Tutoring: Code of Conduct & Privacy Notice for Parents and Carers of Pupils

Company name:	Edwin Supply Ltd: Vision for Education Ltd / ABC Teachers Ltd / Smart Teachers Ltd (part of the Edwin Group Ltd)
Document:	Tutoring: Code of Conduct & Privacy Notice for Parents & Carers of Pupils
Topic:	Safeguarding & Data Protection
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1. Why are you receiving this privacy notice?

Your child is participating in tutoring provided by Vision for Education, ABC Teachers and/or Smart Teachers ("Edwin Supply"), which is provided in an out-of-school physical or online setting. Each entity is registered with the Information Commissioner's Office ("**ICO**") to process personal data, and their registration is publicly available on the ICO's website. Occasionally this tutoring can also be delivered in an in-school setting as part of our provision.

Your child's education provider – which could be their school or local authority – has requested that your child receive tutoring. Their personal data is being used only as necessary to deliver this tutoring. This Privacy Notice for Parents and Carers of Pupils sets out how your child's personal data, (information listed in section 4) which can be used to identify them, is collected and used to deliver the tutoring. The online platform used to deliver any online training will also process your child's personal data as part of the process. This activity will be covered by their Privacy Notice

This policy also outlines our Code of Conduct and practical guidance for parents and carers of pupils attending tuition sessions provided by Edwin Supply.

2. What is out-of-school tutoring?

Out-of-school tutoring is provided by Edwin Supply on request from your child's local authority or education provider to ensure education for children who are unable (whether temporarily or permanently) to attend a physical school setting. We also provide catch-up tuition. Pupils are able to access high-quality tutoring from an Edwin Supply tutor.

The out-of-school tutoring provided can be:

- Provided either in an alternative in-person setting (for example, a library or the pupil's home) or via the secure online tutoring platform Tutexa
- Funded by your child's education provider, such as a school or a local authority Some tutoring may be provided in an in-school setting in conjunction with out-of-school settings as a hybrid arrangement, or an arrangement to help children and young people return to school.

3. Code of Conduct and practical guidance

Tutors are agency workers introduced to your child's educational provider by Edwin Supply. Our tutors are fully vetted and checked by our compliance team. Our Safeguarding and Child Protection Policy details the checks undertaken and can be found on our website.

You can assist your child with their tuition experience by considering some of the following points:

- Online and at-home lessons should take place within an open area which is safe and appropriate in your home; please avoid using the child's bedroom.
- Video calls should take place with a neutral backdrop to maintain the privacy of your home.
- Have an adult present within earshot of online or at-home tuition sessions. You are always responsible for the welfare of your child during these sessions. Always be present or available during a tuition session, so any concerns encountered by your child can be reported as soon as possible and to ensure that both pupil and tutor are behaving in an appropriate manner. Report any inappropriate behaviour or illegal activity by a tutor to the school or education provider's Designated Safeguarding Lead.
- Report any dispute with a tutor to the school or education provider.
- Report any unsolicited communications between the tutor and student if appropriate, and ensure that your child has no inappropriate communication with the tutor outside the tuition session, and that no improper suggestions are made by either child or tutor. Please report any safeguarding concerns directly to your child's school or education provider's Designated Safeguarding Lead

- Encourage your child to be punctual to the tuition sessions, and to arrive prepared with the correct equipment where necessary (e.g. pens, notebook etc)
- Ensure your child treats their tutor with respect and fairness, and does not use abusive behaviour or language.
- Tutors are fully vetted and agree to our full range of policies regarding conduct. Should you have any child protection concerns, please contact an Edwin Supply Designated Safeguarding Lead at dsl@edwin.supply. More details on the process can be found in our Safeguarding and Child Protection Policy.
- Ensure you and your child are fully aware of their school's Safeguarding Policy.

4. Why are we collecting personal data and what personal data is being collected?

Your child's education provider has selected Edwin Supply to provide tuition. We use information about pupils to deliver that tuition.

