



Phone Credit for Refugees

Data Protection Policy

Part One: Our Commitment to Data Protection

Introduction

In order to operate efficiently, Phone Credit for Refugees (PC4R) has to collect and use personal data about people with whom it works. As a charity working with refugees and displaced people across the world, our service users are some of the most vulnerable people within our society. It is therefore crucial that our practices reflect the best interest of our service users and do not negatively impact on their dignity and respect. It is fundamental that we carefully safeguard personal details such as refugees' phone numbers and locations to avoid placing them at any additional risk by using our service.

We are also aware that our donators provide donations for a specific purpose and it is our duty to ensure that we carry out adequate checks to confirm the authenticity of any requests for phone credit. This provides legitimacy in our fundraising operations and provides our donors with assurances that their donations are reaching those in need.

We will endeavour to ensure that all applicants understand the purpose and intended use of any information we request from them. Applicants may request a copy of the information we keep about them.

We are committed to good practice and we are fully committed to compliance with the requirements of the Data Protection Act 1998 and 2003 (DPA) and the International Standards on Records Management.

What is personal data?

Personal data is defined by the DPA as data relating to a living individual who can be identified from that data alone, or that data in addition to other information that may come into possession of the data controller (in this case, Phone Credit for Refugees).

The DPA categorises certain information as sensitive personal information if it contains race, ethnicity, religious beliefs, physical or mental health, sexual orientation, and criminal records. At present, we do not keep records of this nature.

This policy covers information that is stored electronically, in addition to any information that may be held in manual or physical records.

Policy aims

We aim to be non-intrusive in our requests for personal data, and will record the minimum level of information necessary to validate the authenticity and process a request for phone credit.

This policy aims to fulfil requirements for fair and lawful processing of personal data in the records that we create and receive in the course of our activities. It also sets out how we comply with the DPA.

Data Protection Principles

The DPA sets out 8 principles which underpin the handling of personal data. To ensure compliance with DPA, Phone Credit for Refugees commits to ensuring that personal information is:

1. Processed lawfully and fairly, and is not processed unless certain conditions are met
2. Obtained for specific and lawful processes
3. Adequate, relevant, and non-excessive
4. Kept no longer than necessary
5. Accurate and up to date
6. Processed in accordance with the data subjects' rights
7. Protected by appropriate technical and organisational security measures
8. Not transferred overseas without adequate protection

Data protection processes

To fulfil our obligations under DPA, Phone Credit for Refugees has processes and systems which:

- Observe fully conditions regarding the fair collection and use of personal data and specify the purposes for which the information is used.

- Collect and process appropriate personal information only to the extent it is needed to fulfil the charitable funds operational needs in compliance with the law.
- Ensure the records that we retain are only held for as long as deemed necessary
- Ensure that people we hold information about can exercise their legal right fully under the DPA
- Take appropriate technical and organisational security measures to safeguard information
- Ensure the information obtained on file is not sent abroad without suitable safeguards

This is achieved by:

- Training our volunteers on data handling and good practice;
- Maintaining retention schedules for all records held to ensure they are only held as long as necessary;
- The quick and efficient processing of subject access requests; and
- Regular review and audit of how information is collected and stored.

To comply with the above, volunteers agree to:

- Support new members of the team to comply with the charitable funds data collection policy;
- Familiarise themselves with this data protection policy;
- Ensure that the collection of personal data is compiled and stored securely; and
- Keep personal information secure and do not share with others outside the administration team.

Data Protection Officer

PCR will appoint a Data Protection Officer to monitor and oversee compliance with the Act; this policy; and any associated procedures. The Data Protection Officer will also act as a contact point and a source of additional information for staff.

The DPO is Samantha Lind.

Compliance with the Act and this policy remains the responsibility of individual volunteers, and not the Data Protection Officer.

