



**Institute for Learning Data Code**

**(Version 1.3, 10 August 2009)**

## List of contents

Section A	The nature of the data we process	p.3
Section B	The purposes for which the data are intended to be processed	p.4
Section C	Information to be provided to data subjects	p.4
Section D	Supply of data to third parties	p.4
Section E	Length of time data will be kept	p.5
Section F	Data sources	p.6
Section G	Supply of data to non-European Economic Area countries	p.6
Section H	Sensitive personal data	p.6
Section I	The Data Controller	p.7

The Institute for Learning (IfL) is committed to following the law and the spirit of data protection at all times to ensure your details are secure in line with industry standards for professional and membership bodies.

	<h2 style="text-align: center;"><i>Protecting personal data – IfL’s Data Code</i></h2>
	<p>Institute for Learning is registered with the United Kingdom’s Information Commissioner under the Data Protection Acts.</p> <p>Under these Acts, IfL must process fairly all the personal data we hold. IfL’s Data Code tells you how we do this. It covers anyone who is a Fellow, Member, Affiliate, Associate or Honorary member (including QTLS &amp; ATLS) of IfL. (‘you’, ‘your’, ‘Member’ or ‘Fellow’) and, where appropriate, covers members who have commenced the joining process, past members, customers (e.g. purchasers of mail-order merchandise or people who hire services, meeting rooms, facilities), sponsors, contractors &amp; consultants, and staff.</p> <p>The Acts use the term ‘data subject’ to describe someone whose personal data is processed, and the term ‘processed’ to indicate both the storage of data &amp; any use to which it might be put. ‘Data’ includes paper-based data as well as that processed using computer technologies.</p>
<p><i>A The nature of the data we process</i></p> <p><i>IfL treats all information that you provide us with as confidential at all times.</i></p>	<p>IfL processes the following types of data:</p> <ol style="list-style-type: none"> <li>1) Historical information: information provided by you including if you are an Affiliate, Associate Member, Fellow, or Honorary Member. (including ATLS and QTLS)</li> <li>2) Contact details: your title, full names, designatory letters after your name, job title, employment or contract type, employer, office &amp; home addresses, telephone &amp; fax numbers, email &amp; website addresses;</li> <li>3) Your professional standing: information you give us or information provided to us which may effect your professional standing.</li> <li>4) Other personal data: your date of birth, gender, educational qualifications together with dates and institutions, any national honors you hold, your membership of other bodies including directorships, trusteeships – according to what information you have shared with IfL.</li> <li>5) Your interests: information you give us on your areas of expertise &amp; your interests;</li> <li>6) Financial data: information you give us relating to subscription &amp; other payments to IfL, plus information generated by us, your bankers and other related agencies to record payments, dates, reminders, covenants, direct debits or standing orders to IfL, credit cards, bank details &amp; other related transactions within IfL.</li> <li>7) Activity data: Information pertaining to continuing professional development (CPD) declarations, the events to which IfL has invited you for and your attendance; elections in which you’ve been invited to vote (but not the votes you have cast); your membership of or involvement with IfL Council, IfL committees, IfL working parties and other IfL groups and</li> </ol>

Registered Office: Institute for Learning (Post Compulsory Education and Training) First Floor, 49-51 East Road, Old Street, London N1 6AH

Company Limited by Guarantee Registered in England and Wales No. 4346361

0844 815 3202

[enquiries@ifl.ac.uk](mailto:enquiries@ifl.ac.uk)

[www.ifl.ac.uk](http://www.ifl.ac.uk)

	<p>any IfL offices you might hold;</p> <p>8) Commercial data: information including IfL related financial data about bookings and purchases related to IfL's activities – e.g. room-hire and catering or IfL provided products or services.</p> <p>9) Research data: information taken from company accounts and other publicly available sources; and personnel data: information supplied by and about the people we employ or have employed, and those who have applied for employment.</p>
--	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

**B** *The purposes for which the data are intended to be processed*

IfL processes your data for these purposes:

- 1) to ascertain your grade or grading potential for IfL membership or confirm professional standing, based on your category of experience and relevant qualifications.
- 2) to ensure that IfL publications/newsletters and other information about IfL are sent to you;
- 3) to create, monitor and support ongoing CPD professional practice, including CPD.
- 4) to produce invitation lists to IfL events or related activities;
- 5) to otherwise pass on – where you have given your express consent – contact details & interests to other members or organisations;
- 6) to send you information about our commercial activities, which include the sale and supply of merchandise, room-hire and associated catering, etc;
- 7) to answer a legitimate enquiry as to whether or not you are in membership of IfL; This includes employers as detailed in section D5.
- 8) to use your information – where you have given your express consent – to publicise our work and programmes;
- 9) to ensure that the correct subscription fees, payments and information are requested from you at the correct time;
- 10) to record your payments of subscription fees, invoices, etc;
- 11) to enable the production of management & audited accounts, research & surveys, statistical and other analyses so that the Institute can be managed more efficiently and give voice to teachers and trainers.
- 12) to recover tax from the Inland Revenue against any covenants made by you;
- 13) to target sponsorship and fundraising requests;
- 14) to provide materials for historical research
- 15) to manage our personnel in a fair, efficient, and effective way;

**C** *Information to be provided to data subjects*

Every year that you are in membership at any level, IfL will make available to you a copy of your contact details, other personal data and your interests, and we will invite you to make changes or corrections. These details will normally be available in the *My Pages* area of the *Members' Pages* on IfL website during standard operating times.

In addition, anyone has the right at any time to see a copy of *all* the data that IfL holds about them. You should send a written request together with a

cheque for £10 payable to 'The Institute for Learning, to:

The Data Controller, Member Services, IfL, First Floor, 49-51 East Road, Old Street. London, N1 6AH

*D Supply of data to 3rd parties*

IfL does not sell personal data.

IfL reserves the right to make personal data available to third parties **only**;

- 1) where you have given your express consent (e.g., for your contact details, interests & other material to appear in any *Directory of Members*, whether electronic or printed; or for your contact details and your interests to be passed to others to enable the formation of special interest groups);
- 2) for purposes which you authorised permission for during online registration and acceptance of the terms of membership.
- 3) where you are based overseas (see (G), below);
- 4) where it is necessary to fulfill our obligations to you (for example, when your name & address are given to a mailing house so that Company Notices, IfL communications can be dispatched to you; or when IfL's auditors need access to personal data to compile accounts, ensure probity or otherwise; or when your name & address and details of an order for goods or services are passed on to the contractor who is fulfilling that order; or to invite you to participate in events or activities related to the work of IfL);
- 5) to answer an enquiry, from a legitimate source, as to whether or not you are in membership of the Institute – when we will confirm whether or not you are currently in membership Usually this is to employers on request and when a nominated senior lead for that organisation has been established. Ordinarily this will relate only to the employer you recorded as part of your registration or updated by you during membership of IfL.
- 6) where IfL employs a contractor to reconfigure, upgrade or renew our software or hardware systems;
- 7) where it is necessary to comply with an order from a statutory body which is empowered to require us to release your data; and
- 8) in the case of IfL staff, to supply references and other data on request.

In all these cases, only sufficient data will be released to enable the third party to carry out the purpose for which the data is released; and, except under (5), (7) & (8), the data will be released under a contract that prohibits the third party from using, copying or retaining your data beyond the purpose for which it has been released. In some instances, you will be offered the opportunity to 'opt-in' to a contractor's mailing list: your information will never automatically be offered to such a contractor or placed on such a mailing list.

*E Length of time data will be kept*

- 1) Data on a data subject who is or has been a member may be kept & processed indefinitely for historical purposes. *Application for Membership* forms, web form submissions and other application or updating data (but not financial data) and minutes and transactions will be copied & stored indefinitely on secure servers, compact data disc or a similar storage

Registered Office: Institute for Learning (Post Compulsory Education and Training) First Floor, 49-51 East Road, Old Street, London N1 6AH

Company Limited by Guarantee Registered in England and Wales No. 4346361

0844 815 3202

[enquiries@ifl.ac.uk](mailto:enquiries@ifl.ac.uk)

[www.ifl.ac.uk](http://www.ifl.ac.uk)

media: this data may be placed in IfL's secure archives and may, be made available for purposes of research, history and statistical analysis;