Information about your child is provided to Edwin Supply in order for the tutor to provide an effective tutoring service. Details regarding the pupil's special educational and social needs are obtained in order to provide an effective and safe tutoring environment. Occasionally this information is gathered directly from you as the child's parent or carer either via email or verbally, and can also be provided by your child's school, local authority, or other education provider.

If your child's education provider has selected your child to receive tuition, the following types of information about your child, depending on their individual circumstances and the information provided as part of Team Around the Child (TAC) guidance, may be collected:

- Name
- Home address
- Date of birth
- Age
- Medical or health information*

- Criminal record information*
- Cookie, pixel or similar information
- Other online or offline monitoring or tracking
- Location data
- Call recordings
- Photographs and video recordings
- Records of correspondence
- Other information such as social worker and other outside agency involvement, where applicable

*considered special category data

The tutor will use your child's personal data to provide a safe and effective tutoring environment for your child.

If your child is receiving tutoring via the online platform, for the safeguarding of your child and Edwin Supply's tutor, the 'Messages' function on the system will be accessible to Edwin Group employees to review at all times. Video recordings are made of sessions and held within the Tutexa system; these can be requested to view by Edwin Group Designated Safeguarding Leads working on behalf of Edwin Supply in case of concern. Messages and video recordings will be retained for one year after the tutoring has ceased.

We may also collect contact details for you as the pupil's parent/carer in order to facilitate out-of-school sessions.

5. Who is responsible for deciding how your child's information is processed and what do we do with the information about your child?

Your child's education provider remains the data controller of your child's information. They decide how and what data will be provided to Edwin Supply (who process such personal data as a data processor) for the purposes listed in this notice; Edwin Supply requests that all pupil data is transferred to them in a secure format.
Edwin Supply will process your child's personal data by storing it, and by securely transferring necessary information to your child's tutor for the tutor to deliver your child's tutoring.

Data collected regarding your child on the online platform Tutexa, such as message history and session recordings, will be used to ensure the safeguarding of your child and the tutor delivering the session.

No automated decisions will be taken about your child when using their personal data. No individuals will be identifiable in any data tables or reports produced internally.
For any special category data we are processing about your child (see Section 4), we do not believe this will cause damage or distress. This special category data is obtained in order to ensure a safe and effective learning environment for both your child and their tutor.

6. What is the legal basis for these activities?

Edwin Supply process your child's personal data for the purposes stated in this policy pursuant to a contract that Edwin Supply has with your child's educational establishment / institution. All personal data that is processed is reasonable and necessary for those purposes.

7. How will your child's personal data be collected?

We will collect personal data about your child directly from their educational provider, or you as their parent/carer, depending on your child's individual circumstances. This will include the information referred to in Section 4.

Edwin Supply provides a form for collecting data which is completed by you or your child's education provider before the commencement of any tuition and returned to an Edwin Supply branch consultant securely. Some education providers such as local authorities may have their own standard form which is provided instead which may contain more data. This data is minimised to the essential data required for the provision of tutoring prior to storage and sharing with your child's tutor.

During the course of tutoring, more personal data may be collected in the natural course of the tutoring sessions and, as previously stated, in the case of pupils receiving tutoring via an online platform, records of the messages function and session recordings are available to the Edwin Group as a safeguarding measure for both pupil and tutor.

8. Who will personal data be shared with?

Pupils' personal data will be shared with the tutor responsible for providing your child's tutoring.

We will be using a secure, password-protected, online file-sharing system to provide your child's key information to their tutor. Tutors are provided with guidance on the Edwin Group's expectations on confidentiality and the handling of pupil data. A tutor's access to the pupil data is withdrawn upon completion of the tutoring, or if your child's tutor changes.

If your child receives online tutoring, your child will be required to use a pupil account with Tutexa. Your child's education provider, or you, will set up their pupil account, and then pass the log-in details to your child. Your child's tutor will not have access to your child's email address or their Tutexa account.

