

# SPARK ACADEMY

## DATA PROTECTION AND INFORMATION MANAGEMENT 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, share and protect personal information relating to our students, parents/carers, tutors, staff and educational partners.

We are committed to ensuring that all personal information is handled fairly, lawfully, transparently and securely. This policy reflects our obligations under the Data Protection Act 2018 and UK General Data Protection Regulation (UK GDPR).

Spark Academy Tutoring only collects and processes personal information that is necessary for the safe, effective and appropriate delivery and management of our tuition and educational services, or where we have another legitimate or legal reason for doing so.

### 2. Our Commitment

Spark Academy Tutoring:

- Respects the privacy of all students, parents/carers, tutors, staff and educational partners.
- Only collects personal information that is relevant and necessary for the delivery and management of our services.
- Only uses personal information for legitimate and appropriate purposes.
- Limits access to personal information to authorised individuals who require it to carry out their role.
- Only shares personal information where there is a legitimate, safeguarding, contractual or legal reason for doing so.
- Keeps personal information secure and confidential.

Spark Academy Tutoring adheres to the seven key principles of UK GDPR, ensuring that personal data is processed lawfully, fairly and transparently; collected for specified and legitimate purposes; limited to what is necessary; kept accurate and up to date; retained only for as long as required; stored securely and confidentially; and managed responsibly in accordance with the principle of accountability.

We will only process personal data where there is a lawful basis for doing so. Depending on the circumstances, this may include processing that is necessary to fulfil a contract, comply with a legal obligation, pursue our legitimate interests, or, where appropriate, where consent has been specifically obtained.

### 3. What Information We Hold

We may hold the following types of personal information:

- Students: name, date of birth, address, parent/carer contact details, school or educational setting information, learning records, attendance information and relevant educational, SEND, health or safeguarding information.
- Parents/carers: name, contact details, communication information and other information necessary to arrange and manage tuition.
- Tutors and staff: name, contact details, DBS information, qualifications, references, employment or engagement information and payment information.
- Educational partners and professionals: relevant contact and professional information required to coordinate and deliver educational provision.

We only collect information that is relevant and necessary to provide and manage our tuition and educational services safely and effectively.

# SPARK ACADEMY

## DATA PROTECTION AND INFORMATION MANAGEMENT POLICY

### **4. Special Category and Sensitive Information**

Due to the nature of our educational services, Spark Academy Tutoring may need to process information relating to a learner's health, SEND, additional needs or other sensitive circumstances.

Such information will only be collected and processed where it is relevant and necessary for the safe and appropriate delivery of the learner's education, to meet safeguarding or legal responsibilities, or where another appropriate lawful basis and condition for processing applies.

Special category and sensitive information will be treated with particular care and will only be accessible to individuals who have a legitimate need to know the information.

### **5. How Information Is Stored**

We store personal information securely using appropriate password protection, access controls and security measures.

- Student and parent/carer information is stored on secure password-protected devices and within our secure online systems, including TutorBird.
- Tutor and staff information is stored securely within password-protected systems and authorised cloud-based services.
- Two-factor authentication (2FA) is used where available to provide additional security.
- Access is limited to the Director, authorised administrative staff and other individuals who require specific information to perform their role.
- Systems and devices are kept secure and updated appropriately.

### **6. Sharing of Information**

Spark Academy Tutoring operates on a need-to-know basis. Personal information is only shared where it is necessary, appropriate and there is a legitimate or lawful reason for doing so.

Information may be shared with:

- The specific tutor working directly with a student, where the information is necessary to safely and effectively deliver tuition.
- Authorised Spark Academy administrative staff where information is required to arrange, administer or manage provision.
- Parents or carers, where appropriate.
- Schools, Local Authorities or other educational professionals where this is necessary to coordinate or deliver educational provision.
- Safeguarding professionals, Local Authorities, the police or other appropriate agencies where information needs to be shared to protect a child or another individual or to meet a safeguarding or legal obligation.
- Professional or service providers where this is necessary for the operation of our services and appropriate data protection arrangements are in place.

A student's address, contact details, educational information or other personal information will only be provided to tutors or staff where they genuinely require that information to carry out their role.

Spark Academy Tutoring will not sell personal information or provide it to third parties for unrelated marketing purposes.

Where there is a safeguarding concern, information may be shared without consent where this is necessary and lawful to protect a child or another person.

# SPARK ACADEMY

## DATA PROTECTION AND INFORMATION MANAGEMENT POLICY

### 7. Confidentiality

All personal information is treated confidentially. Tutors, staff and others working on behalf of Spark Academy Tutoring are expected to:

- Keep information shared with them confidential and secure.
- Only access and use personal information that they need to perform their role.
- Only use personal information for the purpose for which it has been provided.
- Not disclose information to unauthorised individuals.
- Report any data protection concerns, loss of information or suspected breaches immediately to the Director.

### 8. Data Security Measures

To protect personal information, Spark Academy Tutoring:

- Uses strong passwords and two-factor authentication (2FA) where available.
- Ensures laptops and other devices used to access personal information are appropriately secured and regularly updated.
- Limits access to authorised individuals.
- Avoids printing, downloading or sharing personal information unnecessarily.
- Takes reasonable steps to protect information against unauthorised access, loss, alteration or disclosure.

Any actual or suspected personal data breach must be reported immediately to the Director. The Director will assess and document the breach and take appropriate action in accordance with UK data protection legislation.

Where a personal data breach meets the relevant legal threshold, Spark Academy Tutoring will notify the Information Commissioner's Office (ICO) without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Affected individuals will also be informed where required by law.

### 9. Retention of Information

Spark Academy Tutoring will only retain personal information for as long as it is necessary for the purpose for which it was collected and in accordance with relevant legal, contractual, educational, financial and safeguarding requirements.

Records may therefore need to be retained after tuition or an individual's engagement with Spark Academy Tutoring has ended where there is a legitimate or legal reason for doing so.

Information that is no longer required will be securely deleted, destroyed or anonymised as appropriate.

# SPARK ACADEMY

## DATA PROTECTION AND INFORMATION MANAGEMENT POLICY

### 10. Rights of Individuals

Individuals have rights in relation to their personal information under UK data protection legislation.

Depending on the circumstances, these may include the right to:

- Be informed about how their personal information is used.
- Request access to personal information held about them.
- Request correction of inaccurate or incomplete information.
- Request deletion of personal information where applicable.
- Request restriction of processing in certain circumstances.
- Object to certain types of processing.
- Request data portability where applicable.
- Withdraw consent where consent is specifically being relied upon as the lawful basis for processing.
- Exercise applicable rights relating to automated decision-making and profiling.

These rights are subject to the exemptions and limitations contained within data protection legislation and may not apply in every circumstance.

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

### 11. Contact and Responsibility

The Director of Spark Academy Tutoring is responsible for overseeing data protection within the organisation, ensuring this policy is followed and responding appropriately to data protection queries, concerns and breaches.

Questions or concerns regarding the way Spark Academy Tutoring handles personal information should be directed to:

Email: [contact@sparkacademytutoring.com](mailto:contact@sparkacademytutoring.com)  
Telephone: 0330 043 2488

Individuals also have the right to raise concerns regarding the handling of their personal information with the Information Commissioner's Office (ICO).

### 12. Review

This policy will be reviewed annually, or sooner where there are significant changes to legislation, regulatory guidance or Spark Academy Tutoring's procedures.

Reviewed by: Becky Kowalski  
Position: Director, Spark Academy Tutoring  
Review Date: August 2026  
Next Review Date: August 2027