Transfer outside the EU

Personal data must not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures that there is an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Part Two: How we collect and store information

The Phone Credit for Refugees Facebook Group

The PCR Facebook group serves two key purposes:

1. To facilitate requests from refugees for phone credit; and
2. To connect with donors and conduct fundraising activities.

As donors and refugees have the ability to directly interact in the Facebook group, the group is closed to the general public and anyone wishing to join is vetted by the administration team to ensure their authenticity. This provides safety and security to both refugees and donors and enables people to interact within a safe and inclusive forum.

- As a charitable fund we are aware sometimes people pass through the vetting process undetected. In this instance we reserve the right to remove any of our members who breach the terms of our data protection policy. Members will no longer have access to the group and will be prevented from The vetting process for donors and refugees is as follows:
- When joining the group as a donor, we will review the donor's Facebook profile to ensure that their profile includes no content that appears to be hostile to our cause. We check that their account is actively in use, as well as reviewing the content of any pages or groups that the user is affiliated with. This is a security measure to ensure that potential donors do not pose a risk to the refugees or are hostile to their plight.
- When joining the group as a refugee, it is our aim to ensure that the account is legitimate. If the Facebook account is less than three months old, the request will not be approved unless a member of the administration team is able to confirm that the request is legitimate. Requests will also be rejected if the refugee has previously been removed from the group for abusing the system or being verbally abusive to a

volunteer, donor, or another refugee or breaking one or more of the group rules included in the pinned group post. Profiles newer than 3 months old may be admitted to the group on the request of a trusted third party.

How we collect information

When a refugee makes a request in the Facebook group, it is not published on the group page. This provides a safety buffer to ensure that personal information is not provided within the social media platform. Instead, an Admin will review the request and add it to a pending queue that is held on the PC4R database. The pending post is then deleted from the group.

When a refugee makes a request to receive mobile credit, they are entering into a mutual agreement which asks them to provide information to determine authenticity and legitimacy of their claim for support from our charitable fund.

What information do we store?

In order to authenticate requests for phone credit, refugees are asked to provide the following information:

GPS location

We ask refugees to provide their GPS location to determine they are based in a country our charitable fund currently offers services. The location of our customers is not stored on file and is not shared outside of the administration team.

Hand picture (including pictures of residency)

We ask refugees to provide one or more pictures of their hand with their current residency behind it to ensure the authenticity of the person in real time. This is to help us determine that the person is real, has not made a double request, and is entitled to benefit from our service. Photographs are not held on file; however they may be used in fundraising appeals or advertising material with the refugee's written consent.

International Mobile Equipment Identity Number (IMEI)

Our customer agreement states that we provide each refugee with one top up every 30 days. An IMEI is a unique number which serves as a fingerprint for each individual mobile phone. We use this number to ensure that our customers do not make multiple claims

during a 30 day period. We record this number on our database so it is searchable for authenticity checks. This information is only accessible to our administration team.

Mobile phone number and network

We ask refugees to provide this information for the purposes of crediting their telephones. We store this information within our database so that it can be filtered and checked when necessary to prove legitimacy and to credit the number when funds are available.

Identification cards

To confirm the status and identity of the recipient, Admins will request proof of identity in the form of passport, residency permit, or applicant card. We do not store this information on file and this method is only used to ensure the integrity of our charitable fund

Facebook URL and name

For each request, we store the name of the refugee making the request, along with their Facebook URL. We record this number on our database so it is searchable for authenticity checks. This information is only accessible to our administration team.

How we store information

At present, the information we collect from refugees is stored in a secure Google Sheet. Access to this Google Sheet is protected, and must be authorized by James Pearce.

Once a volunteer resigns their post with Phone Credit for Refugees, access to the sheet will be revoked.

Rights to access of data

Under the rights of access as set out in section 7 of the DPA, a refugee is entitled to ask and be given access to the following information that we hold about them:

- A copy of the information in permanent form;
- An explanation of any technical or complicated terms;
- Any information about the source of the information; and
- The purpose for processing the information, and identification of anyone who the information might be shared with.