



SPPA

Social Pedagogy
Professional Association

Record of Processing Activity 2018-2019

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1. Data Protection Policy Statement

The Social Pedagogy Professional Association is fully committed to full compliance with the requirements of the General Data Protection Regulation (GDPR). The organisation will therefore follow procedures which aim to ensure that all employees who have access to any personal data held by the organisation are fully aware of and abide by their duties under the GDPR.

1.1. Statement of policy

The Social Pedagogy Professional Association needs to collect and use data about its members in order to operate and carry out its functions. This personal data must be handled and dealt with properly however it is collected, recorded and used.

The Social Pedagogy Professional Association regards the lawful and appropriate treatment of personal data as very important to its successful operations and essential to maintaining confidence between the association and its members. We therefore fully endorse and adhere to the Principles of the GDPR.

1.2. Handling personal/special category data

The Social Pedagogy Professional Association will, through management and use of appropriate controls, monitoring and review:

- Use personal data in the most efficient and effective way to deliver better services.
- Strive to collect and process only the data or information which is needed.
- Use personal data for such purposes as are described at the point of collection, or for purposes which are legally permitted.
- Strive to ensure information is accurate.
- Not keep information for longer than is necessary.
- Securely destroy data which is no longer needed.
- Take appropriate technical and organisational security measures to safeguard information (including unauthorised or unlawful processing and accidental loss or damage of data).
- Ensure that information is not transferred abroad without suitable safeguards.
- Ensure that there is general information made available to the public of their rights to access information.
- Ensure that the rights of people about whom information is held can be fully exercised under the General Data Protection Regulation.

These rights include:

- The right to be informed.
- The right of access to personal information.
- The right to request rectification.
- The right to request erasure.
- The right to restrict processing in certain circumstances.
- The right to data portability.
- The right to object to processing.

1.3. Principles of GDPR

Anyone processing your personal data must comply with 6 principles of good practice. These principles are legally enforceable.

Summarised, the principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.
2. Collected for specified, explicit and legitimate purposes and not further processed in an manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
4. Accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
5. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.
6. 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 in accordance with the rights of data subjects under the GDPR.

The GDPR provides conditions for the processing of any personal data. It also makes a distinction between personal data and 'special category' data.

2. SPPA governance

The Social Pedagogy Professional Association (SPPA) is a Company Limited by Guarantee. It is a professional membership body for UK social pedagogues, and the centre for excellence of UK social pedagogy.

The Data Processor is SPPA's Project Officer. They can be reached by phone on 020 7612 6954 or by email on sppa@ucl.ac.uk. They determine the purposes for which and the manner in which any personal data is, and is to be processed.

3. What we do with your data

As a professional membership organisation, we collect the personal data of our members. We collect this and store it on our password protected CRM. We regularly make secure copies of this data and save it to a password protected shared drive which the SPPA team can access. Our members provide this data to us willingly although most data fields are mandatory for membership. We provide a declaration which states we handle their data in accordance with the Data Protection Act 1998, and that it will not be shared without their consent. We do however allow people to opt-in to their data being shared for active marketing related to social pedagogy qualifications.

We also allow non-members to sign-up to our mailing list. They provide less personal data in order to do this. We provide a declaration which states we handle their data in accordance with the Data Protection Act 1998, and that it will not be shared without their consent. We regularly extract this personal data and store it on our password protected MailChimp account. We do this in order to send out bi-monthly Newsletter – we allow recipients to opt-out of this mailing list. This newsletter provides updates on the wider social pedagogy sector, including some active marketing related to social pedagogy qualifications.

4. Categories of our data

At present, we collect the following data from SPPA members. This data is stored securely on our password protected CRM, accessible only to the SPPA team:

- First and Last Name
- Address
- Gender
- Email
- Phone Number
- Job Title
- Employer
- Sector
- Work Address
- Username

Users can be uniquely identified by this data and as such, it is treated as personal data as per the Information Commissioner's Office guidelines.

Our members also provide the following 'special category' data. This data is stored securely on our password protected CRM, accessible only to the SPPA team:

- Ethnic group

We also collect the following data from our mailing list. This data is stored securely on our password protected CRM, accessible only to the SPPA team:

- First and Last Name
- Email
- Phone Number (optional)

Users can be uniquely identified by this data and as such, it is treated as personal data as per the Information Commissioner's Office guidelines.

Individuals provide this data to us willingly although most data fields are mandatory. We provide a data protection statement which states that we handle their data in accordance with the Data Protection Act 1998, and that it will not be shared without their consent.

5. Retention of your data

We retain personal data supplied by SPPA members indefinitely as long as they are fully paid members of SPPA. We hold this personal data in order to support our activities, targeting events and resources at particular regions and occupational groups.

If they do not renew their membership, we retain their data for one year, in order to allow them to re-join without manually re-supplying this data. The data held for expired members is stored separately from fully paid SPPA members on our CRM.

We retain the data supplied by our mailing list indefinitely, although allow recipients the option to unsubscribe on each mailing. The data held for our mailing list is stored separately from SPPA members on our CRM.

