



## **Privacy Notice**

1. This Privacy Notice sets out how and why the UCL Integrated Legal Advice Clinic (“UCL iLAC”, “we”, “us”, or “our”) collects, stores, uses, shares, and processes any personal information that you provide to us, or that we collect from you. It also explains your rights and how to contact us if you have any concerns with how we deal with your personal information.
2. We are required to deal with your personal information in accordance with the General Data Protection Regulation (GDPR). We are the Data Controllers of your personal information for the purposes of the GDPR.
3. Please read this Privacy Notice carefully – it describes why and how we collect and use personal data and provides information about your rights. It applies to personal data provided to us, both by individuals themselves or by third parties and supplements any other UCL privacy notices which may apply, for example the privacy notice applicable when you visit UCL’s website (see here for further information: [www.ucl.ac.uk/legal-services/privacy](http://www.ucl.ac.uk/legal-services/privacy)).
4. We keep this Privacy Notice under regular review. It was last updated on 29 August 2019.

### ***Who we are***

5. The UCL Integrated Legal Advice Clinic is part of the UCL Centre for Access to Justice at the UCL Faculty of Laws, a department of University College London (“UCL”).
6. UCL is registered as a Data Controller with the Information Commissioner’s Office (registration number Z6364106).
7. UCL has charitable status, and is a company incorporated by Royal Charter with registration number RC000631. UCL is regulated by Research England, and the Office for Students.
8. As a university advice clinic, we are not required to be regulated by the Solicitors Regulation Authority (“SRA”) or the Bar Standards Board (“BSB”). However, solicitors and barristers employed by UCL iLAC are individually regulated by their respective professional bodies, and must act accordingly.
9. We are registered with the SRA, identity number 648056.
10. UCL iLAC is located at: Solar House, 1-9 Romford Road, Stratford, London E15 4LJ.
11. Our website is: <https://www.ucl.ac.uk/access-to-justice/>. We are responsible for this website.

### ***The types of personal information that we collect from you***

12. Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).
13. In order to provide you with legal advice and services, we may collect, use, store and transfer different kinds of personal information about you. This may include:

- a) Your name, address, telephone number, and email address;
  - b) Identity and biographical information such as your nationality, date of birth, passport or driver's licence details, National Insurance Number, employment status and employment history, racial or ethnic origin;
  - c) Details of your marital status and whether you have any dependents;
  - d) Financial details including whether you receive any benefits, income, assets, liabilities, and bank account details;
  - e) Medical information including medical records;
  - f) Housing information including tenancy agreements, and rent payment records;
  - g) Records from social services or schools;
  - h) Information about our meetings and telephone conversations, and other information relating to the provision of our service to you and the outcomes of your case;
  - i) The names and other details about third parties who are involved in the issues we are helping you with; and
  - j) Any other information relating to the matter for which you are seeking our advice.
14. Some of the information that we collect from you may be special category information, which is personal information that is more sensitive, including information relating to: your racial and ethnic origin, religious beliefs, trade union membership, health, and/or information relating to criminal convictions and offences.
15. If we are collecting special category information we will always ask for your explicit consent, and we will only collect and process such information where there is a valid reason for doing so.
16. We will only ask you to provide personal data insofar as it is relevant to the matter that we are assisting you with. If you choose not to provide us with any specific personal data that we request, this may affect our ability to act for or advise you.

### ***How we collect your personal information***

17. We may ask you for your personal information, or you may provide it to us through various means, including:
- a) When you call to make an enquiry or book an appointment;
  - b) When you complete our Client Intake Form at your first appointment;
  - c) When you communicate with us via telephone, post, email, or any other form of electronic communication;

- d) When we collect it from publicly available sources including HM Land Registry, and Companies House;
- e) When we collect it via closed circuit television monitoring at our offices;
- f) When it is provided to us by your GP or medical professionals with your consent;
- g) When it is provided to us by agencies including the Department for Work and Pensions, and local authorities with your consent; and
- h) During the normal course of providing legal advice to you.

### ***How we use your personal information***

18. We will only use your personal information when the law allows us to.

19. We may use your personal information for the following purposes:

- a) To provide legal advice and services to you;
- b) To deal with any complaints or feedback that you might have;
- c) To monitor and evaluate our service so that we can improve on it;
- d) To manage our relationship with you, including financial management and record-keeping;
- e) To ensure compliance with our legal and regulatory obligations;
- f) To provide information required for audits, enquiries, and investigations by regulators and external assessors, including providing information to the Legal Aid Agency under our legal aid contracts; and
- g) For safeguarding purposes, and to ensure the safety of our staff and clients;

20. We may also use pseudonymised data, meaning data from which you cannot be directly identified, for the purposes of:

- a) Education and research;
- b) Service evaluation;
- c) Fundraising and promotional purposes; and/or
- d) Published reports or presentations at conferences

### ***Our bases for collecting and processing your personal information***

21. Your personal data will be collected and processed primarily by our staff and UCL students working on your case.

22. We can only process your personal information if we have a lawful reason for doing so.

23. We may collect, use and process your personal information for the purposes set out above on the basis of one (or more) of the following lawful bases:

- a) You have consented to the processing;
- b) We need to process the information in order to perform legal services for you or represent you;
- c) We need to process the information in order for us to comply with our legal and regulatory obligations; and/or
- d) The processing is necessary for our legitimate interests (including the operation of UCL iLAC, and the provision of professional services).

