

# SPARK ACADEMY

## DATA PROTECTION POLICY

### 1. Purpose

At Spark Academy Tutoring, we take the privacy and security of personal information very seriously. This policy explains how we collect, store, use, and protect personal information about our students, parents, tutors, and partners. We are committed to ensuring that all information is handled fairly, lawfully, and securely.

### 2. Our Commitment

- We respect the privacy of all students, parents, and tutors.
- We will only use personal information for the purpose it was provided.
- We do not share personal data with any third parties unless there is a legal or safeguarding requirement to do so.
- We keep all personal information secure and confidential at all times.

### 3. What Information We Hold

We may hold the following types of personal information:

- For students: name, date of birth, address, parent/carer contact details, school information, learning records, and any relevant educational or safeguarding information.
- For parents/carers: name, contact details, and communication preferences.
- For tutors: name, contact details, DBS details, qualifications, references, and payment information.

We only collect information that is necessary to provide our tutoring services safely and effectively.

### 4. How Information Is Stored

We store personal information securely using password protection and access control.

- Student and parent information is stored on a password-protected laptop and in our secure online platform (Tutor Bird), which is also password protected.
- Tutor information is stored on a password-protected laptop and within Gmail iCloud, which uses two-factor authentication (2FA) for additional security.
- Only the Director and administrative support staff have access to these systems.
- Access is restricted to those who need the information to perform their role.

### 5. Sharing of Information

We only share personal information when necessary and appropriate.

- Student information may be shared with:
  - Parents or carers
  - Schools or local authorities (where required for education provision or safeguarding)
- Tutor information is shared only with the Director, administrative staff and educational partners as needed.
- A student's address or contact details are only shared with the specific tutor who is working directly with that student, and only when necessary for the delivery of lessons.
- We will never sell or pass on personal information to external marketing or third-party organisations.

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### 6. Confidentiality

All personal information is treated with full confidentiality. Tutors and staff are expected to:

- Keep any information shared with them confidential and secure.
- Only use personal data for the purpose of providing tuition.
- Report any data concerns or breaches immediately to the Director.

### 7. Data Security Measures

To keep information safe, Spark Academy Tutoring:

- Uses strong passwords and two-factor authentication (2FA) on Gmail cloud accounts and devices.
- Ensures laptops and devices are secure and regularly updated.
  - Limits access to authorised individuals only.
  - Does not print or share information unnecessarily.

If a data breach occurs, it will be reported immediately to the Director, who will take appropriate action in line with data protection guidance.

### 8. Retention of Information

We only keep personal information for as long as it is necessary:

- Student and parent records are retained for as long as the student is enrolled, and for a short period afterwards to meet any reporting or safeguarding obligations.
- Tutor information is retained for the duration of their engagement with Spark Academy.

When information is no longer needed, it will be securely deleted or destroyed.

### 9. Rights of Individuals

Everyone whose information we hold has the right to:

- Ask what information we hold about them.
- Request corrections to any inaccurate information.
- Ask for their information to be deleted (where legally possible).
- Withdraw consent for information to be used, unless it is required for safeguarding or legal reasons.

Requests should be made in writing to [contact@sparkacademytutoring.com](mailto:contact@sparkacademytutoring.com).

### 10. Contact and Responsibility

The Director of Spark Academy Tutoring is responsible for ensuring this policy is followed and for handling any data protection queries or concerns.

If you have any questions about how we handle data, please contact:

Email: [contact@sparkacademytutoring.com](mailto:contact@sparkacademytutoring.com)

Telephone: 01226 899567

### 11. Review

This policy will be reviewed annually, or sooner if there are changes in legislation or company procedures.

Approved by: Becky Ingram

Position: Director, Spark Academy Tutoring

Date: October 2025

Next Review Date: October 2026