

# Privacy Notice

Date	Version	Created by	Description of change
3/07/2022	1	Head of Operations	Basic document outline
11/08/2022	1.1	Head of Operations	Added and changed
20/07/2023	2	Lead Administrator (AT)	Amended & updated.

## Introduction to our Privacy Notice

Capital Tuition Group (CTG) is a company registered in England and Wales (Companies House 13506520) under the name Capital Tuition Group Ltd; the address of our registered office is Capital Tuition Group Ltd. Office 2, 1 Archway Mews, Purney, London, SW15 2PE. We are registered as a data controller with the Information Commissioner's Office (ICO Reference Number ZB264017).

CTG is committed to being transparent about how it collects and uses the personal data of its members and parents and to meeting its data protection obligations. This policy sets out the organisation's commitment to data protection, and individual rights and obligations in relation to personal data. CTG is committed to complying with data protection legislation and good practice including:

- Processing personal information only where this is strictly necessary for legitimate organisational purposes
- Collecting only the minimum personal information required for these purposes and not processing excessive personal information
- Providing clear information to individuals about how their personal information will be used and by whom
- Only processing relevant and adequate personal information
- Processing personal information fairly and lawfully
- Maintaining an inventory of the categories of personal information processed by CTG
- Keeping personal information accurate and, where necessary, up to date
- Retaining personal information only for as long as is necessary for legal or regulatory reasons or, for legitimate organisational purposes
- Respecting individuals' rights in relation to their personal information, including their right of subject access Keeping all personal information secure

## **Responsibilities under the General Data Protection Regulation (GDPR)**

CTG is a Data Controller and a Data Processor under the GDPR. The Management Team are responsible for developing and encouraging good information handling practices within the organisation. Compliance with data protection legislation is the responsibility of all staff at CTG who process personal information.

## Clients

### What do we collect?

Registration, parent details, student details: This includes details such as your name, email address, address, telephone number, your child's name, your child's school year and your child's educational background.

### What is the purpose of us collecting and using Student information?

- to support our students' learning
- to monitor and report on their progress
- to provide appropriate pastoral care
- to assess the quality of our services
- to comply with the law regarding data sharing
- for safeguarding purposes

## Tutors and CTG Staff

### What do we collect?

Contact Details, professional qualifications details: This includes details such as your name, telephone number, email address, relevant qualifications held and details of relevant teaching / tutoring experience, references, self disclosure information. We may also store your bank details for the purpose of making payments to you for work done through CTG.

### What is the purpose of us collecting and using CTG Staff and Tutor information?

- enable the development of a comprehensive picture of the workforce and how it is deployed
- managing CTG Tutors
- informing the development of recruitment and retention policies
- enabling individuals to be paid
- monitoring staff attendance
- safeguarding purposes
- dealing with reference requests

## Schools and External Organisations

### What do we collect?

Details for organisation and delivery of Learning Pods : This includes details such as names of students participating, their educational background including current and target grades, SEND and medical conditions, contact details of parent/ guardian, student email address in order to access learning lessons.

### What is the purpose of us collecting and using this information?

- to contact families as needed to ensure understanding of Learning Pods and attendance to sessions
- to be able to create schemes of work tailored to the ability and academic needs of the student group
- to be able to fulfil the scope of the contract requirements outlined by the school
- to be able to analyse student and cohort performance during the Learning Pod and report this back to the school
- for safeguarding purposes

### What do we do with your information?

We will use your personal data to fulfil tutoring requests, meet our contractual obligations, and deliver a high quality service to clients, schools and organisations as well as provide suitable tuition assignments to CTG Tutors.

### How do we keep your information safe?

We take reasonable steps to ensure that your information is kept safe and will endeavour to protect it from unauthorised access. Your information will be kept securely in line with [Capital Tuition Group - Data Management Policy and Procedures](#).

### Access to your data

You have the right to request a copy of all personal information that we hold about you at no cost. We will also correct any inaccuracies in your information at your request. To make a request for personal information held about yourself, individuals should contact CTG's Data Protection Officer (DPO) Noor Valmohamed.

