SWVG POLICY

Privacy Policy

For people who use our services

This Privacy Policy applies to personal information that SWVG holds about you, if you use our services.

The Southampton and Winchester Visitors Group (SWVG) needs to hold personal information so that we can help you. We know that it is important to keep your information safe and private.

The Privacy Policy explains:

- What personal information we hold, how we use it and how we keep it safe.
- When we need your consent to hold this information.
- When we need your consent to share this information with other organisations.
- How we delete your information when it is no longer needed.
- Your rights about your personal information.

'Personal Information' is any information about an identifiable living person.

Privacy Notice: this Privacy Policy is also sometimes called a Privacy Notice and is required by UK law.

> SWVG CONTACT DETAILS
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> If you have any comments or questions about this policy, please speak to your visitor if you have one; or email the **SWVG Privacy Representative** at privacy@swvg-refugees.org.uk; or speak to someone at the SWVG desks at Winchester or Southampton ('Help Desk').

Language translation

If you do not read English, your SWVG contact will explain this policy to you, with an interpreter if necessary.

Basic personal information that we need so that we can help you

- Your name and contact details (such as your address, email, phone number).
- Your nationality.
- Your asylum status and information about your asylum claim.
- The name and contact details of your solicitor, if any.
- Whether you have anywhere to live.
- Whether you have any money to live on.

This is information that we need so that:

- We know who you are.
- We can contact you.
- We can understand what help you may need.
- We can see if we are able to help you.

The lawful basis for us holding this information about you is called 'legitimate interests' and we need to hold it so we are able to help you.

Some information, such as details of your asylum claim or your health, is especially sensitive because it may reveal things such as your religion, political opinions, sexual orientation or medical conditions. The law calls this 'special category' information. We will only hold this kind of information with your explicit consent, which we will ask you to give in writing.

Information about the help that we give you

If you get money, accommodation or other help from SWVG, we need to record this and maintain our financial accounts, in accordance with our 'legitimate interests' and as required by law. We may also need to keep information about how to provide money to you.

Other information for which we need your consent

We may hold other personal information which would help us to support you better if you give us your consent in writing. These are some examples:

- Whether you have any illness, disability or particular medical needs.
- Copies of letters, emails or other communications about you with other organisations such as the UK Home Office, your solicitor, British Red Cross, your GP (doctor), ClearSprings, Migrant Help.
- The names of people in your family and how to contact them.
- Permission to contact you about SWVG social events and activities.

The lawful basis for holding this sort of information is 'consent'.

Who can see your personal information?

Not everyone in SWVG can see your personal information. It will be seen only by people who need to know so that they can help you or so that they can manage SWVG. These people are:

- your visitor (if you are allocated one), and their support group,
- the Co-ordinators and Help Desk team,
- the Teaching Co-ordinator and any teacher allocated to you,
- the Trustees and SWVG committees that decide on the help that you need,
- the Administrator, the Secretary, and the Treasurer.

All information will be shared in a thoughtful and respectful way, in line with SWVG's privacy policy and with the prime objective of supporting you in the best way possible.

Consent Form

There is a Consent Form which a member of SWVG will explain to you and ask you to sign, if you agree to do so.

Sharing your information with other organisations, for which we need your consent

We may sometimes share your information with other organisations if we consider that this is necessary to help you, for example CLEAR, British Red Cross, ClearSprings or your solicitor. We only do this if you give us your consent in writing.

Your visitor or the Help Desk team will discuss any sharing with you beforehand each time, except in an emergency when SWVG considers that it is in your best interests (for example to contact your solicitor if you have been detained by the Home Office).

The lawful basis for sharing this sort of information is 'consent'. If we share information without your consent in an emergency, the lawful basis is our 'legitimate interests', or 'vital interests' where this is needed to protect someone's life.

Communications with government organisations such as the Home Office should usually be done on your behalf by your solicitor; it will not be done by SWVG unless requested by you or required by law.

Information used in SWVG reports

SWVG needs information to manage our activities, such as for our financial accounts and our annual report. Such information will be anonymous. It will not be possible to identify you.

If SWVG wants to include any personal information in reports that could be used to identify you, such as photographs, then this will only be done if you consent. There is a special consent form to sign.

Photographs

SWVG will not photograph you or use a photograph of you unless you give your consent in writing each time. There is a special form for consent for photographs which a member of SWVG will explain to you and ask you to sign, if you agree to do so. If a photograph has already been published with your consent, then it may not be possible to remove it.

How we store your personal information

SWVG takes reasonable steps to ensure that your personal information is kept securely and is protected from unauthorised access, use or disclosure.

SWVG stores information on computer in our cloud-based password-protected IT systems (Google Workspace, including Gmail and Google Drive, and Charitylog). Some of our providers may store information outside the UK; where they do, appropriate safeguards are in place. Information on paper is stored securely.

SWVG volunteers are required to keep information secure. For example, any smart-phone, laptop or computer should be protected by a password.

How long we keep your personal information

We will keep your personal information only for as long as we consider it necessary to carry out each activity. We take account of legal obligations and accounting and tax considerations as well as considering what would be reasonable for the activity concerned.

For example, your visitor or teacher will keep information for up to one year after you stop using their services. Information held by the SWVG Co-ordinator, Teaching Co-ordinator, Administrator, Secretary and Treasurer will be kept for up to six years.

At the end of this time, personal information held on computer will be securely deleted. Personal information on paper will be shredded unless we can give it back to you.

Where personal information is collected on the basis of consent, we will seek renewal of your consent at least every three years if we can contact you.

Rights you have over your personal information

Your rights include:

- You have the right to see your information.
- Where data processing is based on consent, you may withdraw this consent at any time.
- You have the right to ask for information to be corrected and/or erased.
- You have the right to object to us using your information, and to ask us to restrict how we use it.
- You have the right to ask for a copy of information you have given us in a format that can be passed to another organisation.
- You have the right to complain to SWVG about how we handle your personal information, by emailing privacy@swvg-refugees.org.uk or following the SWVG Complaints Policy. If you are not happy with our response, you can complain to the Information Commissioner's Office (ICO).

A summary of your legal rights over your data can be found on the Information Commissioner's website here: https://ico.org.uk/

If you would like to access the rights listed above, or any other legal rights you have over your data under current legislation, please speak to your visitor or to the SWVG Administrator or to the SWVG Privacy Representative (privacy@swvg-refugees.org.uk).

Using some of these rights, such as the right to delete your data, may affect the services that we are able to give you.

References

This policy has been prepared with reference to guidance provided in:

- The Information Commissioner's Office guidance on the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025: https://ico.org.uk/
- Charity Finance Group guidance on data protection for charities: https://cfg.org.uk/

Modifications

We may modify this Privacy Policy from time to time and will publish the most current version on our website. If a modification meaningfully reduces your rights, we will notify people whose personal data we hold and are affected.