- 2) Other than the data identified in (E1), data on a data subject who has resigned from membership may be edited to ensure that only data necessary for historical purposes is processed, except where *either* a data subject owes outstanding subscriptions or other monies, in which case a record of that debt will also be retained & processed; *or* where the data subject has received a sanction from IfL, in which case a record of that decision & the reasons for it will be kept & processed. Financial data on a data subject who has resigned will normally be held for up to 7 years in accordance with law for auditing or to comply with Inland Revenue or Customs & Excise rules and will be kept only for as long as it is required;
- 3) Data on a data subject who has purchased commercial services (e.g. merchandise, or room-hire and associated catering) will normally be kept and processed for six years before being deleted/anonymised. This data is required for auditing, or to comply with Inland Revenue or Customs & Excise rules;
- 4) Data on a data subject who is otherwise involved with IfL will be kept for a period of time commensurate with the purpose for which the data is kept: for example, data on someone who has made a substantial contribution to the work of IfL and will be kept indefinitely;
- 5) Data on employees or past employees will be kept & processed indefinitely.

#### F Data sources

- 1) Data on members consists of the data identified in (Section A) by you (e.g., on an *Application for membership* form or web form) or your agents (e.g. reference numbers or other data supplied by the Inland Revenue or your bank), plus any other data generated by us as part of processing (e.g., records of payments or invitations to events). Paper and electronic copies of any correspondence with you may also be kept; and
- 2) Data on other data subjects consists of the data supplied by you, together with data supplied by third parties (e.g., in the case of staff, references from previous employers).

#### G Supply of data to non-European Economic Area countries

Data subjects who give addresses in countries or territories outside the European Economic Area (EEA) and whose data is therefore believed to originate in that country, will have their data sent outside the EEA in the following cases:

- 1) for a data subject who gives an address in any other country outside the EEA, their personal data *other* than financial data will be sent to the persons – normally in that country – who are our nominated representatives. This data is sent under a contract, which specifies how the data must be used, and prohibits these representatives from releasing the data to any third Parties without the prior express consent of IfL's Data Controller.

#### H Sensitive personal data

IfL processes 'sensitive personal data' on your membership of other organisations or affiliations only where you have supplied this data or it has been supplied by an external agency and is relevant to your membership of IfL.

Registered Office: Institute for Learning (Post Compulsory Education and Training) First Floor, 49-51 East Road, Old Street, London N1 6AH

Company Limited by Guarantee Registered in England and Wales No. 4346361

0844 815 3202

[enquiries@ifl.ac.uk](mailto:enquiries@ifl.ac.uk)

[www.ifl.ac.uk](http://www.ifl.ac.uk)

IfL also processes 'sensitive personal data', e.g. disability and your racial or ethnic group where you have supplied this data: this data is used solely for equality monitoring and promotion purposes to enable us to ensure that we are not discriminating against people from any demographic group. Please see our diversity statement on the IfL website.

IfL processes 'sensitive personal data' on criminal convictions only where:

- 1) a criminal conviction is the reason for any sanction imposed by IfL.
- 2) an employee has 'unspent' criminal convictions, when a record of this information is kept in their confidential personnel files;

We do not process data on any other criminal proceedings or allegations.

IfL may explicitly request that you supply information from the other categories of 'sensitive personal data' where these are directly necessary to fulfill a particular purpose. We will only process data in these categories where we have your explicit consent, and this data will always be deleted as soon as the purpose for which it was collected is fulfilled.

IfL does not generally process any other sensitive personal data although in some instances it may be possible to make inferences from other data you have supplied to us or that you have supplied to others for the public domain (for example, your membership of certain bodies, or your job title or employer).

#### *I Data Controller*

The Data Controller named as nominated to be responsible for our compliance with the Data Protection Acts (see also section (C), above) is:

The Institute for Learning, First Floor, 49-51 East Road, Old Street. London, N1 6AH

#### **IfL STATEMENT**

IfL is committed to following the spirit of the Data Protection Acts as well as obeying the letter of them. Your comments & views are welcome.

You can obtain any further information or make enquiries to the Data Services Manager or Membership Manager at any time by calling 0844 815 3202 or emailing [enquiries@ifl.ac.uk](mailto:enquiries@ifl.ac.uk)

Version 1.3 – 10 August 2009