

Data Protection Policy

Privacy Notice and Cookies Policy

July 2021



**FARDAD
FOUNDATION**



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Privacy Notice and Cookies Policy

Introduction

At Migrant Leaders, we are committed to protecting and using your personal data in a fair and transparent manner and in accordance with all applicable regulations and laws. We are classed as the “Data Controller” for all the data we collect as we determine how and why this data is collected and used.

The following Privacy Notice and Cookies Policy (Policy) describe the types of data we collect and how Migrant Leaders collects, retains and uses the information as well as detailing your rights as the data subject.

All following references to “we” and “us” refer to Migrant Leaders, a charity registered with the Charity Commission in England and Wales under registration number 1176049.

This Policy is set out as follows:

1. Who we are and our contact details
2. Type of data we collect - overview
3. The personal data details we collect and why we collect them
4. Special Category Data
5. How we collect data
6. How we store your data
7. Our lawful basis for using your data
8. Third Party Processors
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10. Your data protection rights
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12. Cookies Policy



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1. Who we are and our contact details

Migrant Leaders is a charity that works directly with young migrants and others from deprived neighbourhoods, educational institutions and employers to provide bespoke support pathways towards the fulfilment of our beneficiaries' true potential. We develop and deliver programmes working with third parties and volunteers. For further details please see the Programme page on our website.

As a summary, we collect personal data so that we can provide services to our beneficiaries. The legal basis for the processing of personal data is:

- your explicit legal consent
- for the purposes of pursuing our legitimate interests; and
- to meet our obligations in relation to the use of volunteers and social protection.

Please read this Privacy Notice and Cookies Policy in full.

You may withdraw your consent or ask us to remove your profile and/or delete any personal data at any time by emailing compliance@migrantleaders.org.uk (see Section 11 of this Policy for more information). Please be aware that:

- we may need to contact you for additional information before we do that; and
- we may not be able to provide you with our full range of services without a full set of information.

Contact Details

Registered address: Chenies House, Woodbank, Rickmansworth WD3 4GZ

If you have any data protection questions and/or complaints in any way connected with this Policy, please do not hesitate to contact us by email on: compliance@migrantleaders.org.uk.



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You may also contact the CEO of Migrant Leaders directly, as our nominated representative for all data processing related queries:

Efardad@migrantleaders.org.uk.

Please refer to the complaint section at the end of this Policy for further details on your rights as the data subject and/or should you have any concerns and/or wish to make a complaint.

2. Type of data we collect - overview

We collect your personal data to enable us to consider you as a beneficiary or volunteer for Migrant Leaders (for instance, as part of your registration to access the Migrant Leaders Digital Zone on our website and when you subscribe to our newsletters). Personal data includes sensitive personal data which, under the law, is considered Special Category Data (SCD) that requires additional safeguarding. Please see Section 4 for further details about this.

The law requires Migrant Leaders to identify a lawful basis for collecting your data. We meet such criteria when you give explicit consent to process personal data and to pursue our legitimate interests. This collection of such data is fundamental for Migrant Leaders to demonstrate the eligibility of our beneficiary pool, in aggregate terms, and is in line with our core objectives as a charity and our purpose of supporting young people to fulfil their potential. We also meet such criteria because we have duties as a provider of a regulated activity under Safeguarding requirements (for instance, we will ask for DBS checks/certificates where required but will obtain your consent prior to submitting an application for a DBS check).



3. *The personal data details we collect and why we collect them*

The types of personal data that we collect are summarised below with a detailed explanation of why we collect those specific categories. We have limited the data we collect to what is strictly required for us to provide the services we offer and to check eligibility for our programmes.

- Beneficiaries
- Name, Contact Details and Date of Birth

We collect a candidate's name, date of birth and contact details (such as email and mobile phone number) so we are able to contact you about your application, the Migrant Leaders Development Programme, our events, any opportunities from our corporate partners and to connect you to matched mentors.

We will share your name and contact details with your allocated mentor so that they can contact you to provide you with mentoring.

