

## **International Literacy Centre Privacy notice**

### for schools participating in the Reading Recovery programme

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

International Literacy Centre (ILC) based at University College London UCL ("we", "our", "us") are committed to protecting and respecting your privacy and that of your pupils.

This privacy notice sets out how we use and protect the information you provide to us about your Reading Recovery teacher and school setting, and the data we collect on children and their progress in Reading Recovery as part of national monitoring and quality assurance for the programme.

#### **About us**

The International Literacy Centre is part of the Department of Leadership and Learning at UCL Institute of Education. Within the Centre we provide Reading Recovery, a school literacy programme for children aged five or six who need extra help with reading and writing.

We collect data about children participating in Reading Recovery to monitor the programme and ensure it is working well, alongside some data on the school characteristics and on the Reading Recovery teachers who deliver the programme. Reading Recovery teachers enter the data they collect via a unique survey link and the data is stored securely in the Reading Recovery Evaluation Database (RRED) within UCL Data Safe Haven. The data is monitored and approved by a Reading Recovery teacher leader who is accredited by ILC to deliver the RR professional development programme to teachers in a local area / district. Every year we analyse the data collected and produce national monitoring reports, which go back to local teacher leaders (and schools).

UCL, a body incorporated by royal charter (number RC 000631), is the entity that determines how and why any personal data we collect as part of Reading Recovery is processed. In accordance with Data Protection Legislation, ILC is a Controller and this means that we are legally responsible for the personal data we collect and hold about your school, the Reading Recovery teachers and any children participating in Reading Recovery.

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

One of our responsibilities is to tell you about the different ways in which we use any 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.

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

'Personal data' means any information which identifies either teachers or children as an individual. It may include name, date of birth, nationality, gender and pupil disadvantage which when combined could identify a specific individual.

### **What information we collect about schools participating in Reading Recovery**

School name and address, school id and the number of children in the school in an average year group.

### **What information we collect about teachers who deliver Reading Recovery**

#### **Reading Recovery Teacher personal details:**

Name, current responsibilities, name of teacher's school, number of years in RR, and time committed to teaching RR. We also collect email addresses from Reading Recovery teachers as this is the mechanism we use to give them access to the secure website where Reading Recovery pupil data is logged. This enables us to monitor and report on pupil progress.

### **What information we collect about children participating in Reading Recovery**

#### **Pupil personal details:**

Name, unique pupil number, gender, date of birth, first language, ethnicity, pupil poverty indicator, current year at school, if they have any special education needs, pupil's test data on entry to and exit from Reading Recovery, pupil's literacy achievement in relevant national curriculum tests, how many Reading Recovery lessons they received and how many they missed.

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

We will use the information about your school, Reading Recovery teachers and children

- To give parents / guardians records of children's progress in Reading Recovery
- To assist your school and Reading Recovery teacher in monitoring how well the children who need extra help are progressing
- To help local authorities /districts/ teacher leader providers to make decisions about how well they are supporting children struggling with reading and writing
- To provide Reading Recovery annual reports at school, local and national level showing the impact Reading Recovery is having. You can download the national reports from <http://www.ucl.ac.uk/reading-recovery-europe/reading-recovery/reports>

- To continue to improve the Reading Recovery programme so that it supports the needs of all children who struggle with reading and writing

## **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 teachers' and children's personal data are collected are explained below.

**Consent:** We ask parents/ guardians of children who participate in Reading Recovery to give us their informed consent for the child's data to be collected and processed by International Literacy Centre.

We will agree to process the data only with their express consent. The consent form is available from the Reading Recovery teacher leader. We ask that teachers keep a hard copy of this consent form.

We ask your consent to collecting data on Reading Recovery in your school as a condition of participating in the programme.

**Performance of contract:** The processing of the personal data is necessary in relation to the agreement we have entered into with you via the Teacher Leader to provide Reading Recovery programme to your school.

**Public task:** The legal basis for processing the data is the public task of providing education, research and knowledge exchange. We want to improve the quality of our teaching in Reading Recovery and monitor Reading Recovery children's performance.

**Legitimate interests:** We collect the personal data to enable us to manage Reading Recovery effectively. The processing of the personal data is 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.

## **Who is the personal information shared with?**

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

Access to the personal information is limited to staff who have a legitimate need to see it for the purpose of carrying out their job at International Literacy Centre and who work as a Reading Recovery teacher leader to oversee the RR programme in a local area / district.

## Principles

We will handle the 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 the information about your school, Reading Recovery teachers and children

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. Personal Data will be stored within the UCL Data Safe Haven to which only accredited members of the project team have access. All reports about the RR implementation sent to schools, Reading Recovery teachers and teacher leaders are anonymised.

## Data retention

The data is kept for no longer than 10 years in line with UCL guidance on retention of records for research.

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

## The rights of Reading Recovery teachers and parents/guardians of Reading Recovery children

They have the following rights in relation to their personal data:

**Right 1:** A right to access their personal data held by us. Please see section "Requesting information" below.

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

**Right 3:** A right to require us to erase personal data held by us about them. 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 them. This right will only apply where, for example, they dispute the accuracy of the personal data held by us; or where they would have the right to require us to erase the personal data but would prefer that our processing is restricted instead.

**Right 5:** A right to receive personal data 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 teachers and children participating in Reading Recovery.

**Right 7:** A right to withdraw their consent, where we are relying on it to use their personal data. Parents/ guardians should inform the Reading Recovery teacher if they wish to withdraw their consent or email International Literacy Centre at [ioe.ilc@ucl.ac.uk](mailto:ioe.ilc@ucl.ac.uk)

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

## **Requesting information**

As noted above, teachers and parents / guardians of Reading Recovery children have the right to access information held by us about them. Please contact us at [ioe.ilc@ucl.ac.uk](mailto:ioe.ilc@ucl.ac.uk) to request this information.

## **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 November 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)