

# Privacy Notice for Students

## Seven Springs Education



<b>Approved by:</b>	Willow Hewitt	<b>Date:</b> 02/11/22
<b>Last reviewed on:</b>	02/11/22	
<b>Next review due by:</b>	02/11/23	

## Contents

1. Introduction	3
2. The personal data we hold	3
3. Why we use this data	3
4. Our lawful basis for using this data	4
5. Collecting this data	5
6. How we store this data	5
7. Who we share data with	6
8. Your rights	8
9. Complaints	9
10. Contact us	9

## 1. Introduction

This privacy notice is written in a child-friendly language, so it is easier for a student, like you, to understand. It is for students aged 12 or older.

Parents and carers should refer to our '[Privacy Notice for Parents and Carers – On The Use of Your Child's Personal Data](#)'.

You have a legal right to be informed about how our organisation uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

This notice explains how we collect, store and use personal data about **students at Seven Springs Education**, like you.

We, Seven Springs Education of Nebula Education Ltd ([school@seven-springs.co.uk](mailto:school@seven-springs.co.uk), 07392013379), are the 'data controller' for the purposes of UK data protection law.

For the National Tutoring Programme, we are the 'data processor'.

Our Data Protection Officer (DPO) is Nicola Cook at [Schools DPO](#).

Our Data Protection Lead is Joyce Wong.

(see 'Contact us' below)

This policy may be replaced by a policy that we have with your school as a part of the National Tutoring Programme. You should read the appropriate privacy notice provided to you by your school or us in relation to you joining us as a part of the National Tutoring Programme.

## 2. The personal data we hold

We hold some personal information about you to make sure we can help you learn and look after you at Seven Springs Education.

For the same reasons, we get information about you from some other places too – like your school, the local council and the government.

Personal information that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Your personal information such as your name, school name, grade and gender
- Your contact details and contact preferences
- Your attendance records
- Details of any behavioural information, including issues or exclusions
- Details and data from your use of our systems such as homework uploaded to our video learning platform and comments on our online learning platform, Spring
- Academic and learning records including assessment results, completed work and tutor feedback

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about your characteristics, such as your ethnic background or any special educational needs
- Information about any medical conditions, including physical and mental health that may impact learning

- Photographs, recordings and chat history from our online learning platform and Zoom
- Information about your family circumstances
- Information about family finances (used for financial support and bursary schemes)

### 3. Why we use this data

We use the data listed above to:

- Provide you with tutoring and educational services
- Get in touch with you, your parents and your school when we need to
- Check how you're doing in exams and work out whether you or your school teachers need any extra help
- Track how well the students at Seven Springs Education as a whole are performing
- Look after your wellbeing
- Promote Seven Springs Education on social media and on our website(s) (only with your consent)

#### 3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you messages by email or text promoting Seven Springs Education events, campaigns, charitable causes or services that you might be interested in.

You can take back this consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.2 Use of your personal data in automated decision making and profiling

We don't currently put your personal information through any automated decision making or profiling process. This means we don't make decisions about you using only computers without any human involvement.

If this changes in the future, we will update this notice in order to explain the processing to you, including your right to object to it.

### 4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a 'lawful basis' to do this.

Our lawful bases for processing your personal information for the reasons listed in section 3 above are:

- For the purposes of (e), in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:
  - Keeping Children Safe in Education, 2022
  - Working Together to Safeguard Children, 2018
  - Section 175 of the Education Act 2002
- For the purposes of (f), in accordance with the 'consent' basis – we will obtain consent from you to use your personal data
- For the purposes of (a), (b), (c), and (d), in accordance with the 'contract' basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us

- For the purposes of (d), in accordance with the 'legitimate interests' basis – where there's a minimal privacy impact and we have a compelling reason, including:
  - Monitoring how students perform for quality assurance and improvement

Where you've provided us with consent to use your information, you may take back this consent at any time. We'll make this clear when requesting your consent, and explain how you'd go about withdrawing consent if you want to.

#### 4.1 Our basis for using special category data

For 'special category' data (more sensitive personal information), we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security or social protection law
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for public health reasons, and it's used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made obviously public by you
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation

## 5. Collecting this data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we want to collect information from you, we make it clear if you have to give us this information (and if so, what the possible consequences are of not doing that), or if you have a choice.