There is also the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means

- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed - for more information see our [Right to Erasure Procedure](#)
- claim compensation for damages caused by a breach of the Data Protection Regulations

If you have a concern about the way we are collecting or using personal data, you should raise your concern with the Data Protection Officer in the first instance or directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Client Marketing**

Occasionally we will contact you with information about courses or other services that we think may be of interest to you. This will usually be by email or phone call. Some of our emails and newsletters may employ tracking so that we can monitor at an individual level whether a recipient has opened the email and what content they have clicked on. We only send our newsletter to recipients where there is a legitimate interest to do so. We will always provide you with the option to opt out of these notices. We will never sell your information to third parties.

### **Sharing information with third parties**

## **Clients:**

After clients have reviewed a relevant tutor profile and choose to proceed with this tutor, we will share the student details with the tutor so that the tutor knows where the tutoring will happen, so that the tutor can prepare for the assignment and so that the tutor can contact the client to arrange lessons. Other than sharing information with a specific tutor on the basis outlined above we will keep your personal information confidential within our company and not pass it on to any third parties unless we are required to do so by law.

Any recording of a live lesson without explicit permission from Capital Tuition Group and all other stakeholders involved in the tuition is strictly forbidden and prohibited. Such an act may constitute a criminal offence. Any unauthorised capture of live lessons in any format (on the part of staff or students) will therefore be subject to Capital Tuition Group's disciplinary processes, including being reported to the Information Commissioner's Office (ICO) and, where appropriate, escalation to the Police.

If there are significant grounds that a tutor or student has a need to request a recording of a live lesson (for example due to significant learning needs or a specific requirement of a school) a written request in the first instance would need to be made to Capital Tuition Group via email [hello@capitaltuitiongroup.com](mailto:hello@capitaltuitiongroup.com). Capital Tuition Group would reserve the right to reject this request if it was deemed to present any form of concern in relation to GDPR. If Capital Tuition Group decided it appropriate to consider this request, firstly notice of the request would be provided to all other stakeholders involved in the tuition. Secondly, the request would only be granted once written confirmation of the agreement to a lesson recording was obtained from all parties.

Under no circumstances should lesson links be passed on to a third party by any means. This includes via email, private messaging, social media and or any other methods. Any unauthorised passing on of a lesson link to anyone other than the approved lesson participants will therefore be subject to Capital Tuition Group's disciplinary processes, including being reported to the Information Commissioner's Office (ICO) and, where appropriate, escalation to the Police. Should Capital Tuition Group attain sufficient evidence to suggest that a lesson link has been passed on by any student, Capital Tuition Group reserves the right to ban and cancel this student from the tuition. In this instance, Client of the student in question will not be eligible for a refund of any prepaid tuition.

## **Tutors:**

The information that you provide to CTG forms the basis of a tutor profile. This includes the following information: a photograph, the subjects that you teach, your teaching experience, personal biography, your personal teaching approach, and testimonials. This profile may be published on the CTG system with your permission. CTG may share your profile with prospective clients. We will pass on your contact details to clients who have chosen to proceed with you as a tutor. Other than sharing information with our clients on the basis outlined above we will keep your personal information confidential within our company and not pass it on to any third parties unless we are required to do

so by law.

### Schools:

So that CTG can fulfil its duties to your students, CTG needs to keep and use your students' and their parents'/guardians' personal data. As part of the Learning Pod Ts & Cs, you consent to CTG holding and using that data and transferring it to prospective Tutors only, as necessary, with suitable safeguards to your students and their parents/guardians, with a legitimate reason to need it in connection with the Tutor's work for CTG.

## Changes to this policy

This policy may be changed or amended at our absolute discretion, so you should review it from time to time so you are aware of any changes.

## Contact

If you have any questions, please contact us at [hello@capitaltuitiongroup.com](mailto:hello@capitaltuitiongroup.com).

**This policy will be reviewed annually in line with current best practice and KCSIE/DFE guidance.**

Approval Date	Renewal date	Version No.	Approved by	Date
21.7.21	1.9.22	01	Matthew Curnier (Director)	21.7.21
1.09.22	1.9.23	02	Matthew Curnier (Director)	1.9.22
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