



This project is part funded by the EU Asylum, Migration and Integration Fund.
Making management of migration flows more efficient across the European Union.

Well-being and work for refugee integration Project Privacy Policy

The partners making up the ‘well-being and work for refugee integration’ project are committed to protecting and respecting your privacy.

This Policy explains when and why we collect personal data about people, how we use it and how we keep it secure.

We may change this Policy from time to time so please check this page occasionally to ensure that you’re happy with any changes. By using project partners’ websites, you’re agreeing to be bound by this Policy.

Any questions regarding this Policy and our privacy practices should be sent by email to louise.gooch@eelga.gov.uk or by writing to Louise at the Strategic Migration Partnership, West Suffolk House, Western Way, Bury St Edmunds, Suffolk IP33 3YU.

1. Who are we?

We are a partnership of organisations which have been working together since 1 April 2020 and will cease the working on this project when we have submitted our final reports in January 2023. We are working together to support the aims, objectives and targets of the AMIF funded project ‘well-being and work for refugee integration’.

2. How do we collect information from you?

We obtain information about you when you apply to use our services, for example, when you complete a skills and employment or well-being assessment or register for a service such as a specialist ESOL class.

We obtain information about you when you apply to for a job at one of the partners which are working on the project, through one of our websites, by email, by post or by phone.

3. Why do we collect and use information about you?

We will only use your personal data when the law allows us to:

- Where we need to perform the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.



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- We may also have to use your personal data in the following situations, which are likely to be rare:
 - Where we need to protect your interests (or someone else's interests).
 - Where it is needed in the public interest

The main purposes for which the ‘well-being and work for refugee integration’ project partners use your personal data are:

- To enable us to carry out the work of project as set out in the grant agreement with UKRA and in the collaboration agreement between lead and other partners.
- To respond appropriately to your contact with us.
- To provide the services detailed in the project application form, grant agreement and collaboration agreement to our beneficiaries - the people using the services provided by the project partners.
- To recruit new employees
- To send you communications which you have requested and that may be of interest to you; these may include information about employment opportunities and news about services.
- For legal and regulatory compliance purposes, for example, to ensure compliance with safeguarding, health and safety requirements and other legal obligations, or in connection with litigation, an internal investigation or audit, and to ensure compliance with laws, as well as equal opportunities monitoring;
- To maintain our own accounts and records;
- For our ‘legitimate business interest’, which means a reasonable use in line with the aims and activities of the project partners in relation to the project.

Should you choose to contact us using an email link, none of the data that you supply will be stored by our website.

4. What type of Personal Data is collected from you?

Personal data we collect can include information such as your name, communication preferences, email address, postal address, telephone number, mobile number, date of birth. The project partners undertaking skills assessments and therapeutic well-being assessments will also have to collect detailed personal information as required by the project funders, such as housing tenure, English level and biometric residence data. Full details are available on request.

If you contact us via the website, we may also collect and process information about your interactions with us, including IP address, and information regarding what pages are accessed and when.



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5. Special Categories of data

Under data protection law, certain special categories of personal data are recognised as sensitive, including information regarding race, religious beliefs, sexuality and health. We are not required to collect sensitive personal data and will only do so exceptionally, if there is a clear and legitimate reason for doing so.

Data relating to recruitment

The Project Partnership has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows partner organisations to manage the recruitment process, assess and confirm a candidate's suitability for the role and decide to whom to offer a job. Project Partners organisations may also need to process data from job applicants to respond to and defend against legal claims.

Project Partner organisations may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. This equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief is separated from the application form and used for monitoring purposes only.

It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a disability. All partners process such information to carry out their obligations and exercise specific rights in relation to employment.

