

## **International Literacy Centre Privacy notice**

### **General Data Protection Regulation (GDPR):**

### **General Privacy Notice for Reading Recovery teacher leaders and teacher leader providers**

ILC based at UCL ("we", "our", "us") are committed to protecting and respecting your privacy.

This privacy notice sets out how we use and protect the information you provided to us in electronic and paper form, and the information obtained from visiting and using ILC website

<http://www.ucl.ac.uk/international-literacy>.

This notice supplements other UCL privacy notices which may apply e.g. the student (if you apply to study here) and staff (if you work with us on a fee paid contract as the RR associate).

### **About us**

The International Literacy Centre is part of the Department of Leadership and Learning at UCL Institute of Education. The core of our activity is to provide service to areas implementing Reading Recovery, a trademarked school-based literacy programme for children aged five or six.

UCL, a body incorporated by royal charter (number RC 000631), is the entity that determines how and why your personal data is processed. In accordance with Data Protection Legislation, we are a Controller and this means that we are legally responsible for the personal data we collect and hold about you.

### **ILC / UCL data protection obligations**

One of our responsibilities is to tell you about the different ways in which we use your personal data – what information we collect, our legal basis for doing so, why we collect it, where we collect it from and whether (and with whom) we will share it. We also need to tell you about your rights in relation to the information. This statement provides further details about all of these issues.

### **What is personal data?**

'Personal data' means any information which identifies you as an individual. It may include your name but it may also be other information such as your date of birth, nationality and gender which when combined identify you.

## **What information we collect about you**

In order to provide you with the support for the Reading Recovery programme implementation in your area, we collect, use and store different kinds of personal data about you.

- Personal details (such as your name, contact details and email address, work contact details, Teacher Leader Provider's name and contact details) that you provide by registering with us
- Details about the Reading Recovery schools you work with (Reading Recovery teachers' names, schools' names and addresses, HTs names)
- Service Level Agreement fees and payment information
- Your responses to surveys which we ask you to complete in order to improve and administer the RR programme
- How you use the ILC website and any other information you post, email or send to us

## **Purposes for which we process your personal data**

We process information we hold about you for the following purposes:

We will use the information you give to us:

- to process your annual accreditation which enables you to offer the trademarked Reading Recovery programme in your area
- to process your participation in the Reading Recovery Europe and maintain the register of accredited RR teacher leaders, teachers and schools
- to operate quality assurance processes and arrangements and monitor essential standards for Reading Recovery
- to administer the financial aspects of your relationship with us
- to enable effective communications with you
- to support advocacy, promotion and marketing strategy to aid recruitment of schools to Reading Recovery
- to help you with your enquiry and provide advice on quality control of RR implementation in schools
- to manage the use of resources, facilities and participation at events (e.g. resources on Moodle, professional development days, conferences)
- to keep in touch with you via the RR Affiliates Network, if you no longer work as a RR teacher leader

## **Using your information in accordance with data protection laws**

Data Protection Laws require that we meet certain conditions before we are allowed to use your data in the manner described in this notice, including having a "legal basis" for the processing. We take our responsibilities under Data Protection Laws extremely seriously, including meeting these conditions. The legal bases on which your personal data are collected are explained below.

**Consent:** We may ask you to provide us with special category or sensitive personal data as detailed above which we will agree only to process with your express consent (e.g. the use of case studies, photos, quotes, statements in our promo materials).

**Performance of contract:** The processing of your personal data is necessary in relation to the contract we have entered into with you to provide Reading Recovery services to schools in your area.

**Public interest:** The processing of your personal data may be necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in us.

**Legitimate interests:** The processing of your personal data may be necessary for the purposes of the legitimate interests pursued by us, except where such interests are overridden by your interests or by fundamental rights and freedoms which require protection of personal data. It may be necessary for our legitimate interests to collect your personal data to enable us to manage certain operations of the ILC effectively.

## Who is my personal information shared with?

We will not disclose any personal information about you to other external enquirers or organisations without your consent unless it is in your vital interests to do so (e.g. in an emergency situation).

The details of your Reading Recovery centre with your contact information is listed on the ILC website.

Access to your personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job at ILC.

## Principles

We will handle your personal data in accordance with the principles set out below.

| Principle                             | Personal Data shall be:  |
|---------------------------------------|--|
| Lawfulness, fairness and transparency | processed lawfully, fairly and in a transparent manner in relation to the data subject.  |
| Purpose limitation                    | collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.                |
| Data minimisation                     | adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.  |
| Accuracy                              | accurate and, where necessary, kept up to date.  |
| Storage limitation                    | kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed. |
| Integrity and confidentiality         | processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing           |

|                |  |
|----------------|--|
|                | and against accidental loss, destruction or damage, using appropriate technical or organisational measures |
| Accountability | be able to demonstrate compliance with the above principles  |

## How we will protect information about you

Data Protection Legislation obliges us to follow security procedures regarding the storage and disclosure of personal information in order to avoid unauthorised loss or access. As such ILC / UCL has implemented security systems and procedures to protect information from unauthorised disclosure, misuse or destruction. 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.

## Data retention

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, and in accordance with UCL Records Retention Schedule <http://www.ucl.ac.uk/library/docs/retention-schedule.pdf> .

## Your rights

You have the following rights in relation to your personal data:

**Right 1:** A right to access personal data held by us about you (please see section entitled "Requesting information" below).

**Right 2:** A right to require us to rectify any inaccurate personal data held by us about you.

**Right 3:** A right to require us to erase personal data held by us about you. This right will only apply where, for example, we no longer need to use the personal data to achieve the purpose we collected it for; or where you withdraw your consent if we are using your personal data based on your consent; or where you object to the way we process your data (in line with Right 6 below).

**Right 4:** A right to restrict our processing of personal data held by us about you. This right will only apply where, for example, you dispute the accuracy of the personal data held by us; or where you would have the right to require us to erase the personal data but would prefer that our processing is restricted instead; or where we no longer need to use the personal

data to achieve the purpose we collected it for, but we require the data for the purposes of dealing with legal claims.

**Right 5:** A right to receive personal data, which you have provided to us, in a structured, commonly used and machine readable format.

**Right 6:** A right to object to our processing of personal data held by us about you.

**Right 7:** A right to withdraw your consent, where we are relying on it to use your personal data.

**Right 8:** A right to ask us not to use information about you in a way that allows computers to make decisions about you and ask us to stop. *Please note we do not carry out automated decision-making or profiling.*

## Requesting information

As noted above, you have the right to access information held about you. Your right of access can be exercised at any time by contacting us at [ioe.ilc@ucl.ac.uk](mailto:ioe.ilc@ucl.ac.uk)

## Keeping personal data up-to-date

The Data Protection Laws require us to take reasonable steps to ensure that any personal data we process is accurate and up-to-date. Employees (e.g. RR Associates) are responsible for informing us of any changes to the personal data that they have supplied during the course of their employment.

## Changes to this Privacy notice

Our Privacy Notice may be updated from time to time. We will notify you about any updates. This notice was last updated in May 2018.

## How to contact us

International Literacy Centre, UCL Institute of Education, 20 Bedford Way, London WC1H 0AL Tel: +44 (20) 7612 6585 [ioe.ilc@ucl.ac.uk](mailto:ioe.ilc@ucl.ac.uk)