There are some instances where Edwin Supply is required to report on pupil attendance and engagement to a pupil's education provider.

Your child's data, including online platform messaging and video recording, is retained by Edwin Supply for up to one year following their last tutoring session. This data may be accessed by a restricted number of Edwin Group employees in the performance of their Data Protection and Safeguarding roles.

9. How is the security of your child's data maintained?

Edwin Supply have put in place appropriate technical and organisational security measures, in accordance with applicable data protection laws, to prevent pupils' personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, Edwin Supply and/or Tutexa will limit access to pupils' personal information to their staff members who have a business need to see it.

Any data shared between Edwin Supply and your child's tutor will be via a secure, password-protected file-sharing platform.

10. How long will pupils' personal data be kept?

Edwin Supply will retain all personal data for the duration of all tutoring, and securely delete any personal data relating to your child one year after their last tutoring session. It is kept for this time period as often pupils return for more tutoring. However, as your child's parent/carer, you may request for it to be deleted following the conclusion of your child's tutoring. Online platform and video data will be kept for the duration of one year following the conclusion of your child's tutoring for safeguarding reasons.

Any anonymised or pseudonymised data may be kept for longer for internal reporting purposes; however your child will not be identifiable from this data.

11. Is personal data being transferred outside of the European Economic Area (EEA)?

No personal data is being transferred outside of the EEA for the delivery of your child's tutoring at any time. All your child's personal data is hosted within the EEA.

12. What rights do I have over my child's personal data?

We are processing personal data on the basis of performing a contract with your child's education provider. As we are not processing on the basis of your consent, you cannot withdraw your consent to our processing of your child's personal data. Parents can withdraw your child from the tutoring and/or from their data being processed at any time by contacting your child's educational provider. We appreciate parents'/carers' support in collecting the data since it is very important for the effectiveness of your child's tutoring.

Should your child withdraw from tutoring, Edwin Supply will still use any anonymised or pseudonymised data created up to that point however, your child is no longer identifiable from that data.

Under data protection legislation, you have the right:

- To request access to information that we hold about your child (subject access request)
- To have your child's personal data rectified, if it is inaccurate or incomplete

- To request the deletion or removal of personal data where there is no compelling reason for its continued processing
- To restrict our processing of pupils' personal data (for example, permitting its storage but no further processing)
- To object to our processing, and
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on the pupil.

If at any time you wish us to update your child's data or correct errors in it, please contact dpo@edwin.group.

If you wish to make a subject access request, restrict or object to processing, please contact our Data Protection Coordinator at dpo@edwin.group, setting out details of the data you wish to obtain and periods of time which your request relates.

13. Who can I contact about out-of-school tuition?

Your child's tutor is responsible for the day-to-day delivery of tuition; if you have any queries about this element of the tutoring, please contact the Vision for Education/ABC Teachers/Smart Teachers branch providing the tutor – a list of local branch contacts can be found on the Agency's website.

Your child's education provider, or you as their parent/carer, determine which data is shared with Edwin Supply for the purposes of providing their tutoring. If you have concerns about which information has been shared about your child, or the means of sharing, we request that you raise your concern with their education provider in the first instance.

Edwin Supply determine the purpose and means of sharing your child's personal data with their tutor for the purposes of providing your child's tutoring. If you have concerns about which information has been shared about your child, or the means of sharing, we request that you raise your concern with the Edwin Group at dpo@edwin.group in the first instance.

If you remain dissatisfied, you can contact the Information Commissioner's Office, the body responsible for enforcing data protection legislation in the UK, at https://ico.org.uk/concerns.

If you have any safeguarding concerns, please report these to an Edwin Supply Designated Safeguarding Lead as soon as possible at dsl@edwin.supply.

14. Updates

We keep this privacy notice under review to make sure it is up to date and accurate. Any changes will be noted. The date when this privacy notice was last updated as shown on the cover page and in the footer at the bottom.