This personal data may also be used by Migrant Leaders' staff, and research companies Migrant Leaders engages, for the additional purposes of:

- updating you with news and developments in our services
 - checking that our services meet user needs
 - reporting on the effectiveness and impact of our services
 - to ask you to take part in research
- **School/ College/ University currently attended & Year Group**
We ask for the name of your current and former places of study and your year of study to determine eligibility for our programme. This information also allows us to determine which events to invite you to. Further, where Migrant Leaders has established a working relationship with named members of staff at your school or other places of study, we will periodically enter correspondence with them and provide them with updates on the progress of your application.



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- **Hometown and Postcode**

Applications for the Migrant Leaders Development Programme will only be considered from residents of the United Kingdom. We will therefore collect your hometown and postcode details as this data allows us to determine eligibility for our programme and to analyse and report on the locations of our beneficiaries.

- **Career Information**

Migrant Leaders will collect information about your career aspirations, current education and career level, extra-curricular experience as well as sector interests.

Your personal reasons for applying and future aspiration statements are to allow you to highlight your expectations, key interests, skills and ambitions to inform us when we consider potential mentoring match/es. This will be supplemented if you are selected for interview by relevant information you give us during the interview process. This may be recorded in interview notes and in our database.

- **How you heard about us**

We may ask you how you found out about Migrant Leaders. We will use the information you provide to inform and analyse the effectiveness of our marketing and campaigning activities.

- **Volunteers**

Mentors, talent ambassadors, corporate ambassadors and other volunteers will be asked for their name, contact details (such as email address/es), job title, employer and/or company details and publicly available Linked In profile URL. This enables us to communicate with you and match mentors with potential mentees.

Volunteer mentors will primarily be UK residents, a minority may be volunteering from overseas and where this is the case the country will be used to determine the correct method of criminal record checks is applied. The Home Office Guidance on Criminal Records Checks and the police guidance on International Child Protection Certificate will be consulted for any overseas volunteers. See further information regarding DBS checks below.



- **Miscellaneous enquiry**

A copy of any written enquiry, e.g. email, or a summary description of the nature of a verbal enquiry, will be kept so that we can tailor responses accordingly and keep a record of enquiries and responses given.

- **Registration for events**

Your name and contact details are required for registration purposes at events you choose to attend and for other opportunities that require a name by us, or any of our corporate partners (involved in the events to which you have signed up), so that we can contact you about them.

Please note that for any person who has registered, secured a ticket or been given a complimentary ticket and/or has attended one of our events, we will record who attended, the event and the date and time of attendance. This is so that we can seek feedback, report on numbers attending and produce analysis for future marketing as required.

Where food is provided at our events, we will ask you to supply information regarding special dietary requirements so that we can ensure all needs and restrictions are met.

For further information about how we engage with third party event hosting, registration and/or ticketing websites, please refer to Section 8 – Third Party Processors.

4. Special Category Data

Special Category Data (SCD) may be requested through our Candidate Application Form, the Equality Monitoring Form on our website and the mentor application process, It may also be requested via interview or correspondence. The law requires explicit consent from you to collect SCD data and by completing our forms or responding to verbal/written requests, you give us explicit consent to process SCD, and to share anonymised and aggregate statistics through our website and/or via regular reports on our performance to our supporters and other stakeholders.



Please note only anonymised and aggregated statistics will be shared with our supporters and other stakeholders and your SCD will only be accessible to Migrant Leaders and/or as highlighted under Section 8 - Third Party Processors, unless explicit written consent to share has otherwise been received from you. For further detail on our processing of SCD please see below.

• **Diversity Data**

Migrant Leaders will ask you, as an applicant for the Migrant Leaders Development Programme, to tick one or more applicable category on the Equality Monitoring form (as set out below) to verify that you classify as an eligible candidate in accordance with our charitable objectives. We collect this and other diversity data to be able to report on our impact and effectiveness. You do not have to provide this information and can indicate this on the form.

