



SPPA
Social Pedagogy
Professional Association

Privacy Policy 2018-2019

A. The scope of this policy

SPPA needs to keep certain information on its Members, employees, volunteers, service users and trustees to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

The organisation is committed to ensuring any personal data will be dealt with in line with the General Data Protection Regulation (GDPR). To comply with the law, personal information will be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

This Privacy Policy sets out how SPPA uses and protects any information that you give us when you use our website and any others managed by SPPA such as our social media pages. SPPA is committed to ensuring that your privacy is protected.

This policy covers all employed staff, trustees, volunteers, Members & users of its services.

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1. Principles of GDPR

In line with the General Data Protection Regulation principles, anyone processing the personal data you supply to SPPA will ensure all data is:

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 definition of 'Processing' is obtaining, using, holding, amending, disclosing, destroying and deleting personal data. This includes some paper based personal data as well as that kept on computer.

The way we ensure compliance with each of the above principles is outlined in our Record of Processing Activity.

2. Type of data processed

SPPA processes the following personal information:

- Name & Date of Birth
- Addresses – both personal & professional
- Email and Phone Numbers
- Gender
- Job Title

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 General Data Protection Regulation, and that it will not be shared without their consent.

3. What we do with our data

We outline our practices with this information more clearly in our Record of Processing Activity. This is accessible [here](#). 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.

- We may periodically send promotional emails about membership offers, events, or other information which we think you may find interesting using the email address which you have provided if you have requested these
- We may also use your information to contact you for market research purposes. We may contact you by email, phone or post. We may use the information to customise the website according to your interest.
- Where you have given us consent, information provided for Qualification queries are processed and shared with 'Scaling up Social Pedagogy' project Centres, Jacaranda Recruitment and ThemPra Social Pedagogy, who provide and deliver the Diploma qualifications.

4. Retention of your data

We retain personal data supplied by SPPA members indefinitely so long as they remain 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 SPPA 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.

5. Notification

The needs we have for processing personal data are recorded on the public register maintained by the Information Commissioner. We notify and renew our notification on an annual basis as the law requires.

If there are any interim changes, these will be notified to the Information Commissioner within 28 days.

The name of the Data Controller within our organisation as specified in our notification to the Information Commissioner is the SPPA Project Officer, Carla Aylmore.

6. Security of your personal 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](#).

Any personal data you supply to us, is stored securely on our password-protected Customer Relation Management (CRM) system. Any payment transactions will be encrypted. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We will not, and ask you not to share a password with anyone.

We will not sell, distribute or lease your personal information to third parties unless we have your permission or are required by law to do so. We may use your personal information to send you promotional information about third parties which we think you may find interesting if you tell us that you wish this to happen. You may request details of personal information which we hold about you under the Data Protection Act 1998 and the General Data Protection Regulation 2018. If you would like a copy of the information held on you please write to the address shown on our contact page. If you believe that any information we are holding on you is incorrect or incomplete, please write to us or [email us](#) as soon as possible, at the below address. We will promptly correct any information found to be incorrect.

6.1. Links to other websites

Our website may contain links to other websites. However, you should note that we do not have control over these websites. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Privacy Policy. SPPA membership and event tickets are currently purchased on the UCL online store, you can view their Privacy Policy [here](#). We advise all visitors to exercise caution when using these websites and to look at the Privacy Policy applicable to each website in question.

7. Training

To ensure SPPA staff are informed and versed in the General Data Protection Regulation, training will take the following forms:

On induction:

- All staff, volunteers and Trustees will receive copies of this policy and other relevant guidelines relating to the GDPR.
- Until April 2019, all staff will undertake mandatory UCL training into the GDPR.
- Will be required to sign to acknowledge their receipt & understanding of the GDPR.
- Where appropriate, will be provided with security information (passwords, keys etc) and be required to acknowledge the importance of retaining privacy and security for files, documents, computer systems etc.

General training/ awareness raising:

- All staff, volunteers and Trustees will receive bi-annual reminders and/or updates relating to the GDPR.

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:

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