



Asylum Welcome – Privacy Notice for Clients

Effective date: September 2025

Asylum Welcome is an Oxford-based charity supporting asylum seekers, refugees, and vulnerable migrants across Oxfordshire. We promise to respect any personal data you share with us—or that we receive from other organisations—and keep it safe. We operate within the frameworks of UK General Data Protection (UK GDPR) and the Data Protection Act 2018, and where applicable, the Immigration Advice Authority (IAA) formerly known as OISC.

1. Who we are

Asylum Welcome is a registered charity providing advice, advocacy, and practical support to asylum seekers, refugees, and vulnerable migrants. Protecting your privacy is central to our values.

2. Our Governing Principles

In line with our Data Protection & IT Security Policy, we will ensure that personal data is :

- Processed lawfully, fairly and transparently – we are clear with you about how we use your data.
- Collected for specified, explicit and legitimate purposes – we only collect what we need to deliver our services.
- Adequate, relevant and limited to what is necessary – we do not collect more information than we need.
- Accurate and, where necessary, kept up to date – we take steps to ensure records are correct.
- Kept no longer than necessary – we apply retention periods appropriate to the service provided.
- Processed securely – we protect your data with appropriate technical and organisational measures.

3. Categories of Information We Collect:

To provide you with appropriate advice and support, and to meet our legal and safeguarding duties, Asylum Welcome may collect and process the following categories of personal information:

3.1 Basic identity details

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Unit 7, Newtec Place • Magdalen Road • Oxford OX4 1RE

Tel: 01865 722082 • www.asylum-welcome.org • IAA

reference: N201400465 • Registered charity no. 1092265 •

Company no 4361627



- Name, title, date of birth, age, and gender.
- Sex assigned at birth and preferred gender identity.
- Photographs where required for identification.

3.2 Contact information

- Home address, email address, telephone numbers.
- Emergency contact details.

3.3 Demographic and personal characteristics

- Ethnicity and nationality.
- Religion or belief.
- Language(s) spoken and literacy levels.
- Sexual orientation.
- Relationship and family status, including whether you are a carer or have caring responsibilities.

3.4 Immigration and legal information

- Immigration status, asylum claim details, and Home Office reference numbers.
- E-Visa details.
- Information relevant to applications, appeals, or casework we support.

3.5 Health and wellbeing information (special category data)

- Physical and mental health information where relevant to your support needs.
- Disabilities and long-term conditions.
- Support needs linked to trauma, safety, or wellbeing.

3.6 Education, training, and employment

- Qualifications, training, and skills.
- Employment history and work aspirations.
- Current education or training participation.

3.7 Housing and financial circumstances

- Housing situation, including type of accommodation.
- Financial information, including income, benefits, and allowances.

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- Details of hardship support provided (e.g. food, devices, Equal Cards, or bicycles).

3.8 Service use records

- Case notes and correspondence.
- Records of advice and support given.
- Referrals to or from other organisations.
- Safeguarding concerns or risk factors identified.

3.9 Special category and sensitive information

- Information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health data, or sexual orientation will only be processed when strictly necessary, with appropriate safeguards, and in line with UK GDPR.

4. How We Use Your Data:

Asylum Welcome will only use your personal information for purposes that are necessary, proportionate, and clearly explained. These include:

4.1 Providing services

- Delivering advice, advocacy, and support tailored to your needs.
- Recording the services provided to you, including case notes and outcomes.
- Referring you to trusted partner organisations (for example, solicitors, healthcare providers, housing officers, or education services), with your consent.

4.2 Meeting legal and safeguarding responsibilities

- Acting on safeguarding concerns relating to children, young people, or adults at risk.
- Complying with statutory and contractual duties.
- Cooperating with regulators, such as the Office of the Immigration Services Commissioner (OISC), where required.

4.3 Monitoring and improving our services

- Reviewing case records to ensure quality and consistency of support.
- Gathering anonymised or aggregated information for monitoring and evaluation.
- Reporting anonymised data to funders, commissioners, and partners to

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evidence our work.

4.4 Immigration advice

- Where we provide immigration advice, your personal information will be collected, used, and stored in line with the Immigration Advice Authority (IAA) Guidelines and code of conduct.
- Immigration case files are subject to additional protections and will be retained for six years after our last contact with you.

