SWVG POLICY

Privacy Policy

For contracted staff, volunteers, friends, donors, applicants and other people who do not use our services

The Southampton and Winchester Visitors Group (SWVG) needs to hold certain personal information (data) so that we can fulfil our charitable purposes. We know that it is important to keep your information safe and private.

The Privacy Policy explains:

- What types of personal information we hold, how we use it and how we keep it safe.
- The 'lawful basis' for holding this information and whether we need your consent.
- The circumstances in which we may need 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.

'Processing' of personal information includes such things as collection, storage, use, or otherwise making available, restriction, erasure or destruction.

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

> SWVG CONTACT DETAILS
>
> If you have any comments or questions about this policy, please contact the **SWVG Privacy Representative** at privacy@swvg-refugees.org.uk

Purposes

We collect and use people's personal information only so far as we consider it necessary to carry out our activities to fulfil the overall Objects stated in SWVG's constitution and the particular purposes listed in Schedule A below.

Lawful basis

The 'lawful basis' for processing your personal information depends on each particular purpose and is one of the following:

Consent	You have given clear consent for us to process your personal information for specific purposes.
Contract	The processing is necessary for a contract we have with you.
Legal obligation	The processing is necessary for us to comply with the law.
Legitimate interests	The processing is necessary for our legitimate interests or the legitimate interests of a third party.

Consent

SWVG contracted staff, volunteers and trustees are asked to sign a general consent form (as part of your application) for the relevant purposes listed in Schedule A below. Volunteers, trustees and contracted staff are also asked for explicit consent to SWVG holding any special category information (such as health information) they give us about themselves, to be shared within SWVG on a need-to-know basis only.

Consent from other individuals, such as friends and speakers or attendees at events, may be requested and recorded for some particular purposes listed in Schedule A below.

DBS checks. If your role needs a Disclosure and Barring Service (DBS) check, we will ask for your consent before applying. In our database we record only the level of check, whether you are registered with the DBS Update Service, the certificate number, the date it was issued and when a re-check is due. We do not keep copies of certificates or details of what they contain.

Who can see your personal information?

Within SWVG the people who have access are those who need it to carry out their particular role within SWVG.

Sharing your information with other organisations

Schedule A lists the circumstances in which certain types of information may be shared with other organisations.

Information used in SWVG publicity and reports

If SWVG wants to include any personal information in publicity and reports that could be used to identify you then this will only be done if you consent.

Photographs

We sometimes take photos at SWVG events which can be used for our newsletter, website or social media. If you do not wish to be photographed, please let the organiser/photographer know at the event if possible, or contact us at privacy@swvg-refugees.org.uk to let us know.

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 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 contracted staff and 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.

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 the SWVG Administrator or to the SWVG Privacy Representative (privacy@swvg-refugees.org.uk).

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.

Schedule A: types of information, purposes, lawful basis

Information type	Purposes	Lawful basis	Circumstances for sharing
Volunteers / Trustees (and applicants)			
Applications to join SWVG	Process applications	Legitimate Interest	Contacting referees
DBS checks: level, Update Service status, certificate number, issue date and re-check date	Vetting applicants; prompting re-checks	Legitimate Interest	Communication with UK Government's Disclosure and Barring Service
Volunteers' bank details and records of expenses payments claimed and made	Financial accounting and efficient payment	Legal Obligation	Financial audit
List of volunteers with contact details	(i) Record of key information necessary to operate SWVG (ii) to enable volunteers to contact each other	Legitimate Interest	An individual name, phone number and/or email address shared with person using SWVG services and/or third party occasionally when needed to assist a person using SWVG services.
Internal emails (which may sometimes contain Special Category information)	To exchange information needed to operate SWVG. Special Category information on a need-to-know basis only.	Legitimate Interest (Special Category information also requires explicit consent)	When needed for SWVG activities.
List of volunteers in each SWVG visitor support group	Enable administration of SWVG visitor support groups	Legitimate Interest	When needed for SWVG activities.
List of trustees, their application forms, declarations of interest, etc.	Enable administration of trustees and comply with charity law	Legal Obligation	Legal obligations
Contracted Staff (and applicants)			
Contracts, references, application forms, and other records relating to the position	Compliance with law and good practice	Legitimate Interests (applicants) Contract (staff)	Legal obligations

Information type	Purposes	Lawful basis	Circumstances for sharing
Payment records and bank details	Financial accounting and efficient payment	Legal Obligation	Legal obligations
People who attended an event (for each event)			
List of attendees	SWVG records	Consent	When needed for SWVG activities.
Donors (individuals as well as organisations)			
List of donors, contact details, donation details and other relevant information	SWVG fund raising and financial accounting	Legal Obligation	Financial audit
Friends			
List of Friends; Newsletter mailing list	To communicate with Friends of SWVG	Consent	When needed for SWVG activities.
Photos			
Volunteers and staff; also sometimes speakers at events, people involved in campaigning activities	For use in SWVG newsletters, website or other publications.	Consent	Publicity and reporting
Third Parties			
People in organisations with which SWVG co-ordinates support activities or has contracts with including suppliers e.g. of stationery; printers	In order to manage our contract requirements.	Legitimate Interests	Financial audit
People who speak at events	Contact details and introductory personal information and notes relating to the event.	Consent	Publicity and reporting
Officials with whom SWVG has communications e.g. at Home Office, doctors, solicitors.	Contact details and notes relating to the communications.	Legitimate Interests	When needed for SWVG activities.