



Privacy Notice for Pupils

(Also provided to parents and carers)

Policies can be difficult for children and young adults to understand. You can ask your parents or another adult such as your teacher to help you understand it if you would like to.

This document tells you how we use information about you and what we do with it. We call this information about you 'personal data' or 'personal information.'

Who we are

Schools Partnership Tutors, or SP Tutors as we are otherwise known, is a tutoring agency. We were established to provide quality tutors to schools to help pupils that have been disadvantaged by the Covid-19 lockdown. The Government felt that there would be lots of pupils who found learning at home difficult, for many reasons, and would now need a bit of extra support to catch up with their lost learning. SP Tutors is working alongside your school to make this happen. We are also working alongside the Department for Education's National Tutoring Programme to make sure tutoring is as effective as it can be and we need to collect data about you, your school and your tutor so we can help evaluate its effectiveness – SP Tutors is called the Joint Data Controller.

The postal address of the SP Tutors is Unity SP Offices, Park Road, Haverhill, Suffolk CB9 7YD.

If you want to contact us about your personal information you can contact our Data Protection Officer at dpo@unitysp.co.uk. Alternatively, you can speak to them or you can leave a letter at reception or send one by post.

In this notice, 'we' and 'us' means SP Tutors. 'You', 'data subject' and 'pupils' includes children/young adults who have been tutored, are being tutored and those who will be tutored.

The categories of pupil information that we process include:

- personal identifiers and contacts (such as name, unique pupil number, contact details and address)
- characteristics (such as gender*, ethnicity*, socio-economic status, language and proximity to school)
- safeguarding information
- special educational needs
- attendance (such as sessions attended, number of absences, absence reasons)
- assessment and attainment (such as test results)
- behavioural information



- Information about pupil premium eligibility
- Reasons for programme eligibility and programme participation

We may also use photographs or videos of you during your tutoring sessions, particularly if they are online sessions, including images captured. More details about this are in our combined data protection and freedom of information policy.

Why we collect and use pupil information

The personal data collected is essential, for us to fulfil our official functions and meet legal requirements.

We collect and use pupil information, for the following purposes:

- a) to support your learning
- b) to keep you safe (e.g. safeguarding)
- c) to monitor and report on your progress
- d) to support research related to the National Tutoring Programme aims
- e) to assess the quality of our services
- f) to meet the statutory duties placed on us by the Department for Education (DfE)
- g) to feedback to your teacher, school and/or parent(s)/carer(s) regarding your tuition

Use of your personal data in automated decision-making and profiling

We don't currently put your personal information through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

Our lawful basis for using your personal data

Under the General Data Protection Regulation (EU) 2016/679 (GDPR), the lawful bases we rely on for processing pupil information are:

- for purposes (a), (c), (d) & (f) the legal basis of 'public task': collecting the data is necessary to perform tasks that we are required to perform as part of our statutory function
- for purpose (b) the legal basis of 'vital interests': to keep children safe
- for purpose (e) the legal basis of 'consent': the data subject has given consent to the processing of their personal data for one or more specific purposes
- for purpose (g) the legal basis of 'legal obligation': data collected for DfE census information



- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information) (England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) Regulations 2013

In addition, concerning any special category data:

- In the case of ethnicity and biometric information: condition (a) of GDPR Article 9 (2): the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in GDPR Article 9 (1) may not be lifted by the data subject.

How we collect pupil information

The majority of the personal information we collect about you from your school on our forms is either required legally, or to administer the tuition programme to support your learning, or required by the National Tutoring Programme on behalf of the Department for Education. Please see the [National Tutoring Programme's Privacy Notice](#) and NTP Evaluation Pupil Privacy Notices on SP Tutors' website for more information on why we are collecting data on their behalf.

Where there is no legal requirement to collect your personal information we will explicitly explain why we need it and what the consequences are if it is not provided. One example of this is where we collect an email address for you, the pupil (either your school email, personal email or parent/carer email) so that we can create reminders for upcoming sessions, send praise to you about a recent tutoring session and/or more importantly so you can access all the features of the PupilKnowHow app if/when you are provided with a license.

Any information we collect from your school we ask for in either password protected documents which we recommend are sent via secure file transfer such as WeTransfer or we collect using Microsoft Forms directly onto our server. Tutors may keep information about you for the length of your block(s), to support their tuition delivery and your learning. Tutors are asked to keep this information on our servers and not

When we give your information to others

We will not give information about pupils receiving tuition from us to anyone without your consent unless the law and our policies allow us to do so. If you want to receive a copy of the information we hold about you, please contact our Data Protection Officer via email: dpo@unitysp.co.uk.

Once pupils reach the age of 13, the law requires your school to pass on certain information to the provider of youth support services in their area (the appropriate local authority) which may include information provided by us about your tuition. They have responsibilities in relation to the education or training of 13-19 year olds. Your school may also share certain personal data relating to pupils aged 16 and over with post-16 education and training providers in order to secure appropriate services for them. A parent / guardian can request that **only** their child's name, address and date of birth be passed to the



provider of youth support services in their area by informing the office at their child's school. This right is transferred to the child once they reach the age of 16. For more information about services for young people, please go to your local authority's website.

We are required to share information about our pupils with the Department for Education (DfE) either directly or via the Local Authority for the purpose of data collections, under:

- Section 537A of the Education Act 1996
- the Education Act 1996 s29(3)
- the Education (School Performance Information) (England) Regulations 2007
- regulations 5 and 8 School Information (England) Regulations 2008
- the Education (Pupil Registration) (England) (Amendment) Regulations 2013

All such data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework

To find out more about the pupil information we share with the Department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD). The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

To find out more about the NPD, go to [National pupil database: user guide and supporting information - GOV.UK](#).

The law allows the Department to share pupils' personal data with certain third parties, including:

- schools
- local authorities
- researchers
- organisations connected with promoting the education or wellbeing of children in England
- other government departments and agencies
- organisations fighting or identifying crime

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact DfE: <https://www.gov.uk/contact-dfe>

We share information about your tuition with your school which they may wish to share with your parents or your main carer. Please refer to your school's Pupil Privacy Policy for details of what information they may share about you and to whom.

Whether we transfer your information to another country

All information collected by us is stored on servers located in the UK. If we transfer personal information to a country or territory outside the UK or the European Economic Area, we will do so in accordance with



data protection law.

How long we keep your information

We only keep your information for as long as we need to or for as long as the law requires us to. Most of the information we have about you will be on our database, archived database or in your school file. How long we keep your information for, depends on what the information is for. We have a policy which explains how long we keep information. It is called a records retention policy and you can find it on the SP Tutors' website www.sptutors.co.uk

Your rights

You have these rights:

- You can ask us for a copy of the information we have about you
- You can ask us to correct any information we have about you if you think it is wrong
- You can ask us to erase information about you (although we may have good reasons why we cannot do this)
- You can ask us to limit what we are doing with your information
- You can stop your information being used to send you marketing materials
- You can object to decisions being taken by automated means
- You can object to what we are doing with your information if it is likely to cause, or is causing, damage or distress
- You can ask us to transfer your information to another organisation in a format that makes it easy for them to use.

There is more information in our combined data protection and freedom of information policy, which you can find on the SP Tutors' website.

You can complain about what we do with your personal information. If you are not happy with our answer to your complaint, then you can complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire SK9
5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Report a concern online at <https://ico.org.uk/make-a-complaint/>