



## PRIVACY NOTICE

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### Introduction

At ThemPra Social Pedagogy Community Interest we are committed to transparency and to complying with our responsibilities under data protection legislation, most notably the EU 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 or organisation unlawfully. This privacy notice sets out important information regarding how we will use your information and what your rights are under the legislation. It is important that you read this notice prior to providing your information.

### What are the principles of data protection?

When we process your personal data we do so in accordance with the principles set out in the GDPR.

Article 5 requires that personal data shall be:

- a) *processed lawfully, fairly and in a transparent manner in relation to individuals;*
- b) *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;*
- c) *adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;*
- d) *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;*
- e) *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; and*
- f) *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.*

### What is our legal basis for processing personal data?

ThemPra processes personal data on a lawful basis where at least one of the following applies:

- a) *Consent: You have given clear consent for us to process your personal data for a specific purpose, such as to register for an event we offer or sign up to our mailing list.*
- b) *Contract: We need to process your personal data to fulfil a contract we have with you, or because you have asked us to take specific steps before entering into a contract, such as submitting an application form for a course or qualification we offer or requesting access to our Moodle Virtual Learning Environment.*
- c) *Legal obligation: The processing is necessary for us to comply with the law (not including contractual obligations).*
- d) *Vital interests: The processing is necessary to protect someone's life.*
- e) *Public task: The processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.*
- f) *Legitimate interests: The processing is necessary for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal data which overrides those legitimate interests. As a social enterprise our legitimate interests include both commercial and wider societal aspects through the development of social pedagogy.*

## What types of personal data do we process?

We process the following types of personal data:

- ▲ Names, contact details and occupational details of subscribers to our mailing lists and the *International Journal of Social Pedagogy*;
- ▲ Names, contact details and occupational details of learners on our courses – this may occasionally include sensitive personal data about a learner (e.g. health, ethnicity, and additional support-related information);
- ▲ Names, contact details, date of birth, gender, employment and education history, statements of support and sometimes personal circumstances of applicants and learners on our qualifications – this may occasionally include sensitive personal data about a learner (e.g. health, ethnicity, and additional support-related information);
- ▲ Assignments and our assessments of these where these form part of a course or qualification;
- ▲ Personnel and payroll records for employees, contact details, employment history, CPD records and financial data relating to our associates.

## Why do we collect and use your personal data?

We process personal data for the purpose of providing you with the best learning experience we can.

Specifically, this includes the following purposes:

- ▲ To provide information about social pedagogy, our courses, qualifications, consultancy services, events and other activities we provide as well as other information we think you may find helpful given your interest in social pedagogy;
- ▲ To register learners on our qualifications with the awarding organisation, Crossfields Institute, and perform related tasks;
- ▲ To organise SPDN events and other events which you may have signed up to;
- ▲ To undertake assessment-related tasks for learners on our courses and qualifications;
- ▲ To process manuscripts submitted to the *International Journal of Social Pedagogy* in accordance with its editorial protocols;

- ▲ To provide access to our Virtual Learning Environment;
- ▲ To respond to enquiries;
- ▲ To target geographical regions and specific occupational groups for courses we provide or events we organise;
- ▲ To manage, train, support and pay our employees and associates.

## Who do we share your personal data with?

We only share your personal data in the following circumstances:

- ▲ For learners on our courses, personal data may be shared with their current employers or project partners (we only share sensitive personal information with your explicit consent);
- ▲ For learners on our qualifications, personal data will be shared with the awarding organisation (Crossfield Institute) and the external quality assurer as well as partners involved in the *Scaling up Social Pedagogy* project;
- ▲ For members of the Social Pedagogy Development Network, personal data may be shared with partners involved in organising SPDN events (we do not share your contact details);
- ▲ For authors and readers of the *International Journal of Social Pedagogy*, personal data will be shared with the publisher UCL Press, editorial board members and peer reviewers in accordance with our editorial protocols;

## What safeguards are there for transfers to third countries?

We store your personal data on secure servers, password-protected devices or in a lockable file cabinet with restricted access. Where secure servers are located outside EU countries, we ensure that the service providers have in place all necessary security measures required under the GDPR and industry codes of practice. We also ensure that partner organisations we may share your personal data with are legally required to be fully compliant with the GDPR requirements or have comparable data protection standards and safeguards.

## What rights do you have?

As the data subject, you have the following rights in accordance with the GDPR:

### THE RIGHT TO BE INFORMED

You can access our Privacy Notice and Data Protection Policy before agreeing to share your personal data with us. Both resources are available on our website and referred to in any booking forms.

### THE RIGHT OF ACCESS TO PERSONAL INFORMATION

We're happy to provide you with details about how we process your personal data and give you access to it.

### THE RIGHT TO REQUEST RECTIFICATION

You can ask us to rectify the personal data we hold about you.

