

National Tutoring Programme

Why are you receiving this privacy notice?

You are receiving this privacy notice because your son/daughter's school is participating in the National Tutoring Programme (NTP).

Your son/daughter's school has selected Protocol Education (your Tuition Partner) to provide catch-up tuition as part of the NTP scheme. Protocol Education (the Company) provides tutoring services for pupils. We are a "data controller", which means that we are responsible for deciding how we hold and use personal information about pupils and parents as well as data provided by schools. We are an approved provider under the NTP scheme. To deliver and evaluate the NTP scheme, we will need to capture and process personal data. This privacy notice sets out how we will collect and use this personal data.

This personal data is overlapping to the information required by the Company for the delivery of their tuition services outside of the NTP programme. This privacy information is only valid for the length of the NTP programme. If your son/daughter's school has an existing relationship, or at the end of the programme chooses to continue to have a relationship with the Company, then it is covered by their privacy materials, which can be found here - <https://www.protocol-education.com/privacy-policy>.

What is the NTP scheme?

The NTP scheme is a government-funded initiative to support schools to address the impact of COVID-19 schools closures on pupils' learning. Schools are able to access subsidised high-quality tutoring from an approved list of providers, funded by the Department for Education.

Why are we collecting personal data?

The Company will use information about pupils to deliver the NTP programme and report against services delivered.

Randstad Public Services Limited have been appointed by the Department for Education to administer and evaluate the NTP programme. They will be referred to throughout this notice as the Evaluator. Their role in evaluation is by investigating the programme's impact on pupil attainment and how this varies by different tutoring models, pupil and school characteristics. The evaluation will also look into the experiences of schools, tutors and pupils with a view to improve the delivery of similar programmes in the future. Information about your son/daughter will be used to carry out the evaluation.

In addition, your son/daughter's personal data may be used to carry out research related to the impact of Covid-19 and school closures on pupil attainment and other outcomes. This information

may be shared as part of ongoing research but no individual will be named in any reports arising from this work.

What personal data is being collected?

If the school has selected your child to receive tuition, the following types of information about your son/daughter will be collected:

- Personal data including name, date of birth, Unique Pupil Number (UPN), email address
- Information on pupil performance / attainment
- Pupil Premium status
- Special educational needs
- Children In Need (CIN) status
- Looked After Children (LAC) status
- Information about participation in the NTP scheme including attendance at tutoring sessions.

The Evaluator may request permission from the school to access your child's assessment data (if your child's school uses external assessments).

During the programme, we will also collect the following data on your son/daughter:

- Subject and key stage taught
- Tutor:pupil ratio
- Attendance record
- Learning objectives and comments
- Comments on engagement and progress towards targets
- How tutoring was delivered (face to face or online)
- When conducted online, recordings of those sessions.

Who is responsible for deciding how your son/daughter's information is processed?

The Evaluator together with relevant third parties are data controllers for the evaluation. They decide how and what data will be collected and used.

The Company is also a data controller when collecting data for the purposes of delivery and administration of the NTP scheme.

What do we do with the information about your son/daughter?

The data collected from the school will be used to deliver and evaluate the NTP programme. Data will be analysed with those of other participants in the evaluation and used to write a report. No

automated decisions will be taken about your child when using their personal data. No individuals will be identifiable in any quotes reported.

What is the legal basis for these activities?

All data gathered during the NTP scheme and its evaluation will be held in accordance with the legal framework established by the Data Protection Act 2018 and General Data Protection Regulation (GDPR) 2016/679, and will be treated in the strictest confidence by the Company and the Evaluator. The Department for Education, the Evaluator and the Company have identified the legal basis for processing the general data (legitimate interests). The legitimate interest for processing personal data is to deliver the tutoring and to administer the research by the Evaluator. Further information is available in the following privacy notices:

- The privacy notice for the appointed NTP programme administrator and the Evaluator is available at: <https://nationaltutoring.org.uk/legal/privacy-notice/>
- All data shared on the Company's tuition platform will be subject to the privacy policy available at <https://assets.protocol-education.com/pdf/privacynoticeclients.pdf>

Data may be shared with the Evaluator in order to ensure effective provision of the NTP scheme. You will be given the opportunity to opt out of your data being shared for evaluation purposes.

When tutoring sessions are recorded, this is carried out for the purposes of safeguarding (i.e. to review if a safeguarding concern is raised).

Please note that we may process information without knowledge or consent, where this is required or permitted by law.

How is the security of your son/daughter's data maintained?

The Company have put in place appropriate measures to prevent pupil's' personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to pupil's personal information to those who have a business need to see it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

Any data shared between the school and the Company will be shared via an online secure data portal, secure courier, or via alternative secure means.

How long will pupils' personal data be kept?

We will only retain personal information for as long as necessary to fulfil the purposes we collected it for. Certain information will be kept on records for up to seven years for example under legal obligations for tax reporting.

The Company will securely delete any personal information collected for the evaluation alone at the end of the NTP scheme. The Company may keep personal data collected as part of the delivery of their tuition services for longer – this is covered in the privacy notice they provide.

Full details on how long we keep personal data for is set out in our data retention policy.

Is personal data being transferred outside of the European Economic Areas (EEA)?

We do not transfer personal data outside of the UK. In situations where data may need to be transferred outside of the UK, it does not go outside of the European Economic Areas (EEA) and we will ensure a similar degree of protection in respect of personal information in accordance with the Data Protection Laws.

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

Parents can withdraw their child from the programme and/or from their data being processed. The Department for Education, the Company, and the Evaluator appreciate schools', staff's', pupils' and parents' support in collecting this data since it is very important for the validity of the results. Should your son/daughter withdraw from the programme or evaluation (i.e. decide not to engage with the Company or the evaluation), the Evaluator will still use the evaluation data that the school has provided up to that point and link it to National Pupil Database (NPD) unless you indicate otherwise.

Under data protection legislation, you have the right:

- to request access to information that is held about your son/daughter (subject access request)
- to have your son/daughter'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 processing of pupil's personal data (for example, permitting its storage but no further processing)
- to object to processing
- 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 withdraw your child's data or correct errors in it, please contact the appointed programme administrator at privacyofficer@nationaltutoring.org.uk or the Company's Data Protection Officer at dataservices@judicium.com in writing.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Who can I contact about this project?

Your son/daughter's school's chosen Tuition Partner is responsible for the day-to-day delivery of catch-up tuition, if you have any queries about this element of the NTP scheme, please contact ntp@protocol-education.com

The Evaluator determines the purposes and means of processing personal data for the evaluation of the programme. If you have concerns about the way this evaluation processes personal data, we request that you raise your concern with the appointed programme administrator at privacyofficer@nationaltutoring.org.uk.

Further information on the Evaluator and the NTP scheme can also be found at: <https://nationaltutoring.org.uk/legal/privacy-notice/>

If you remain dissatisfied about a data related issue, 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/>.

Updates

We reserve the right to vary privacy notices from time to time. Updated privacy notices will be displayed on the above website links and by continuing to use and access the NTP Programme and related services following such changes, you agree to be bound by any variation made by the Company, the Evaluator and/or the NTP programme administrator. It is your responsibility to check the privacy notices from time to time to verify such variations. We may also notify you in other ways from time to time about the processing of your personal information.