order to understand our impact and deliver the most appropriate services.

Information about protected equality characteristics of users is kept for the purposes of monitoring our equal opportunities policy and also for reporting back to funders.

You have the right to withdraw your consent to Migrateful using your personal data at any time, and to request that it is deleted.

Migrateful will keep this data for as long as necessary to fulfil the purposes above or for as long as we are required by law. After this personal data will be deleted.

4. How and Where Do We Store Your Data?

We only keep your personal data for as long as we need to in order to use it as described above in section 6, and/or for as long as we have your permission to keep it.

Some or all of your data may be stored outside of the European Economic Area (“the EEA”) (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). Colleagues are deemed to accept and agree to this by submitting information to us. If we do store data outside the EEA, we will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

5. Do We Share Your Data?

We may sometimes contract with third parties to supply products and services to you on our behalf. These may include payment processing and marketing. In some cases, the third parties may require access to some or all of your data. Where any of your data is required for such a purpose, we will take all reasonable steps to ensure that your data will be handled safely, securely, and in accordance with your rights, our obligations, and the obligations of the third party under the law.

You may have passed personal details to us via our website. We may compile statistics about the use of our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

In certain circumstances, we may be legally required to share certain data held by us, which may include your personal data, for example, where we are involved in legal proceedings, where we are complying with legal requirements, a court order, or a governmental authority.

6. How Can You Control Your Data?

In addition to your rights under the GDPR, set out in section 4, when you submit personal data via our Site, you may be given options to restrict our use of your data. In particular, we aim to give you strong controls on our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from us which you may do by unsubscribing using the links provided in our emails and at the point of providing your details).

7. How Can You Access Your Data?

You have the right to ask for a copy of any of your personal data held by us (where such data is held). Under the GDPR, no fee is payable and we will provide any and all information in response to your request free of charge. Please contact us for more details at info@migrateful.org, or using the contact details below in section 8.

8. Contacting Us

If you have any questions about this Privacy Policy, please contact us by email at info@migrateful.org. Please ensure that your query is clear, particularly if it is a request for information about the data we hold about you.

9. Changes to Our Privacy Policy

We may change this Privacy Policy from time to time (for example, if the law changes). Any changes will be immediately posted on our website and you will be deemed to have accepted the terms of the Privacy Policy on your first use of our website following the alterations. We recommend that you check regularly to keep up-to-date.