Most of the data we hold about your child will come from you, but we may also hold data about you from:

- Your school
- Your family
- Local authorities
- Government departments or agencies (such as the Department for Education)
- Police forces, courts, tribunals

## 6. How we store this data

We keep personal information about you while you're enrolled at Seven Springs Education. We may also keep it beyond your attendance with us if this is necessary. Our Records Management, Retention and Disposal Policy sets out how long we keep information about students. We'll dispose of your personal data securely when we no longer need it.

We store data on our systems, such as platforms and computers, and on third-party services such as Google Drive, Gmail and Mailerlite. These enable us to provide our services as an education provider. You can view their privacy policies on their websites.

We have security measures in place to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

These measures include:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data, are password protected or kept under lock and key when not in use
- Papers containing confidential personal data must not be left anywhere where there is general access
- Strong passwords are used to access systems - passwords are at least 8 characters and may include the following: uppercase letters, lowercase letters, numbers and special characters. Staff and students are reminded that they should not reuse passwords from other sites and are recommended to use passphrases
- Encryption is used where appropriate such as for stored passwords and personal data contained in databases
- Two factor authentication is used where appropriate
- Staff who store personal information on their personal devices or use them for Seven Springs Education related work are expected to follow the Seven Springs Education's Code of Conduct, Online Safety, Data Protection and Record Management, Retention and Disposal policies
- Where we need to share personal data with a third party, we carry out due diligence and take reasonable steps to ensure it is stored securely and adequately protected

We also have measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified DPO and DPL, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 4)
- Completing data protection impact assessments where Seven Springs Education's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the DPO will advise on this process)

- Integrating data protection into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a training record
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Appropriate safeguards being put in place if we transfer any personal data outside of the UK, where different data protection laws may apply
- Maintaining records of our processing activities, including:
  - For the benefit of data subjects, making available the name and contact details of Seven Springs Education, the DPL and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)
  - For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the UK and the safeguards for those, retention periods and how we are keeping the data secure

## 7. Who we share data with

We don't share information about you with any third party without your consent unless the law and our policies allow us to do so.

Where it's legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Your school
- Your local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies (such as the Department for Education and Tribal for the National Tutoring Programme)
- Health authorities
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

### 7.1 Transferring data internationally

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

### 7.2 Use of Zoom for online learning

We use Seven Springs Education's Teaching Platform(s) and Zoom classrooms, a secure online video software, to deliver online lessons.

You are responsible for creating Zoom accounts for the purposes of online lessons with Seven Springs Education, and thereby accept the terms of their privacy notices. You can find out how Zoom uses your information in their privacy notice which can be found at <https://explore.zoom.us/docs/en-us/privacy.html>.

## 8. Your rights

### 8.1 How to access personal information that we hold about you

Individuals have a right to make a 'subject access request' to gain access to personal information that Seven Springs Education holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
- The safeguards provided if the data is being transferred internationally

Subject access requests can be submitted in any form, but we may be able to respond to requests more quickly if they are made in writing and include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the information requested

### 8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal information is used and kept safe. For example, you have the right to:

- Say that you don't want your personal information to be used
- Stop it being used to send you marketing materials
- Say that you don't want it to be used for automated decisions (decisions made by a computer or machine, rather than by a person)
- In some cases, have it corrected if it's inaccurate
- In some cases, have it deleted or destroyed, or restrict its use
- Withdraw your consent, where you previously provided consent for your personal information to be collected, processed and transferred for a particular reason
- In some cases, be notified of a data breach



- Make a complaint to the Information Commissioner's Office
- Claim compensation if the data protection rules are broken and this harms you in some way

To exercise any of these rights, please contact us (see 'Contact us' below).

## 9. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concerns about our data processing, please let us know first.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 10. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, you may contact our **Data Protection Officer**:

Our Data Protection Officer(DPO) is:

Nicola Cook at [Schools DPO](#)

[nicola@schoolsdpo.com](mailto:nicola@schoolsdpo.com)

However, our **Data Protection Lead** has day-to-day responsibility for data protection issues at Seven Springs Education.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them:

Joyce Wong

[joyce@seven-springs.co.uk](mailto:joyce@seven-springs.co.uk)