Eligibility Categories:

- First or Second-Generation Migrant
- Age (16-25 years)
- State School/ Educational Institutions
- Other under-represented or disadvantaged groups such as Socioeconomic Disadvantage or BAME

Other diversity data categories:

- Gender
- Religion/Belief
- Marital Status
- Country/Region
- Ethnicity
- Caring Responsibilities
- Disability
- Free Meals Status
- Sexual Orientation
- Household Income



As highlighted above, this will be used on an anonymised and aggregate basis in the form of statistics to report the eligibility of and impact on our beneficiaries. Individual data will only be accessible to the Migrant Leaders Executive Team and as highlighted under Third Party Processors (Section 8), unless explicit written consent to share it has been received from you.

- **DBS Information**

Mentors, other volunteers and staff/workers may be asked about their latest Disclosure and Barring Service (DBS) check. If this is the case, you will be asked for a copy of your most recent DBS Certificate or will be asked to provide information and consent to enable Migrant Leaders to create an application, via a government authorised umbrella body, for a new check at the required, level e.g. an enhanced DBS check with a children's barred list check, where appropriate. We are required to collect information about DBS checks because mentoring young people of 16-18 years of age is a regulated activity under safeguarding legislation.

Please see our other policies on the requesting and handling DBS certificate information.

5. How we collect data

Further to sections 3 and 4 above, we collect data in multiple ways, including but not limited to:

- Data capture forms hosted on our website for programmes and events.
- Through logged user activity and via cookies on our website (please refer to our Cookie Policy below for more information).
- Through your interaction with any of our marketing campaigns.
- Through communications with us, including interviews, and correspondence with you.



Much of the personal information we process is provided to us directly when you complete any of the forms on our website, e.g. Candidate Application Form, Equality Monitoring Form. We could also receive personal information indirectly, from the following sources and scenarios:

- referrals from beneficiaries, volunteers and organisation partners
- recommendations from our professional networks
- referrals from student networks, university networks, diversity networks, charity organisations, other diversity organisations

We note that the way in which the above third parties process or have processed your personal data will be covered in their privacy policies.

6. How we store your data

The information we collect will be stored electronically and only accessible to Migrant Leaders and third-party data processors as outlined in this Policy (section 8). Personal information will not be shared unless explicit consent is received from you or as outlined in the explanations for collecting each data type above. Handwritten interview notes will be held in paper files for reference to assist us with matching mentees and mentors.

We keep all the information you have provided to Migrant Leaders for 7 years so that we have your data for as long as possible while you are within our eligible age group or over 25 years old and still a beneficiary. If there has been no meaningful contact in this timeframe, we will dispose of your personal data by removing it from our database and files.

Before we remove your data we may contact you to ask for your permission and to give you the option to allow us to keep your data stored. We will let you know how long and for what purpose we intend to keep your data.



7. Our lawful basis for using your data

To process your data, we are required to establish a clear lawful basis for doing so. For more information on the lawful bases on which personal data may be processed please visit the Information Commissioner's website. The lawful bases we use to process your data include:

- **Consent**

Your freely given, specific and informed consent to process your data. You have the right to withdraw your consent at any time as highlighted in this Policy (see section 11 below).

- **Legitimate interest**

Where the processing of personal data is necessary for our legitimate charitable interests, we may undertake such activities. However, it should not outbalance your interests, rights and freedoms. These activities should be in line with your expectations and you have the right to object to this processing at any time by contacting us at compliance@migrantleaders.org.uk.

- **Exercising our obligations**

Where the processing of data is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or data subject in connection with employment (including voluntary work), social security or social protection and we have appropriate policy documents in place. Please see above regarding the requesting and handling DBS certificate information.



8. Third party processors

We may have to share your personal data with our third party data processors (subcontractors) to provide our services or they may collect personal data directly from you on our behalf. We require all third parties to respect the security of your personal data and to treat it in accordance with this Policy, applicable law, and we only permit them to process your personal data for specified purposes and in accordance with our instructions.

