

# ARLT Privacy Policy

## version 1 – May 2018

The ARLT is committed to protecting your personal information and making sure that your personal data is processed in a fair, open, transparent and secure manner.

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#### 1. Definitions used in this Policy

'We/Us' – the ARLT.

'You' – the Member.

'Member' – delegates are deemed to become Members of the ARLT through attendance at a one day spring Refresher Day or Summer School residential INSET event.

'Data Subject' – Member, Delegate, OG Leader, Committee Member, Officer, Vice President.

'Processing' – any operation or set of operations performed on Personal Data or sets of Personal Data.

'destroyed' – paper copy, shredded or burned.

'deleted' – digital copy, digitally and securely erased.

#### 2. Data protection principles

We undertake to follow the data protection principles below:

- Processing is lawful, fair, transparent. Our processing activities have lawful grounds. We always consider your rights before processing personal data. We will provide you with information regarding Processing upon request.
- Processing is limited to the given purpose. Our Processing activities are in line with the purpose for which the Personal Data was gathered.
- Processing is done with minimal data. We only gather and process the minimal amount of personal data required for any purpose.
- Processing is limited with a time period. We will not store your personal data for longer than needed.
- We will do our best to ensure the accuracy of data.
- We will do our best to ensure the integrity and confidentiality of data.

### 3. Data Subject's rights

The Data Subject has the following rights:

- i) Right to information – meaning you have the right to know whether your Personal Data is being processed; what data is gathered, from where it is obtained and why and by whom it is processed.
- ii) Right to access – meaning you have the right to access the data collected from/about you. This includes your right to request and obtain a copy of your Personal Data gathered.
- iii) Right to rectification – meaning you have the right to request rectification or erasure of your Personal Data that is inaccurate or incomplete.
- iv) Right to erasure – meaning in certain circumstances you can request for your Personal Data to be erased from our records.
- v) Right to restrict processing – meaning where certain conditions apply, you have the right to restrict the Processing of your Personal Data.
- vi) Right to object to processing – meaning in certain cases you have the right to object to Processing of your Personal Data, for example in the case of direct marketing.
- vii) Right to object to automated processing – meaning you have the right to object to automated processing, including profiling; and not to be subject to a decision based solely on automated processing. This right you can exercise whenever there is an outcome of the profiling that produces legal effects concerning or significantly affecting you.
- viii) Right to data portability – you have the right to obtain your Personal Data in a machine-readable format or, if it is feasible, as a direct transfer from one Processor to another.
- ix) Right to lodge a complaint – in the event that we refuse your request under the Rights of Access, we will provide you with a reason as to why. If you are not satisfied with the way your request has been handled, please contact us.
- x) Right for the help of the **supervisory authority** – meaning you have the right for the help of a supervisory authority and the right for other legal remedies such as claiming damages.
- xi) Right to withdraw consent – you have the right to withdraw any given consent for processing of your Personal Data.

### 4. The personal data we collect about you and how we collect it

#### i) **ARLT Delegates / Members**

When delegates make a booking to attend an ARLT INSET event they provide the Director (single Refresher Day INSET) or Summer School Secretary with their name and some or all of the following contact details:

- Home address
  - Home phone number
  - Mobile phone number
  - Home email address
- and/or*
- School name
  - School email address
  - dietary requirements and other details as appropriate to a residential course

Delegates are required to supply additional information regarding their status if they wish to apply for a bursary on the grounds of being a PGCE student, self-funded, low income,

retired, no budget or other. Further details related to status are provided directly to the Hon. Treasurer when making a bursary request.

There is a tick box on Summer School booking forms for delegates to indicate whether they consent to their details being shared with other delegates at the same Summer School. There is now an additional option for delegates to indicate their consent for the ARLT to retain their data in order to contact them with information about future ARLT events – see item 5. below.

