
Protocol Education is committed to protecting the privacy and security of personal information. This privacy notice describes how we collect and use personal information about clients, in accordance with the General Data Protection Regulation (GDPR).

Who Collects This Information?

Protocol Education (the Company) is a recruitment company which also provides education services for clients (such as tutoring). We are a “data controller”, which means that we are responsible for deciding how we hold and use personal information about clients (including pupils and parents as well as data provided by schools and local authorities).

Categories of Personal Information That We Collect, Process, Hold & Share

We may collect, store, and use the following categories of personal information about you:

- Personal information such as name, pupil number, date of birth, gender, and contact information
- Emergency contact and family lifestyle information such as names, relationship, phone numbers and email addresses
- Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- Attendance details (such as sessions attended, number of absences and reasons for absence)
- Financial details (in order to ensure effective payment is made)
- Performance and assessment information
- Behavioural information (including exclusions)
- Special educational needs information
- Relevant medical information
- Special categories of personal data (including relevant medical information and special educational needs information)
- Recordings of pupils and/or parents from the Company’s video conferencing platform
- Information about the use of our IT, communications and other systems, and other monitoring information.

Collecting This Information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us.

How We Use Your Personal Information

We hold personal data and use it for:

- Providing education services and extra-curricular activities to pupils, and monitoring progress and educational needs
- To provide tutoring and educational services as agreed
- Assessing performance and to set targets
- Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- Support teaching and learning
- Giving and receive information and references about past, current and prospective pupils and to provide references
- Managing internal policy and procedure
- Enabling pupils to take part in assessments and to record pupil achievements
- To carry out statistical analysis for diversity purposes
- Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- Enabling relevant authorities to monitor performance
- Monitoring use of the Company's IT and communications systems in accordance with the Company's IT security policy
- Making use of photographic images on social media and on the website
- Security purposes; and
- Where otherwise reasonably necessary for the Company's purposes, including to obtain appropriate professional advice and insurance.

The Lawful Basis on Which We Use This Information

We will only use your information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Consent: the individual has given clear consent to process their personal data for a specific purpose
- Contract: the processing is necessary for a contract with the individual
- Legal obligation: the processing is necessary to comply with the law (not including contractual obligations)
- Vital interests: the processing is necessary to protect someone's life
- Public task: the processing is necessary to perform a task in the public interest or for official functions, and the task or function has a clear basis in law and
- Legitimate Interests – the processing is necessary for the purposes of the

- Company's legitimate interests (or a third party_ provided those interests are not overridden by the rights and freedoms of the data subject.

We need all the categories of information in the list above primarily to allow us to comply with legal obligations. Please note that we may process information without knowledge or consent, where this is required or permitted by law.

National Tutoring Programme

The Company are an approved provider under the Government's National Tutoring Programme. The aim of this programme is to provide subsidised and assisted tutoring for select individuals during the pandemic to help close the attainment gap.

As part of this programme, we may be required to share personal data with the Government and approved third parties. This is necessary in order to ensure appropriate funding is provided, appropriate services are offered and to determine effective performance of the programme. We will also be required to provide evidence of positive pupil progress.

We will be required to share the following data:

- Pupil data: Pupil's name, age or date of birth and year group
- SEN status
- CIN status
- LAC status
- Pupil's eligibility for Pupil Premium
- Tutor data: Tutor's name, highest qualification and email address
- Pupil's attendance record
- Tutor:pupil ratio; and
- Type of delivery (face-to-face vs. online)

The Company will also be required to record (and share) recordings of each tutoring session as well as communications with pupils.

Collecting Data for Test and Trace

In the current pandemic, we may need to store your data for test and trace purposes. This is in order for the Company to engage with the test and trace process, make decisions on safety and whether individuals are required to self-isolate or carry out a test. To do this we will be recording your name, contact number and date and time of arrival as well as time of departure.

To complement the above we may also ask for data that has not previously supplied. This will allow us to assess an individual's ability to attend services and what measures may need to be put in place to allow for safety. We, additionally, may need to collect data about individuals that you reside with in order to factor in appropriate considerations for their wellbeing.

All data collected by the Company will be processed in accordance with our retention, destruction, data protection and data security policies. All data collected for test and trace purposes will be retained for 21 days in accordance with government guidelines.

The legal bases for using your data in these circumstances will be for the reasons of substantial public interest and in the interests of public health. Dependant on circumstances the basis may be to assess the working capacity of an employee or to protect the vital interests of yourself or another person. We may need to share select data with others. This can be with the NHS and emergency services, public health, public authorities as well as other stakeholders. This will only be done where it is necessary and proportionate for us to do so.

Sharing Data

We may need to share your data with third parties where it is necessary. There are strict controls on who can see your information. We will not share your data if you have

advised us that you do not want it shared unless it is the only way we can make sure you stay safe and healthy or we are legally required to do so.

We share pupil information with:

- Local Authorities
- The school attended by the pupil
- NHS
- Welfare services (such as social services)
- Law enforcement officials such as police
- HMRC
- Local Authority Designated Officer
- Professional advisors such as lawyers and consultants
- Support services (including insurance, IT support, information security) • Providers of learning software and
- Government Agencies.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

We may transfer your personal information outside the EU. If we do, you can expect a similar degree of protection in respect of your personal information.

Storing Data

The Company keep information on computer systems and sometimes on paper.

Except as required by law, the Company only retains information for as long as necessary in accordance with timeframes imposed by law and our internal policy.

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

Automated Decision Making

Automated decision making takes place when an electronic system uses personal information to make a decision without human intervention. We are allowed to use automated decision making in limited circumstances.

Pupils will not be subject to automated decision-making, unless we have a lawful basis for doing so and we have notified you.

Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way).

Requesting Access to Your Personal Data

Under data protection legislation, data subjects (including parents and pupils) have the right to request access to information about them that we hold.

You also have the right to: -

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purposes of direct marketing
- Object to decisions being taken by automated means
- In certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- Claim compensation for damages caused by a breach of the data protection regulations.

If you want to exercise any of the above rights, please contact Protocol Education at brian.todd@protocol-education.com or the 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.

Right to Withdraw Consent

In circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your

consent for that specific processing at any time. To withdraw your consent, please contact Brian Todd at brian.todd@protocol-education.com or the Data Protection Officer at dataservices@judicium.com. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with please contact Brian Todd in the first instance.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Brian Todd, then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited Address: 72 Cannon Street, London, EC4N 6AE
Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk Lead Contact: Craig Stilwell

You have the right to make a complaint at any time to the Information Commissioner's Office, the UK supervisory authority for data protection issues at <https://ico.org.uk/concerns>.

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.