6. Sharing your data with a third party

We do not share with, sell or rent the information you provide on our website to any third parties. EELGA SMP has one page on its website dedicated to the project. Our website uses the Google Analytics web analysis, to help us understand how people use the site. Cookies allow the web analytics service to recognise your browser or device and, for example, identify whether you have visited this website before, what you have viewed and clicked on and how you found the website. The information is anonymous and only used for statistical purposes, and it helps us to analyse patterns of user activity and to develop a better user experience. We analytics data and cookies cannot be used to identify you – they do not contain personal information such as your name or email address. Please follow this link to find Google's privacy policy: <http://www.google.com/policies/privacy/>. Please follow this link to find the SMP EELGA cookie policy: <http://www.eelga.gov.uk/cookie-policy.aspx>

We have to transfer service users' detailed personal information to the lead project partner, East of England LGA Strategic Migration Partnership who in turn share this with the project funders, the UK Responsible Authority (UKRA) and their evaluators, Ecorys, on behalf of the European Commission. We have a data sharing agreement in



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We have to share basic information about service users to a small number of organisations within the partnership for them to be able to contact service users to offer them a service. We have data sharing agreements in place between these partners to ensure the safe transfer and storage of data between partners.

Some of your personal data may be shared with another third party if we are under a duty to disclose or share your personal data in order to comply with any legal obligation or to enforce or apply our terms of use or to protect the rights, or safety of our employees and service users. However, we will take steps with the aim of ensuring that your privacy rights continue to be protected.

We may share your personal data if it is necessary for our legitimate interests and your interests and fundamental rights do not override those interests.

7. Retention of data

Under the terms of this project grant agreement, we are required to retain this data for 8 years.

8. Legislation compliance

Along with our business and internal computer systems, our project webpage is designed to comply with the following national and international legislation with regards to data protection and user privacy:

- UK Data Protection Act 1998 (DPA)
- EU General Data Protection Regulation 2018 (GDPR)
- The Privacy and Electronic Communications Regulations 2003

9. Additional information for Employees and Service Users

Relevant Privacy Information Notices are issued to Employees and to Service Users when required.

10. Additional information for website and service users

How can you change your contact details and preferences with us?

You will need to receive information from one or more partners to be able to use the services of this project. However, you have a choice as to how you receive information from us, and you should let us know if your preference changes by contacting your well-being or employment advice service.

The right to have inaccuracies corrected



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The accuracy of your information is important to us. If you change email address, telephone number or any of the other information we hold is inaccurate or out of date, please contact the well-being or employment advice service for it to be corrected.

The right to request a copy of personal data held about you

You have the right to ask for a copy of the information that the project partners hold about you. If you would like a copy of the information we hold on you, in the first instance please write to:

Louise Gooch, Strategic Migration Partnership,
East of England LGA, West Suffolk House,
Western Way, Bury St Edmunds
Suffolk IP33 3YU

You have the right to:

- request that we stop or restrict the processing your personal data, but in doing so, you will not be permitted to use any of the services funded by this project.
- The right to lodge a complaint with the Information Commissioner's Office or with the Lead Partner, East of England LGA SMP.

Security precautions in place to protect the loss, misuse or alteration of your information

We do not take sensitive data over the Internet. Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal data, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.

Once we receive your information whether over the Internet or by other means, we make our best effort to ensure its security on our systems in line with our Information and Data Sharing Policy.

Use of 'cookies'

- Like many other websites, some of the partner organisations' websites use cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual. This helps partners to improve their website and deliver a better, more personalised service.



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- It is possible to switch off cookies by setting your browser preferences. Turning cookies off may result in a loss of functionality when using partners' websites.

Links to other websites

Our website contains links to other project partners' websites. This privacy policy only applies to the activities which take place in relation to the project. We encourage you to read the privacy statements on the other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website.

In addition, if you linked to our website from a third party site, we cannot be responsible for the privacy policies and practices of the owners and operators of that third party site and recommend that you check the policy of that third party site.

16 or Under

We are concerned to protect the privacy of children aged 16 or under. If you are aged 16 or under, please get your parent/guardian's permission beforehand whenever you provide us with personal data.

Review of this Policy

We keep this Policy under regular review. This Policy was created in April 2020.