- **Use of personal data for Migrant Leaders' research purposes**

We may share personal data with third parties who we engage to undertake research and analysis for us.

- **Website hosting**

Kajabi is our data processor as website host– please use the following link for further information: <https://kajabi.com/policies/privacy>).

- **Customer relationship management**

Salesforce is our data processor as our customer relationship management platform (a system that enables us to record and manage our data and communications efficiently) – please use the following link for further information: <https://www.salesforce.com/privacy/overview/>.

- **Third party event hosting, registration and/or ticketing websites**

We may use third party event hosting, registration and/or ticketing websites to assist in hosting our events.

Eventbrite is an event registration and ticketing platform that we often use - please use the following link for further information:

https://www.eventbrite.co.uk/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_GB.



9. Changes

We are constantly working on improving and developing our services and website, so we may review and update this Policy from time to time. We will only do this in compliance with applicable law, and if the changes are significant, we will provide a more prominent notice when we are required to do so by applicable law. We do encourage you to review this Policy from time to time to stay updated on any changes.

10. Your data protection rights

Under data protection law, you have the following rights:

- **Your right of access-** You have the right to ask us for copies of your personal information, also known as a Subject Access Request.
- **Your right to rectification-** You have the right to ask us to rectify information 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 information in certain circumstances.
- **Your right to restriction of processing-** You have the right to ask us to restrict the processing of your information 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 information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make such a request, we have one month to respond to you.



11. How to exercise your data protection rights, withdraw consent or complain

Please contact us at compliance@migrantleaders.org.uk if you wish to make a Subject Access Request or exercise your other data protection rights, make a complaint and/or have any questions regarding the above.

You can also complain directly to the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data or responded to your request/query. You can do this via www.ico.org.uk, in writing or by telephoning the ICO, please see the address and helpline number below:

Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow, Cheshire
SK9 5AF
Helpline number: 0303 123 1113

12. Cookies Policy

The Migrant Leaders website may use cookies for a variety of reasons. These include enabling users to log in to their account and differentiating new and returning users for the purposes of site traffic analytics. In addition, our website may deliver third party cookies via third party applications such as social media sharing buttons which falls outside the remit of our control. If you have any concerns please do contact us at compliance@migrantleaders.org.uk.



Cookies are pieces of information that a website transfers to an individual's computer hard drive for record keeping purposes. Cookies make using our website easier by, among other things, saving your passwords and preferences for you. These cookies are restricted for use only on our website, and do not transfer any personal information to any other party. Most browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or indicate when a cookie is being sent. Please consult the technical information relevant to your browser for instructions. If you choose to disable your cookies setting or refuse to accept a cookie, some parts of the website may not function properly or may be considerably slower.

Kajabi uses the following cookies on the website:

Cookie Name	Purpose
<code>_kjb_session</code> Kajabi session cookie	Tracks your active admin session so you don't need to re-login
<code>kjba</code> Kajabi affiliate token	Tracks which affiliate has referred an offer purchase
<code>_abv</code> Admin bar hidden	Tracks whether the user wishes their admin previewing bar to be hidden

Malware/Spyware/Viruses: Neither Migrant Leaders nor the website knowingly permit the use of malware, spyware, viruses, and/or other similar types of software.

Links to External Sites: Migrant Leaders is not responsible for the content or practices of third party websites that may be linked to the website. Migrant Leaders is also not responsible for any information that you might share with such linked websites. You should refer to each website's respective privacy policy and practices prior to disclosing any information.



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-  [instagram.com/migrantleaders_](https://www.instagram.com/migrantleaders_)



FARDAD FOUNDATION

The Fardad Foundation (TFF) is a UK registered charity that works directly with young people from deprived neighbourhoods, educational institutions and employers to provide bespoke support pathways towards the fulfilment of their true potential. TFF develops and delivers programmes, working with third parties and volunteers. Incorporated independently, TFF is governed by a diverse Trustees Board.

The Fardad Foundation (TFF) is registered as a charity with the Charity Commission in England and Wales with registered charity number 1176049.