6. Security of your data

The General Data Protection Regulation requires us to process and store personal data securely. Our security measures ensures three things:

1. That data can only be accessed, altered and seen by the SPPA team.
2. That data is accurate and complete in relation to why we are processing it.
3. That data remains accessible, usable and recoverable if lost and altered.

Until 30 April 2019, the Social Pedagogy Professional Association operates as part of an Enterprise project at University College London (UCL). All of our hardware and software is provided and secured by UCL. As such, we operate using the [UCL Information Security policy](#).

In summary, in all of our day-to-day work, SPPA stores all personal data on its password protected CRM. It takes monthly extracts of this data and stores it in a password protected shared folder, accessible only to members of SPPA staff. We do not take paper copies of any personal information.

7. Principles of GDPR

Under the GDPR, anyone processing your personal data must comply with 6 principles of good practice. These principles are legally enforceable.

The principles require that personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to individuals.

Any data collected by SPPA will meet the law as described in GDPR. It will be clear when data will be processed and any processing will match the consent we request in the descriptions that we provide on our website.

2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

We collect and retain personal data from members and non-members in order to better tailor our activities. As a membership organisation that hosts events, we use personal data to target geographical regions and specific occupational groups. This data will be kept for varying periods, outlined above in section 5 of this document.

3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

The only data that is processed by SPPA is:

- First and Last Name
- Gender
- Ethnic group
- Email
- Phone Number
- Employer
- Sector

We use this data to populate our mailing list and to keep track of our membership demographic. This allows us to ensure SPPA is representative of the population, and as a result, we can target our events at particular genders, ethnic groups and occupational groups.

4. Accurate and where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

All SPPA members are required to enter up-to-date information as a condition of joining the organisation. They can then alter and update this information at any time. We archive this data and store it in a shared folder accessible only to the SPPA team. We update this once a month, which replaces any previous archives, taking into account any member updates.

Non-members that sign-up to our mailing list are not currently able to update their information manually. They can sign-up as many times as they like with as many email addresses as they can. We archive data and store it in a shared folder accessible only to the SPPA team. We update this once a month, although any new email addresses which are entered do not automatically replace old addresses.

5. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals.

Personal data is kept for varying degrees of time, dependent on whether an individual is a SPPA member or just signed up to our mailing list. These degrees are outlined in section 5 of this document.

6. 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 in accordance with the rights of data subjects under the GDPR.

As a member of UCL, we guarantee the security of our data by following UCL's Information Security policy. Alongside this, any data is stored within a password protected CRM and any archives are held in a secure folder accessible only to the SPPA team.

8. Your rights of access

SPPA is fully committed to full compliance with the requirements of the GDPR. It is also committed to its members and their rights with regards to their personal data. As per the GDPR, the subjects of our data (hereby, 'data subjects') have the following rights:

- The right to be informed.

All data subjects will be provided with a copy of our privacy policy and our record of processing activity before agreeing to share their personal data when joining, either as a member or on our mailing list. Both of these resources will be available on our website.

- The right of access to personal information.

All data subjects will be provided with an explanation of how we intend to process their data on joining. We will give all data subjects the right to access their personal data free-of-charge, and will comply with any request within one month of receipt.

- The right to request rectification.

We give all data subjects the right to rectify their own data. They may also request the SPPA team to do this on their behalf. We will comply with any request within one month of receipt.

- The right to be forgotten.

All data subjects have the right to be forgotten, if they rescind their member status, or if they choose to unsubscribe from our mailing list. Any members that fail to renew their SPPA membership within one year will be automatically forgotten.

- The right to restrict processing in certain circumstances.

In some cases, we share personal data with partners that will use the data for collaboration on projects, or for direct marketing:

- First and Last Name
- Email
- Phone Number
- Employer

In the case of direct marketing, data subjects choose to give their consent for this when they become members of the SPPA. We will always seek consent of the data subject via email or telephone when sharing information not for active marketing. Data subjects are allowed to restrict this processing of data where they feel it is inaccurate, or if they object to the basis on which we are processing it.

- The right to data portability.

Our CRM allows us to extract group and individual data quickly and easily. This can be saved in a structured, commonly used and machine readable format (i.e. CSV files). We are able to send this to the individual, or to any organisation that they require. We use secure file transfer software provided by UCL to ensure the security of this data when transferring outside of the SPPA team. We will comply with any request to transfer data free-of-charge and within one month.

- The right to object to processing.

All data subjects have the right to object to their data being used for direct marketing or being shared amongst partners. This right to object is provided to data subjects when they enrol as SPPA members or as subscribers to our mailing list. Data subjects are able to object to this direct marketing from partners when they join as members, and subscribers are able to unsubscribe from our mailing list any time.

9. Review

This policy will be reviewed at intervals of 1 year to ensure it remains up to date and compliant with the law. It will be reviewed next in May 2019.

10. Contact us

If you have any questions with regards to this policy or your personal data, feel free to contact SPPA at:

Social Pedagogy Professional Association
c/o Thomas Coram Research Unit (TCRU)
UCL Institute of Education
27 Woburn Square
London WC1H 0AA

Email: sppa@ucl.ac.uk

Telephone number: (+44) 020 7612 6954