24. If we need to collect, use or process special category information, we will only do so when you have given us explicit consent or where it is necessary for the establishment, exercise or defence of legal claims.

### ***Who we may share your personal information with***

25. We may need to share your personal information with the following:

- a) Other parties involved with your matter and their legal representatives, including the Department for Work and Pensions, HMRC, local authorities, HM Courts and Tribunals Service, and other government departments and agencies;
- b) Third parties we ask to help with your matter, including barristers, solicitors, other advice agencies, medical professionals, and other experts;
- c) External auditors and regulatory bodies, including the Solicitors Regulation Authority and the Legal Aid Agency;
- d) Our financial controllers; and
- e) External service suppliers including translation/interpreting services. We will only allow external service providers to handle your personal information if we are satisfied that they will take the appropriate measures to protect your personal information.

26. We may be required by law to disclose certain information to the police or another relevant authority in some circumstances for example where we think you or someone else is at serious risk of harm.

27. If we share your personal information, it will always be shared in a secure format. If we share your information electronically, the documents will be password protected, and the email subject headings will be anonymised.

### ***International transfers***

28. We do not transfer your personal data outside the European Economic Area (EEA).

### ***Where we store your personal information***

29. We have put in place appropriate security measures to prevent your personal data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. We have established procedures to deal with any suspected personal data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.
30. We store electronic copies of your personal information securely on servers within UCL Backup copies of your personal information is stored securely on our case management system AdvicePro.
31. We store hard copies of your personal information in locked cabinets at our UCL iLAC offices.

***How long we will keep your personal information for***

32. We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements
33. We will keep your personal information whilst we are advising and assisting you and for 6 years after your case with us has been completed and we are no longer providing any legal advice or services to you on that case. Your case file will then be destroyed.
34. If you are child under 18 years of age, or your case with us involved a child who is under 18 years of age, then we will keep your personal information for 6 years after the child in question turns 18. The case file will then be destroyed.
35. If you open an enquiry with us but we are unable to take your case on, we will keep the personal information that you provide to us during the enquiry process for 6 years after your enquiry is closed, after which it will be destroyed. This is the case for enquiries whether you are an adult, or a child under 18 years of age.
36. We will keep your personal information for these time frames for the following reasons:
  - a) To respond to any questions, complaints, or claims made by you;
  - b) To show that we have handled your case fairly; and
  - c) To ensure that we are providing a good service.

***Your rights***

37. Under the GDPR you have the right to:
  - a) Ask for access to, and copies of, the personal information we hold about you, and information about how and why we are processing it;
  - b) Require us to correct any inaccuracies in the personal information we hold about you;
  - c) In some circumstances, to require us to erase your personal information;
  - d) In some circumstances, to require us to restrict our data processing activities;
  - e) Ask for us to provide the personal information we hold about you in a reasonable format as requested by you, or send that information to a third party;

- f) Object to us using your personal information; and
  - g) Withdraw your consent, where our use of your personal information is based on that consent.
38. Please note that these rights are not absolute, and we may be entitled to refuse requests where exceptions apply.
39. You also have the right not to be subject to a decision based solely on automated decision-making and profiling (which means a decision that is made only by automated means without any human involvement). We may use automated decision-making to check your benefits entitlements, or whether you are eligible for legal aid. We will only do this with your explicit consent, and we will not rely solely on such decisions.
40. You also have the right to complain to the Information Commissioner's Office, which can investigate whether we are complying with data protection law and has enforcement powers, if you are not happy with how we are collecting and processing your personal information. For further information on your rights and how to complain to the ICO, please refer to the ICO website at <https://ico.org.uk>.

### **How to contact us**

41. If you have any questions about this Privacy Notice, or how we collect, use, or process your personal information, you can contact us by phone: 020 3108 8499, or by email: [legalclinic@ucl.ac.uk](mailto:legalclinic@ucl.ac.uk); or by post: 3rd Floor, Solar House, 1-9 Romford Road, London E15 4LJ.
42. You can contact UCL by telephoning: +44 (0)20 7679 2000, or by writing to: University College London, Gower Street, London WC1E 6BT.
43. Please note that UCL has appointed a Data Protection Officer, Alex Potts. If you have any questions about this Privacy Notice, including any requests to exercise your legal rights, you may also contact our Data Protection Officer using the details set out below:

Alex Potts  
Data Protection & Freedom of Information Officer  
[data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) or [a.potts@ucl.ac.uk](mailto:a.potts@ucl.ac.uk)  
+44 (0)20 3108 8726

### **Complaints**

44. If you wish to complain about our use of personal data, please send an email with the details of your complaint to [data-protection@ucl.ac.uk](mailto:data-protection@ucl.ac.uk) so that we can look into the issue and respond to you.

### **Changes to this Privacy Notice**

45. We may update this Privacy Notice from time to time. We will publish any new versions of this Privacy Notice on our website, and will provide you with a copy where practicable.