



Innovations for Learning: TutorMate Privacy & Data Protocols for Volunteer Tutors

These protocols set out how Innovations for Learning (IFL) uses and protects any information that you provide to 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 these protocols.

IFL keeps its policies and protocols under review, and they may change this policy from time to time. The current version of this policy document is effective from October 2020.

1. IFL Contact information

To contact us in relation to any of the information contained in this document or in respect of any data protection matter, please email help@tutormate.org.

2. The Data Protection Principles

IFL applies the Seven Data Protection Principles when processing personal data:

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.

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

Organizations 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; and/or
- IFL has a legal obligation to process data.

4. The information we record and use

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

- name and organization;

- 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 background check status including the issue date, certificate number and a copy of your certificate where relevant (see section on 'How we process and use background 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; students you have worked with and their reading progress.
- IFL Voice recordings: for the safety and protection of our volunteers and students, all IFL Voice calls are recorded during the tutoring session.

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 programs;
- analyse and improve our program delivery and impact.

6. Our background check procedure

To meet our responsibilities in relation to child protection and safeguarding, it is necessary for all our volunteer tutors to complete a full background screening, which includes criminal record check.

We subcontract an external online provider (Sterling Talent Solutions in Canada, and Sterling Volunteers in the US), to process our background checks. When you register with us, you receive instructions on how to complete an initial online Sterling application form.

Completing the application will involve providing some of your personal details to Sterling. If your check is clear, we will be able to assign a student to you. If your check 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 background check to a partner school, we are not responsible for the school's adherence to its privacy policies and legal obligations.

7. Our communications with you

IFL may contact you via email, phone or text to provide logistical information to you during your volunteer activities ('core communications'). In addition, when you sign up to tutor, you will be opted-in to receive, periodically via email, 'additional communications' such as those listed below. If you do not wish to receive these, you may opt-out by clicking the unsubscribe link in the communication or by changing your preferences in the TutorMate portal.

- 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.

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 unauthorized access or disclosure, we have put in place physical, electronic and organizational procedures to safeguard and secure data, including:

- the use of a limited access & password protected database and cloud storage solutions (like Google Drive)
- suitable cyber-security safeguards and best practices;
- secure and timely deletion or destruction of any digital or hard-copies of personal data once it is no longer required.

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

Data retention

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.

Please note that information regarding criminal convictions on background checks will be deleted after a decision has been made by IFL on your suitability for a role unless it is held for a longer period with your explicit consent.

Other volunteer information (name, employer, email, phone (if provided)) will be transferred from an 'active' environment (our password protected database) after one year and be retained in a historical archive for up to 5 years for comparison purposes.

Data Storage and Transfer

In order to maintain our services to participants, 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. This includes Innovations For Learning USA (IFL USA), with which data is shared under the protection of a data sharing agreement). We also share an administrative Google Drive account with IFL USA which uses data storage facilities in the USA.

IFL's volunteer database storage is managed by Heroku, which is based in the USA. Heroku is owned by a company called Salesforce which ensures data privacy as explained in its Data Processing Addendum (DPA) and this FAQ document. The basis for these transfers is in Salesforce's approved Processor Binding Corporate Rules.

When you consent to participate in the TutorMate program, the collection, international transfer, storage, and processing of your information will be undertaken in accordance with this Privacy Policy and the Freedom of Information Act (FOIA), the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), and any subsequent or related legislation in force from time to time.

9. Information sharing

IFL may use your information in an aggregated and anonymized 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-student 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

Cookies are required for the use of our web applications. To prevent tracking, users can clear their browser cache at the end of each session.

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 document, 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 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@tutormate.org.
- Your right to complain about the processing of your personal information by IFL. In the US, you can register a complaint with the Federal Trade Commission. In Canada, you can register a complaint about our handling of your personal data with the Office of the Privacy Commissioner. These are the supervisory authorities for data privacy in their respective countries.