The personal data for item 4.i) is collected either via a paper or digital copy of the relevant booking form / leaflet, sent either by post or email.

ii) **Registrations for ARLT online Teachers Resources**

When teachers register on the ARLT website for access to the online Teachers Resources they provide:

- First name
- Surname
- Preferred email contact address
- School / College / University name and web address (or, if not currently teaching, their present circumstances)

This data is sent via email to the Webmaster.

iii) **Option Group Coordinator and volunteers for OG Leader**

The Option Group Coordinator collates and retains a list of volunteers as OG Leaders. Volunteers sign against their name on the list as an indication of their consent for their personal data to be stored and used by the OG Coordinator for the purpose of planning a schedule of Option Groups for ARLT INSET events.

This data is collected on paper for the stated purpose as notified to the prospective OG Leader with their written consent.

iv) **Antiquities Resources loans**

The loan of any box from the ARLT antiquities collection the Antiquities Resources Curator collects relevant personal data from the borrower for information and insurance purposes. The data is collected on a paper form, requiring a signature as consent to the conditions of the loan and the retention of the data for the given purpose and for the requisite duration as necessary for the loan and for insurance purposes.

**5. How we use and store your personal data**

We process your Personal Data in order to fulfil our obligation rising from law and / or use your Personal Data for options provided by law. We reserve the right to anonymise Personal Data gathered and to use any such data. We will use data outside the scope of this Policy only when it is anonymised.

We use your Personal Data in order to provide our service to you on the following grounds:

i) **ARLT Delegates / Members**

- a) The RD Director or Summer School Secretary uses the data provided on booking to correspond as necessary with delegates prior to the booked INSET event in order to facilitate delegates' attendance at the event.

- b) The RD Director or Summer School Secretary might contact delegates during an event in order to facilitate the smooth running of the event and the attendance of the delegates / members.
  - c) The RD Director and Summer School Secretary create and retain securely a digital copy of the Personal Data collected and used in the course of carrying out their duties, which they pass to the Hon. Secretary. The data is then **destroyed / deleted**, i.e. paper copies are shredded or burned and local digital copies are deleted on completion of the relevant event.
  - d) The Hon. Secretary might contact delegates during an event in order to notify them of meetings and other issues as relevant and appropriate to their responsibilities as Hon. Sec. and as relevant and appropriate to the delegates' attendance at a whole day or residential INSET event.
  - e) The Hon. Secretary (currently) uses the Personal Data held about Members (former INSET delegates) who have given their consent (see 4.i) above) to send email notifications of future ARLT INSET events.
  - f) The Hon. Secretary (currently) retains the *name only* of former INSET delegates to maintain statistical records of attendance for monitoring purposes only.
- ii) **Registrations for ARLT online Teachers Resources**  
 The ARLT Webmaster *only* uses the data of those who register or re-register for access to the ARLT online Teachers Resources for the following purposes:
- a) to verify their status as a teacher
  - b) to provide them with a password to gain access to the Resources
  - c) to provide reminders of the password.

All registered users are required to contact the Webmaster via email to re-register in order to regain access to the resources with the new password.

On registering / re-registering teachers must indicate their acceptance of the terms of the ARLT Privacy Policy which is available for viewing from both the Registration and Login pages.

The data is retained securely on paper and as a digital copy by the Webmaster only while the registration is established, after which time the data is permanently destroyed / deleted.

iii) **Option Group Coordinator and volunteers for OG Leader**

The OG Coordinator uses the data collected from volunteers in order to coordinate Option Group programmes for Refresher Day and Summer School INSET in liaison with the relevant event Director(s).

This data is stored securely on paper and as a digital copy and used by the OG Coordinator only for the stated purpose as notified to the prospective OG Leader with their written consent.

The data may be retained for as long as the volunteer wishes to remain on the list as an OG Leader so that they might be contacted in this regard.

The data is destroyed / deleted by the OG Coordinator when the Data Subject no longer wishes to remain on the list as an OG leader and / or on request.

iv) **Antiquities Resources loans**

The relevant personal data collected by the Antiquities Resources Curator for information and insurance purposes on the loan of any Antiquities is retained on paper / as a digital copy for the requisite duration as necessary for the loan **and** for insurance purposes, upon the expiry of which duration it is destroyed / deleted.