### THE RIGHT TO BE FORGOTTEN

If you do not wish for us to keep your personal data, you can ask us to erase any information we hold about you. We can only refuse to do this in specific circumstances.

**THE RIGHT TO RESTRICT PROCESSING**

In some cases, we share some of your personal data with partner organisations that may use the data for collaboration on projects. You are allowed to restrict this processing of data where you feel it is inaccurate, or if you object to the basis on which we are processing it.

**THE RIGHT TO DATA PORTABILITY**

We can send you any personal data we hold in a format that allows you to obtain and reuse your personal data for your own purposes across different services.

**THE RIGHT TO OBJECT TO PROCESSING**

You may object at any time to how we process your personal data and can withdraw your consent.

For further information about data protection and your rights, please visit the Information Commission's Office website: <https://ico.org.uk>

**How long do we retain personal data?**

When processing personal data for any purpose we are committed to not keeping these any longer than necessary. The following table outlines the category of data, where data are stored, the retention period and the criteria we have applied to determine the retention period.

Category of data	Storage location	Retention period	Criteria used to determine retention period
<b>SPDN member details</b>	Mailchimp, secure cloud drive	SPDN member personal data will be kept on MailChimp mailing list until the individual unsubscribes from mailing list.	SPDN members wish to stay informed about social pedagogy and SPDN activities. They are free to unsubscribe at any time via the link provided in each email.
	Eventbrite, secure cloud drive	Name and organisational affiliation of previous SPDN event participants will be kept until the individual asks us to remove these.	We keep a record of who has attended which event.
<b>Employer details</b>	Secure cloud drive	Until the request not to receive updates	Employers return to our service, often with long gaps in between. Requests to be removed from our mailing lists are enacted as soon as practicable.

<b>ThemPra newsletter subscriber details</b>	Mailchimp, secure cloud drive	ThemPra newsletter subscribers' personal data will be kept on MailChimp mailing list until the individual unsubscribes from mailing list.	Subscribers wish to stay informed about social pedagogy and our activities. They are free to unsubscribe at any time via the link provided in each email.
<b>Course participant details</b>	Secure cloud drive	Name and organisational affiliation indefinitely or until participant asks to have his records deleted, email addresses for the duration of the course / project	To keep an accurate record of who we have trained, which may be required later on for fast-track route into our qualifications.
<b>Qualification learner application forms</b>	Secure cloud drive and locked filing cabinet for paper forms	For the duration of the qualification, usually 9 months.	We may need to contact the learner or make specific arrangements for them. Beyond the qualification, information supplied on the application form is no longer required.
<b>Individual qualification learner details (names, date of birth, gender, unique learner number)</b>	Secure cloud drive and Mercury (management information system used by our awarding organisation)	Indefinitely, unless requested to remove	Required by our awarding organisation
<b>Qualification learner assignments, reasonable adjustment and special consideration agreements</b>	Secure cloud drive	Until learners have been issued with their qualification certificates and External Quality Assurer has reviewed all evidence.	In order to be able to respond to any appeals, our awarding organisation requires us to retain this until all quality assurance procedures have been satisfactorily completed.
<b>Assessment &amp; monitoring records - EQA Reports, IQA Reports, As-</b>	Secure cloud drive	3 years	This is held by our awarding organisation as it may be required for audit by Ofqual (the

<b>assessment feedback, Attendance/Notes from meetings</b>			regulator). The only personal data should be names and signatures.
<b>Employment applicants</b>	Secure server and locked filing cabinet for paper records	6 weeks after applications close	We retain applications for a short period of time, and may ask to retain them for longer if an applicant wishes to be contacted in relation to future employment opportunities
<b>Employee and third party records</b>	Secure server and locked filing cabinet for paper records	7 years from the end of employment or contract	Records held in order to be able to respond meaningfully to employment reference requests or to respond to HMRC requests
<b>Special Category data (sensitive data – e.g. medical records, ethnicity, disabilities, etc)</b>	Secure server – restricted access to data controller and designated data processors	The shortest possible time; context dependent.	We will retain this data in relation to special consideration applications for learners for as long as needed to make a decision. We will retain this in relation to employees for as long as needed to ensure that their health and wellbeing needs at work are met.
<b>Criminal data</b>	Secure server – restricted access to data controller and designated data processors	The shortest possible time; context dependent.	We will retain this data for as short as possible a time, due to its sensitive nature. The only likely context for us to require this data is when a DBS check is required for employees or third party suppliers

## How can you contact us?

ThemPra Social Pedagogy is a data controller under data protection legislation. If you have any queries about how we process your personal data or this policy, please contact ThemPra's Data Protection Officer at [dataprotection@thempra.org.uk](mailto:dataprotection@thempra.org.uk).



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