4.5 Internal administration

- Managing appointments, records, and communications.
- Responding to requests or complaints.
- Ensuring compliance with our Data Protection & IT Security Policy.

We will never use your data for purposes that you have not been informed about, unless there are safeguarding reasons which may affect your safety or others.

5. Lawful Bases for Processing:

Under the UK GDPR, Asylum Welcome must identify a lawful basis for processing personal data. We rely on the following:

5.1 Consent

- When you have given clear and informed permission for us to process your personal information for a specific purpose.
- Example: referring you to another organisation, such as a solicitor or healthcare provider.
- You have the right to withdraw your consent at any time.

5.2 Legitimate interests

- When it is necessary for us to process your information in order to provide you with support and improve our services, and your rights and freedoms are not overridden.
- Example: keeping case notes to ensure continuity of advice.

5.3 Legal obligations

- When we are required by law to process or share information.
- Example: safeguarding concerns, or responding to lawful requests from regulators.

5.4 Contractual necessity

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- When processing is required in order to meet obligations under a contract or funding agreement.
- Example: providing anonymised monitoring data to commissioners.

5.5 Special category data

When processing sensitive information (such as health data, ethnicity, or religious belief), we rely on the following additional conditions under UK GDPR:

- Explicit consent.
- Substantial public interest, where processing is necessary for safeguarding, equality monitoring, or preventing fraud.
- Legal claims, where information is required to establish, exercise, or defend legal rights.

5.6 Immigration advice

- When providing immigration advice, we process your data in compliance with the Immigration Advice Authority IAA regulations formerly known as OISC.
- This ensures that records are held and protected to the required regulatory standard.

6. Who We Might Share Your Information With:

Asylum Welcome will only share your personal information where it is lawful and necessary to do so. We will always explain why and with whom your information is being shared, unless we are legally prevented from doing so.

We may share information with:

6.1 Trusted partner organisations

- Other charities, community groups, or service providers who are directly involved in supporting you (for example, solicitors, healthcare professionals, housing officers, or education services).
- We will only do this with your knowledge and, where required, your consent.

6.2 Funders and commissioners

- Information may be shared in anonymised or aggregated form to demonstrate the impact of our services.
- We will not share personal information with funders unless explicitly required by the funding agreement and you have been informed.

6.3 Statutory bodies and regulators

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- Local authorities, safeguarding boards, or regulatory bodies, where we are required to comply with the law.
- The Office of the Immigration Services Commissioner (OISC), where necessary for immigration casework compliance.

6.4 Safeguarding situations

- Where we believe there is a risk of significant harm to you or others, we may share relevant information with statutory agencies, even without your consent, if the law requires us to do so.

6.5 Immigration enforcement

- We do not share your data with immigration enforcement agencies unless we are legally compelled to do so.

7. Storage & Security:

Asylum Welcome takes the security of your personal information seriously. We apply appropriate technical and organisational measures to protect your data from unauthorised access, alteration, disclosure, or loss.

7.1 Digital records

- Personal data is stored in secure, encrypted databases and systems.
- Access is restricted to authorised staff and volunteers who require it to carry out their roles.
- Access is controlled through strong passwords, role-based permissions, and, where possible, multi-factor authentication.

7.2 Paper records

- If paper files are used, they are kept in locked storage within secure premises.
- Paper records are only accessed by staff and volunteers who need them for their work.
- Records are securely shredded or destroyed once they are no longer required.

7.3 IT systems

- Our IT systems are regularly updated and protected with appropriate security software.
- Staff and volunteers receive regular training on information security and data protection.

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- Breach detection, reporting, and response procedures are in place, as set out in our Data Protection & IT Security Policy.

7.4 Transfers outside the UK

- We do not routinely transfer your data outside the UK. If we ever needed to, we would ensure appropriate safeguards are in place, in line with UK data protection law.

8. Data Retention Periods:

Asylum Welcome will not keep your personal data for longer than necessary. Retention periods are determined by the nature of the service provided, legal and regulatory requirements, and safeguarding considerations.

