



Innovations for Learning: TutorMate Privacy & Data Policy for Volunteer tutors

This privacy policy sets out how Innovations for Learning (IFL) uses and protects any information that you provide us when you complete an online application form to become a volunteer tutor, use our TutorMate website or when we record information that relates to your active volunteering with us. IFL is committed to ensuring that your privacy is protected and that any information that you give us will only be used in accordance with this privacy policy.

IFL may change this policy from time to time and will notify you of any changes. The current version of this policy is effective from June 2018.

1. IFL Contact information

To contact us in relation to any of the information contained in this policy notice, or to pursue any of your rights under the General Data Protection Regulation (further information below), please email emma@innovationsforlearning.org

2. The Data Protection Principles

IFL applies the **Eight Data Protection Principles** to its data that it uses or **'processes'**:

1. Personal data will be processed fairly and lawfully.
2. Personal data will be obtained only for the purpose specified.
3. Personal data kept will be adequate, relevant and not excessive for the purposes required.
4. Personal data shall be accurate.
5. Personal data will not be kept for longer than is necessary for purpose.
6. Personal data will be processed in accordance with the rights of data subjects.
7. Appropriate technical and organizational measures will be taken against unauthorized or unlawful processing of personal data and against accidental loss, destruction or damage to personal data.
8. Personal data will not be transferred outside the EEA unless that country or territory ensures an adequate level of data protection for the rights and freedoms of data subjects.

3. The legal basis on which we hold your data/information

Organisations are permitted to process data if they have a legal basis for doing so. IFL processes data on the basis that:

- You have given us your express and informed consent to process your data; and/or
- IFL has a legitimate interest in processing data; and/or
- It is necessary in relation to a contract or agreement which you have entered into

4. The information we record and use

We record and use the following information **only if and when you apply to volunteer with us:**

- name and organisation;
- contact information including mobile number and email address and city/region you plan to tutor in;
- other information directly relevant to volunteer applications e.g languages you speak

If you are successful in applying to volunteer with us, we may record and use the following further information:

- your DBS status including the issue date, certificate number and a copy of your certificate where relevant (see section on 'How we process and use DBS checks');
- your volunteering history with us, and notes on your engagement and time spent in tutoring sessions;
- content of any feedback surveys, case studies or quotes you voluntarily provide;
- pupils you have worked with and their reading progress

5. The reasons why we record and use your information

IFL considers the information we record and use to fall within the reasonable expectations and legitimate interests of individuals who voluntarily apply to and/or consent to be part of TutorMate. Information recorded **if and when you apply to volunteer with us** is primarily used to:

- to assess your suitability to volunteer with the young people we specifically support;
- to gather your contact information so we can tell you about volunteer opportunities and give you logistical information relating to these volunteer activities (core communications)
- to send you additional TutorMate-related communications (see section 7).

Further information we record or request **if you are successful in applying to volunteer with us** may be used in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- record your engagement on our tutoring programmes;
- analyse and improve our programme delivery and impact.

6. Our Enhanced DBS (Disclosure and Barring Service) procedure

To meet our responsibilities in relation to child protection and safeguarding, it is necessary for all our volunteer tutors to complete a full Enhanced DBS check, for which IFL will cover the cost.

We sub-contract an external online provider uCheck to process our DBS checks. Once you have registered with us, you will receive an email with instructions on how to complete an initial online DBS application form. You will then be asked to show the necessary identification to a designated employee of your organisation so the application can be completed.

Completing the DBS application will involve providing some of your personal details to uCheck. If your DBS certificate is clear, we may share your DBS certificate details with partner schools in order to meet our safeguarding responsibilities. If your DBS certificate has a caution or conviction, we will request further details from you in order to complete a risk assessment, which we will then ask you to approve as consent for us to share it with our partner schools. Please note that once you have given permission for us to share details of a DBS certificate to a partner school, we cannot guarantee a school's policy to securely store the information, or only retain the details for a limited time.

7. Our communications with you

IFL may contact you via email, phone or text. Aside from communicating logistical information to you during your volunteer activities ('**core communications**'), IFL may periodically contact you via email with '**additional communications**' such as the below;

- newsletters, tutoring tips & education policy updates;
- information about events relevant to your volunteering
- other ways to support us including optional donations, becoming an ambassador, developing a quote or case study on your volunteering, engaging in fundraising activities or social media;
- invitations to complete optional surveys or undertake word-of-mouth promotion of TutorMate to friends or colleagues.

Our emails include clear and easy opportunities to opt-out of these additional communications. However, if you no longer wish to receive these additional emails, or you would like no further contact from IFL entirely including our core communications, you can contact us at any time via email: help@tutormate.org and we will remove you from our contact lists within three working days.

