



# Kent Refugee Action Network

## Privacy Notice

### Version Control

Version	1
Date Created	09.05.24
Approved by	Board of Trustees
Approved Date	29.05.24
Review frequency	Annual
Next review date	May 2025

## Statement of Intent and sign-off

KRAN's Privacy Notice sets out what we do with personal data we collect in compliance with data protection laws.

The policy applies to all:

- Employees
- Trustees
- Volunteers
- Sessional staff
- Third parties who may have access to any personal data


It relates to all areas of business including (but not limited to):

- Finance
- HR
- Learning for Life
- Advocacy & Support


It relates to our provision of services for refugees and asylum seekers.

Employees, trustees, volunteers, sessional staff and third parties are required to comply with the policy in all circumstances.

This Privacy Notice should be consulted in conjunction with our Data Protection Policy (GDPR) Including Data Retention policy.

Signed:  Date: 25/07/24

Chair of the Board of Trustees

Signed:  Date: 25/7/24

CEO

This privacy notice tells you what to expect us to do with your personal information when you work for us.

## **Our contact details**

Address: **Unit 1, 34 Simmonds Road, CANTERBURY, Kent, CT1 3RA, GB**

Telephone: **01227634320**

Email: **louise@kran.org.uk**

## **What information we collect and use, and why**

### **1. Staff recruitment, administration and management**

We collect or use the following personal information as part of **staff recruitment, administration and management**:

- Contact details (eg name, address, telephone number or personal email address)
- Date of birth
- National Insurance number
- Gender
- Photographs (eg staff ID card)
- Copies of passports or other photo ID
- Copies of proof of address documents (eg bank statements or bills)
- Marital status
- Next of kin or emergency contact details
- Employment history (eg job application, employment references or secondary employment)
- Education history (eg qualifications)
- Right to work information
- Details of any criminal convictions (eg DBS checks)
- Political, conflict of interest or gift declarations
- Performance records (eg reviews, disciplinary records, complaints or disciplinary action)
- Training history and development needs

We also collect the following information for **staff recruitment, administration and management**:

- Racial or ethnic origin
- Health information

Our lawful bases for collecting or using personal information as part of **staff recruitment, administration and management** are:

- Consent
- Contract
- Legal obligation
- Legitimate interest:

## **2. Salaries and pensions**

We collect or use the following personal information as part of **managing salaries and pensions**:

- Job role and employment contract (eg start and leave dates, salary, changes to employment contract or working patterns)
- Time spent working (eg timesheets or clocking in and out)
- Expense, overtime or other payments claimed
- Leave (eg sick leave, holidays or special leave)
- Maternity, paternity, shared parental and adoption leave and pay
- Pension details
- Bank account details
- Payroll records
- Tax status

Our lawful bases for collecting or using personal information as part of **managing salaries and pensions** are:

- Consent
- Contract
- Legal obligation
- Legitimate interest:

## **3. Staff health and wellbeing**

We collect or use the following personal information for **managing staff health and wellbeing**:

- General health and wellbeing information
- Occupational health referrals and reports
- Sick leave forms or fit notes (eg Statement of Fitness for Work from a GP or hospital)
- Accident at work records
- Access needs or reasonable adjustments
- Protected Characteristics (as defined by the Equality Act and s.75 of the Northern Ireland Act for the purpose of equal opportunities monitoring)

We also collect the following information for **managing staff health and wellbeing**:

- Health information

Our lawful bases for collecting or using personal information as part of **managing staff health and wellbeing** are:

- Consent
- Contract
- Legal obligation
- Legitimate interest:
- Vital interests

## **Where we get personal information from**

We collect your information from the following places:

- From staff members or volunteers directly
- Schools, colleges, universities or other education organisations
- Referees (external or internal)
- Security clearance providers
- Occupational Health and other health providers
- Pension administrators or government departments (eg HMRC and DWP)

## **How long we keep information**

For more information about how long we keep your information, take a look at our retention schedule within our Data Protection Policy.

## **Who we share information with**

In some circumstances, we may share information with the following organisations:

- HMRC
- Employee benefit schemes

## Data processors

We log our data processes and processors within our GDPR documentation controller log.

Where necessary, our data processor(s) may transfer information outside of the UK. When doing so, we comply with the UK GDPR, making sure appropriate safeguards are in place. Please contact us for more information.

## Your data protection rights

Under data protection law, you have rights including:

**Your right of access** - You have the right to ask us for copies of your personal data.

**Your right to rectification** - You have the right to ask us to rectify personal data you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

**Your right to erasure** - You have the right to ask us to erase your personal data in certain circumstances.

**Your right to restriction of processing** - You have the right to ask us to restrict the processing of your personal data in certain circumstances.

**Your right to object to processing** - You have the right to object to the processing of your personal data in certain circumstances.

**Your right to data portability** - You have the right to ask that we transfer the personal data you gave us to another organisation, or to you, in certain circumstances.

**Your right to withdraw consent** – When we use consent as our lawful basis you have the right to withdraw your consent.

You don't usually need to pay a fee to exercise your rights. If you make a request, we have one calendar month to respond to you.

To make a data protection rights request, please contact us using the contact details at the top of this privacy notice.

## How to complain

If you have any concerns about our use of your personal data, you can make a complaint to us using the contact details at the top of this privacy notice.

If you remain unhappy with how we've used your data after raising a complaint with us, you can also complain to the ICO.

The ICO's address:

Information Commissioner's Office  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Helpline number: 0303 123 1113

Website: <https://www.ico.org.uk/make-a-complaint>