8.1 General client records

- Records relating to advice, casework, and support services are normally retained for **six years** after our last contact with you.
- After this period, records are securely deleted or destroyed.

8.2 Immigration advice records

- Where we provide immigration advice, case files are retained for **six years**, in line with the requirements of the Immigration Advice authority (IAA) formerly known as Office of the Immigration Services Commissioner (OISC).
- Immigration records may not be deleted before this period has passed, even if requested, unless there is a lawful basis to do so.

8.3 Safeguarding records

- Records relating to safeguarding may be retained for longer where required by law, regulation, or best practice guidance.

8.4 Exceptions

- In some circumstances, records may need to be kept for longer than six years, for example if there are ongoing legal proceedings or regulatory investigations.
- Where this applies, you will be informed where possible.

9. Your Rights:

Under the UK GDPR and the Data Protection Act 2018, you have the following rights in relation to the personal information we hold about you:

9.1 Right to be informed

You have the right to clear and transparent information about how we collect and use your personal data. This Privacy Notice forms part of that right.

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9.2 Right of access

You have the right to request a copy of the personal data we hold about you. We will respond to Subject Access Requests within one month, in line with our Data Protection & IT Security Policy.

9.3 Right to rectification

You can ask us to correct inaccurate or incomplete information we hold about you.

9.4 Right to erasure and how we handle deletion requests

You have the right to request the deletion of your personal data in certain circumstances. Asylum Welcome will always consider such requests carefully and transparently. However, this right is not absolute, and we may be unable to delete some or all of your information where there is a lawful or safeguarding reason to retain it. We may not be able to delete your data where:

- We have a legal obligation to retain information, including immigration-related enquiries or casework, which must be kept for six years in line with the Immigration Advice Authority (IAA) requirements.
- Safeguarding duties require us to retain information to protect you, other clients, staff, or volunteers. Safeguarding records may need to be kept beyond six years where legally or professionally required.
- The information is needed for public interest, regulatory compliance, or to establish, exercise, or defend legal claims.
- Deleting part of the record would compromise safeguarding or regulatory context, for example where general casework, risk-related information, and immigration notes are interlinked.

Where full deletion is not possible, we will take the following steps:

- Hide or restrict access to your record, ensuring it is not visible to staff or volunteers providing frontline support. Access will be limited to safeguarding or senior staff who are legally required to manage risk.
- Delete any information that is not legally or operationally required, such as duplicated entries or routine administrative notes.
- Restrict all further processing, ensuring your data is not used, shared, or updated unless legally required. Your record will be closed and inactive.
- Permanently delete your remaining information once the legal retention period has passed, unless there is a lawful reason to retain safeguarding material for longer.

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We will always explain to you what can be deleted, what must be kept, and why. Our aim is to respect your preferences while fulfilling our legal and safeguarding responsibilities.

9.5 Right to restrict processing

You can request that we limit how we use your data in certain circumstances.

9.6 Right to object

You can object to the processing of your personal data where lawful grounds allow.

9.7 Right to withdraw consent

Where we rely on your consent, you may withdraw it at any time.

9.8 Right to data portability

You can request to receive your personal data in a structured, commonly used, and machine-readable format, and to transfer it to another organisation where technically feasible.

9.9 Right to complain

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you are unhappy with how we use your data.

10. Breach Management:

Asylum Welcome takes all personal data breaches seriously. A personal data breach is any incident that leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.

10.1 Recording breaches

All breaches are logged in our Data Breach Log and investigated.

10.2 Reporting to the ICO

Where required, we will notify the Information Commissioner's Office (ICO) within 72 hours of becoming aware of a breach.

10.3 Informing individuals

If a breach poses a high risk to your rights and freedoms, we will inform you without undue delay.

10.4 Investigation and remediation

We will investigate all breaches to identify causes and implement measures to prevent recurrence.

11. How to Contact Us:

If you have any questions about how we handle your data, including requests to access a copy of the data we hold for you or to request we correct or delete data, please contact us at:

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Data Protection Lead

Asylum Welcome

Unit 7, Newtec Place, Magdalen Road, Oxford OX4 1RE

Email: office@asylum-welcome.org

Tel: 01865 722082

You may also contact the Information Commissioner's Office (ICO): www.ico.org.uk

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