8. The storage, maintenance and upkeep of your information

We are committed to ensuring that your information is **stored securely**. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure data, including:

- the use of a limited access & password protected database;
- suitable cyber-security safeguards and best practices;
- secure and timely destruction of any additional digital or hard-copies of information excluding that which is recorded on our database.

We are committed to ensuring that the information we keep about you is **accurate and up to date**. We will therefore:

- update records as soon as possible whenever new information is supplied to ensure personal data is kept up-to-date.
- delete or correct information that is found to be inaccurate as soon as reasonably practicable

Information recorded at the volunteer application stage and during any voluntary activities with IFL may be retained in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- maintain a record of unsuccessful applications;
- maintain a record of individual requests to restrict further use or 'processing' of their personal information, or requests for IFL to cease contacting them, in order to respect these requests in future;
- to ensure we don't accidentally duplicate information;
- while data may be made inactive and/or inaccessible, IFL may not delete all personal data when your volunteering ends unless requested by you to do so. We will retain enough information necessary to confirm that the relationship existed – and that it has ended – as well as such details as may be reasonably necessary for one of the reasons given above;
- we will not keep your personal data for longer than is necessary unless we are required to do so by law or unless we have legitimate reasons to do as outlined above.

We may store or transfer the personal information we collect about you to affiliates or trusted third party recipients in the United States of America. IFL will take steps to ensure that your data that is transferred to the USA is treated securely and in accordance with this Privacy Policy, which steps may include verification that organisations are certified under the EU-US Privacy Shield Framework.

When you consent to participate in the TutorMate programme, you are consenting to the collection, international transfer, storage, and processing of your information for the purposes outlined in this Privacy Policy.

9. Information sharing

IFL may use your information in an aggregated and anonymised format in order to undertake statistical analysis or share reports with third parties. We may share some of your personal information with our partner schools, in order to coordinate tutor-pupil pairings. We will not sell, distribute or lease your personal information to any other third parties unless we have your permission or are required by law to do so.

10. Web browsing and Cookies

A cookie is a small file which asks permission to be placed on a computer's hard drive. Once an individual agrees, the file is added and the cookie helps analyse web traffic or when a particular site is visited. Cookies allow web applications to respond to an individual user. The web application can tailor its operations to their needs, likes and

dislikes by gathering and remembering information about their preferences. Overall, cookies help IFL provide visitors with a better website, by enabling us to monitor which pages they find useful and which they do not. A cookie in no way gives us access to their computer or any information about them, other than the data they choose to share with us.

IFL may use traffic log cookies to identify which pages are being used. This helps us analyse data about web page traffic and improve our website in order to tailor it to visitor needs. We only use this information for statistical analysis purposes and then the data is removed from the system.

Visitors can choose to accept or decline cookies. Most web browsers automatically accept cookies, but users can usually modify their browser setting to decline cookies if they prefer. This may prevent visitors from taking full advantage of the website.

We may also collect and store information about a visitor's browsing device, including, where available, their IP address, operating system and browser type. This is anonymous statistical data about browsing activities and patterns and does not contain any personal data.

IFL's website may contain links to other websites of interest. However, once a visitor has used these links to leave our site, they should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which they provide whilst visiting such sites and such sites are not governed by this privacy policy. Visitors should exercise caution and look at the privacy policy applicable to the website in question.

11. Rights to control your information

IFL is committed to accommodating your rights under the General Data Protection Regulation, which include:

- Your **right to be fully informed** on how your information is processed by IFL. If you have any questions about the guidance provided in this policy notice, or would like further detail on specific sections, then please address your query to the contact details provided.
- Your **right to access** the personal information IFL has recorded about you. If you require a copy of the personal data IFL has recorded about you, please make this request using the contact details provided in this notice and the information will be provided to you in an electronic format as soon as possible, within one month at the latest. We will need to confirm your identity to provide this information.
- Your **right to rectify** the personal information IFL has recorded about you if it is inaccurate or incomplete. If you believe that any of the information we are holding on you is inaccurate or incomplete, please contact us as soon as possible using the contact details provided. We will promptly correct any information found to be incorrect.
- Your **right to erase** the personal information IFL has recorded about you. You may request the deletion or removal of the personal data IFL has recorded about you where there is no compelling reason for it to be kept. We may need to retain some specific information recorded at the volunteer application stage and during any voluntary activities with IFL - for examples, see section: "How we store, maintain and keep this information".
- Your **right to restrict or object** to the further use or 'processing' of your personal information by IFL. Please use the contact details provided to inform us of any wish to restrict or object to the further use of your personal information. Note that we may need to retain some specific identifying information in order to respect your restriction or objection in future. To contact us in relation to any of the information contained in this policy notice, to make a complaint, or to pursue any of your rights under the General Data Protection Regulation, please email help@actiontutoring.org.uk; or alternatively contact our CEO at emma@innnovationsforlearning.org

Change Record

Date of Change:	Changed By:	Comments:
July 2018		Policy approved by the Trustee Board