



Action Tutoring Privacy Notice for Schools, Pupils, Parents & Guardians

1. About Action Tutoring

Action Tutoring (we, us, our) is a registered education charity, supporting pupils from disadvantaged backgrounds to achieve a meaningful level of academic attainment, with a view to helping them progress to further education, employment or training. We provide high-quality volunteer tutors to work with pupils, increasing their subject knowledge, confidence and study skills.

In secondary schools, Action Tutoring particularly focuses on supporting pupils on the grade 3-4-5 borderline in English and maths. We aim to help them achieve a grade 4 and above in maths and English GCSEs. In primary schools, we aim to help pupils work towards expected standards in maths and reading.

2. Purpose of this privacy notice

The current version of this notice is effective from 15th February, 2022.

This notice intends to make the following points clear to schools, pupils, parents and guardians about the information (data) we ask partner schools to share with us about pupils taking part in our programme and the information we collect independently:

- why we ask our partner schools to share information with us and why we collect some additional information independently (section 3.)
- what information we ask partner schools to share with us and what information we collect independently (section 4.)
- where we store the information and who can access it (section 5.)
- how long we keep the information (section 6.)
- what information we share with other parties (section 7.)
- our legal basis for processing the information (section 8.)
- security of personal information (section 9.)
- transfers outside of the EEA (section 10.)
- how to control your information and rights (section 11.)
- how to contact us (section 12.)

Please note that if a school partners with Action Tutoring as part of the [National Tutoring Programme](#) (NTP), then additional documentation produced by the NTP including privacy notices and other guidance beyond that covered in this notice may be provided to the school and participating pupils and their parents separately. The current National Tutoring Programme privacy notice can be found [here](#).

We have also produced an [Action Tutoring Parent/Guardian Letter](#) for schools who

may wish to distribute this to the parents/guardians of participating pupils, introducing what the Action Tutoring sessions involve, and directing them to this privacy notice. Although pupil participation in the Action Tutoring programme is not reliant on written opt-in consent from a parent or guardian (see section 8. Legal basis), this letter nevertheless provides parents an opportunity to inform their child's school if they do not wish for them to take part in the Action Tutoring sessions, or to inform us if they do not wish for their child's information to be used for evaluation purposes.

3. Data Purpose – *why we ask our partner schools to share information with us and why we collect some additional information independently*

Action Tutoring asks our partner schools to provide information about the pupils they put forward for participation in our tutoring programme, and we collect some additional information independently, for the following reasons:

- to effectively coordinate the delivery of our programme both in-school and online;
- to meet safeguarding responsibilities;
- to enable the evaluation of our impact and improve future programme delivery;
- to demonstrate our programme reaches the pupils who need it as defined by our charity's mission.

4. Data Collection – *what information we ask partner schools to share with us and what information we collect independently*

Before a pupil officially joins our programme, we ask our partner schools to provide us with the following information about all pupils selected to take part, via a password-protected spreadsheet or email encryption software: *full name, school, school year, gender, date of birth, unique pupil number, subject ability, pupil premium status SEND status.*

Optionally, the school may also choose to provide additional engagement-related guidance for our consideration.

During the programme, we will independently record: *pupil attendance and engagement, pupil assessment results, pupil survey responses.*

After a pupil has completed the programme, we may ask our partner schools to provide, via a password-protected spreadsheet or email encryption software: *pupils' final GCSE results in English Language and maths, or final SAT results in reading, writing and maths.*

For pupils who are accessing the tutoring sessions **online**, *video recordings* of tutoring sessions are made. For those pupils accessing the tutoring session online from an **at-home** setting, rather than in school, we may ask the school to indicate if the pupil has access to the necessary IT at home to participate in the sessions, and provide the

following information for a responsible adult such as a parent or guardian: *full name, mobile number, email address, relation to pupil.*

We may also request parent or guardian contact details from our partner schools in order to introduce ourselves to the parents and guardians of Action Tutoring pupils, and to keep them updated on their child's attendance where this is requested or deemed appropriate.

5. Data Storage and Access – where we store the information and who can access it

We operate a central database, [Salesforce](#), to help us securely store pupil and parent/guardian information. The database is password-protected and access to the database is limited to Action Tutoring staff, with 'staff' referring to employees of Action Tutoring and not including our volunteer tutors.

For pupils who are accessing the tutoring sessions **online**, video recordings of tutoring sessions are stored on the online tutoring platform, [Vedamo](#). Access to the platform is password-protected and only Action Tutoring staff can view session video recordings. Some video recordings may be temporarily transferred to an external hard drive by our Online Project Manager.

For pupils who complete assessments or surveys **online**, their names, results and responses may be stored on the webform platform, [FormAssembly](#). The platform is password-protected and access is limited to specific Action Tutoring staff.

Information about pupils and their parents/guardian may also be recorded in other formats, such as in emails, word processing and spreadsheet applications. Information in these formats may be stored on Action Tutoring devices or in Google Workspace applications such as our [Google Drive](#) cloud storage. Access to these devices and cloud applications is password-protected and restricted to Action Tutoring staff.

6. Retention – how long we keep the information

We work to ensure that your personal data is only retained for the period that Action Tutoring needs it for, or in accordance with laws, regulations and professional obligations that we are subject to.

Pupil and parent/guardian records on our central database, Salesforce, containing information provided by our partner schools, alongside additional information we have captured independently, are [pseudonymised](#) approximately two academic years after a pupil graduates from the Action Tutoring programme. This involves removal of all information from a record which could be used to identify an individual pupil or their parent/guardian. This process can only be reversed by specific members of the Action Tutoring team and only under reasonable circumstances, such as to facilitate a safeguarding enquiry.