The data will only be used by the Antiquities Resources Curator if circumstances require correspondence with the borrower, contact with the insurers or communication with the ARLT Committee and / or Officers.

v) **Hon. Secretary and ARLT President, Officers, Committee Members and Vice Presidents**

The Hon. Secretary maintains a digital database of ARLT Committee Members, Officers and Vice Presidents. Their personal data is used to notify them, mostly via email, of information and documentation related to ARLT Committee business.

vi) **Hon. Treasurer and ARLT President, Officers, Committee Members and Vice Presidents**

The Hon. Treasurer retains a list on paper of the ARLT President, Officers, Committee Members and Vice Presidents. This is retained for the duration required by the Charity Commission (see 6.i) a) below).

We might process your Personal Data for additional purposes that are not mentioned here, but that are compatible with the original purpose for which the data was gathered. To do this, we will ensure that:

- the link between the purposes, context and nature of Personal Data is suitable for further processing;
- the further processing would not harm your interests;
- there would be appropriate safeguards for processing;
- we will inform you of any further processing and purposes.

## 6. Sharing your personal data

We undertake to share the personal data of ARLT Members **only** in the circumstances given below:

i) **ARLT Committee Members, Officers, Vice Presidents and President**

- a) The name, address, telephone number and email address of Committee Members are notified annually by the Hon. Treasurer to the Charity Commission. New Committee Members are notified of this and their consent obtained when they provide their details for the Hon. Treasurer on election at Summer School.

The names of trustees only, not their contact details, are available to members of the public when they consult the Charity Commission website. Only the ARLT named contact's address and contact details are given. The named contact is usually and currently the Hon. Treasurer.

b) Personal data listed on the ARLT website, Officers page:  
<http://www.arlt.co.uk/officers.html> as follows:

- Name and teaching establishment (if applicable) of Officers and Committee Members.
- Name only of VPs and past Presidents.
- Photographs of Officers and past Presidents.

## 7. Keeping your data secure

We undertake to keep your Personal Data that is stored on paper secured under lock and key.

We undertake to keep your digital Personal Data secured with protections such as passwords and encryption. We use safe protocols for communication and transferring data (such as HTTPS). We use anonymising and pseudonymising where suitable. We monitor our systems for possible vulnerabilities and attacks.

We destroy (see 1. above) paper copies of data collected once a digital copy has been created and securely stored for our records as detailed above, if consent has not been obtained to retain it and / or on request.

We delete (see 1. above) digital copies of data once the stated use ends, if consent has not been obtained to retain it and / or on request.

Even though we endeavour to do our best we cannot always guarantee the security of information, however, we promise to notify suitable authorities of any data breaches. We will also notify you if there is a threat to your rights or interests. We will do everything we reasonably can to prevent security breaches and to assist authorities should any breaches occur.

If you have registered to use the ARLT online Teacher Resources, please note that you must undertake to keep your username and password secret and secure.

## 8. Cookies

We do not set cookies on your computer when you access the ARLT website or online Teachers Resources.

## 9. Children

We do not knowingly collect or intend to collect information from children. We do not target children with our services.

## 10. Contact information

If you have any queries regarding this Privacy Policy or the ARLT's collection, storage and use of your Personal Data, please contact the ARLT Hon. Secretary on [arltsec@yahoo.com](mailto:arltsec@yahoo.com).

For information regarding the General Data Protection Regulation and other Data Protection legislation, please contact the **Supervisory Authority** for Data protection regulations:  
Email: [info@dataprotection.ie](mailto:info@dataprotection.ie)  
Phone: +353 57 868 4800

## 11. Further information

For further information please see the ICO (Information Commissioner's Office) website:  
<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/>

## **12. Changes to this Privacy Policy**

We may amend this Privacy Policy from time to time to ensure that it remains accurate, up-to-date and compliant with all relevant legislation and regulations in a timely manner and as appropriate and continues to reflect how and why we use your personal data.

This Policy was approved by the Officers of the ARLT in May 2018 and will be reviewed no later than 2021.

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