Video recordings of online tutoring sessions completed on Vedamo are kept for approximately one full academic term after the term in which the session took place.

The names, results and responses of pupils who completed assessments or surveys using the webform platform, FormAssembly, will be archived approximately two academic years after a pupil graduates from the Action Tutoring programme.

Our best practice for any pupil and parent/guardian information temporarily stored in other formats, such as word processing or spreadsheet applications, is to delete this information as soon as the purpose for processing the information in the alternative format is complete.

Pupil records on our central database and any related parent/guardian information are deleted or permanently anonymised 10 years after their Date of Birth, or at an estimated point where Date of Birth information was withheld. The anonymisation process cannot be reversed.

If you would like to find out how long any other information is being retained, please contact us via the details provided in section 12 of this policy.

7. Data sharing – what information we share with other parties

The following information about pupils may be shared with specific tutors before and during the programme to help them tailor their tutoring sessions: *full name, school, school year, gender, subject ability, SEND status, assessment results, attendance and engagement notes, and any other information the pupil's school has voluntarily provided to us which is deemed relevant for the tutor to be made aware of.*

[National Tutoring Programme](#) - the majority of schools which Action Tutoring works with are partnering with us as part of the National Tutoring Programme (NTP), and Action Tutoring will need to share some information about pupils with the NTP; *full name, date of birth, unique pupil number, SEND status, pupil premium status and other circumstances of disadvantage.* The National Tutoring Programme privacy notice can be found [here](#).

Additional documentation produced by the NTP including privacy notices and other guidance beyond that covered in this notice may be provided to you separately.

After a pupil has completed the programme, the following information may be shared with tutors, but only in relation to those pupils they directly supported: *pupils' final GCSE results in English Language and maths, or final SAT results in reading, writing and maths.*

Unless consent is sought, or an agreement of confidentiality is in place, information about pupils or their parents/guardians will not be intentionally shared with other

third parties.

Anonymous and aggregated data relating to pupils may be published on the Action Tutoring website and used in published materials, such as Action Tutoring's annual report for funders.

8. Legal basis – our legal basis for processing the information

To lawfully process the information outlined in this notice, we may rely on:

Legitimate interests: where information we request or collect independently about pupils or their parents/guardians is used to effectively coordinate the delivery of our programme in partnership with schools, enable the evaluation of our impact, improve the future delivery of our programme, and demonstrate that our programme reaches the pupils who need it as defined by our charity's mission.

Examples: pupil full name, subject ability, *pupil premium status*, *unique pupil number*, *exam results*, *survey responses*

Legal obligation: where we may need to use or share information we hold about pupils or their parents/guardians in order to comply with a legal obligation, such as to facilitate the investigation of a safeguarding concern with a local authority.

Consent: in order to facilitate any additional processing of information beyond which is outlined in this privacy notice, we will seek consent from the relevant individuals in order to do so.

Please note that if a school partners with Action Tutoring as part of the [National Tutoring Programme](#), then additional documentation may be provided to the school separately, outlining the legal basis identified by the National Tutoring Programme for collecting and processing certain data. The National Tutoring Programme privacy notice can be found [here](#).

9. Security of personal information

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place a robust access control policy which limits access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have procedures to handle any potential data security breaches. Data subjects, third parties and any applicable regulators will be notified where we are legally required to do so. If you become aware of a potential data breach involving your

personal data, please contact us immediately using the details provided at the end of this notice.

10. Transfers outside of the EEA

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the European Economic Area (EEA).

We may share personal information to third parties outside of the European Economic Area (EEA). Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the EEA to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include Standard Contractual Clauses.

For more information about transfers and safeguarding measures, please contact us using the information in section 12.

11. How to control your information and your rights

Action Tutoring is committed to accommodating [your rights](#) under the General Data Protection Regulation, which include:

- Your **right to be fully informed** on how the information we ask you to share with us and the information we collect independently is processed by Action Tutoring. If you have any questions about the guidance provided in this policy notice, or would like further detail on specific sections, then please address your query to the contact details provided below.
- Your **right to access** the information we have asked you to share with us and the information we collected independently. If you require a copy of this information, please make this request using the contact details provided in this notice 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 information we have asked you to share with us and the information we collected independently if it is inaccurate or incomplete. If you believe that any of the information is inaccurate or incomplete, please contact us as soon as possible using the contact details provided below. We will promptly correct any information found to be incorrect.

- Your **right to erase** the information we have asked you to share with us and the information we collected independently. You may request that this information be placed under restricted access, pseudonymised or deleted where there is no compelling reason for it to be kept. However, we may need to retain some information as stated in section 6. Retention – *how long we keep the information*.
- Your **right to restrict or object** to the further processing of the information we have asked you to share with us and the information we collected independently. Please use the contact details provided to inform us of any wish to restrict or object to the further processing of this information. Note that we may need to retain some key information in order to respect your restriction or objection in future.

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

Where we make an automated decision which has a legal or substantially similar effect, you have the right to speak to us and we may then review the decision, provide a more detailed explanation and assess if the automated decision was made correctly.

12. How to contact us

To contact us in relation to any of the information contained in this policy notice, to make a complaint, to pursue any **rights** under the General Data Protection Regulation and to contact our DPO, please email: hello@actiontutoring.org.uk

Or write to us at: Action Tutoring, The Dock, Tobacco Quay, Wapping Lane, London E1W 2SF

Telephone: 0203 872 5894

If you are unhappy with the way that we have handled your Personal Information, you can make a complaint to the [Information Commissioner's Office \(ICO\)](#) which is the UK authority responsible for data protection.