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Introduction

At Learning Academies we provide high quality, extra tuition for 4-16 year olds. Each child follows an individual programme designed to raise attainment, secure their educational goals and, at the same time, develop the skills needed to be confident, assertive learners. Our tutoring is highly effective with a proven track record of success. Tutoring is accessed via the iAchieve Extra Tuition Programme (after school) or the iAspire 1:1 Tutoring programme for students outside of mainstream education (during the school day).

As a company we aim to exceed your expectations in all we do and seek to operate within a 'privacy by design' framework that reflects best practice.

At Learning Academies, in relation to privacy, we are committed to:
Transparency | Simplicity | Control

Our Aims:

We work to ensure that:

- We are fully transparent in all we do. Whether this is in relation to the terms and conditions of your booking or the data you entrust us with to deliver a highly effective tuition service.
- We communicate effectively, using simple, easy-to-understand language. We want all involved with Learning Academies to be clear about what we do, how we do it and why we work the way we do.
- You have full control over your data.
- You are confident in our ability to work safely and with full regards to the law.

Your trust and confidence is a key priority for us.

Background:

At Learning Academies we understand that your privacy is important to you and that you care about how your personal data is used and shared online. We respect and value the privacy of everyone who comes in contact with our company including those who visit our website; www.learningacademies.co.uk ("Our Site") as well as those who access our tuition services either as a customer or as a team member (e.g. tutors). As a company we only collect and use personal data in the ways that are described here, and in a manner that is consistent with Our obligations and your rights under the law.

Please read this Privacy Policy carefully and ensure that you understand it. Your acceptance of Our Privacy Policy is deemed to occur upon your first use of Our Site at time of booking. For those who joined our Company prior to this Privacy Policy, acceptance is deemed to have occurred when this document was shared with all customers (29th March 2018). Those wishing to make a booking with Learning Academies (and therefore opting to share further personal details) are explicitly asked to agree to our Terms and Conditions as well as this Privacy Policy. We respectfully ask that those who are not in agreement with our Booking Terms and Conditions and this Privacy Policy do not complete a booking registration.

Review Schedule

Last Updated
February 2018
19 th March 2018
10 th April 2018
3rd February 2019

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Definitions and Interpretation:

In this Policy, the following terms shall have the following meanings:

- “Personal data”** Means any and all data that relates to an identifiable person who can be directly or indirectly identified from that data. In this case, this means personal data that you give to Us via Our Site or via an external referral form that you submit to Learning Academies. It also includes data provided to us by potential team members during a recruitment process and that provided by team members to undertake their roles with us. This definition shall, where applicable, incorporate the definitions provided in EU Regulation 2016/679 – the General Data Protection Regulation (“GDPR”).
- “We/Us/Our”** Means the tuition provider and includes all employees, agents and sub-contractors of the Tuition Provider. Each student’s tuition provider is listed under the relevant booking page of the website. (www.learningacademies.co.uk). Where no provider is listed, the provider is Learning Academies Ltd. (The Parent Company). Learning Academies Ltd, a limited company registered in England under company number 6206322 whose registered address is Academy House, 39 Hazel Close, Thorrington, CO78HJ.
- “Cookie”** Means a small text file placed on your computer or device by Our Site when you visit certain parts of Our Site and/or when you use certain features of Our Site. Details of the Cookies used by Our Site are set out below;

About Us:

Our website is operated by Learning Academies Ltd (Company details above). Our VAT number is 174498369. Our Lead Data Protection Officer is Sacha Brakenbury and she can be contacted by email at sacha@learningacademies.co.uk by telephone on 0845 463 1342 or by post at Academy House, 39 Hazel Close, Thorrington, Essex, CO78HJ. Additionally, all Education Directors hold the post of Data Protection Officer. Learning Academies Ltd is a member of the UK Register of Learning Providers. Learning Academies takes its responsibility as data controller seriously. Each student’s tuition provider is listed under the relevant booking page of the website. (www.learningacademies.co.uk). Where no provider is listed, the provider is Learning Academies Ltd. (The Parent Company). Learning Academies Ltd, a limited company registered in England under company number 6206322 whose registered address is Academy House, 39 Hazel Close, Thorrington, CO78HJ.

Scope of this Policy:

This Privacy Policy applies only to your use of Our website and the delivery of Our Services as well as our handling of data in regards to staff and wider team members. Our Site may contain links to other websites. Please note that We have no control over how your data is collected, stored, or used by other websites and We advise you to check the privacy policies of any such websites before providing any data to them. A separate Privacy Policy exists 11+ Mock Exams bookings, which are made via Eventbrite. A copy of the Learning Academies Eventbrite Policy can be found on Our website at www.learningacademies.co.uk.

Legal Framework

At Learning Academies we work in full compliance with the General Data Protection Regulation 2018 and Data Protection Act 2018. This came into force on 25th May 2018, building upon the foundations of the previous Data Protection Act 1998. GDPR updates processes and procedures and aims to simplify compliance by providing a single law applicable to businesses in all EU countries, rather than having 28 different laws. GDRP will still apply post-Brexit.

Our Responsibilities:

	We will only collect and retain relevant and essential data. We will share this only in the ways outlined, with organisations and individuals that are integral to the delivery of your tuition programme or your work as tutors and team members.
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	We will store your information safely and securely, protecting it from loss, misuse, unauthorised access and disclosure.
	We will ensure that appropriate technical measures are in place to protect your personal data.
	We will destroy your information securely, holding data only for such time as is essential to achieve the purpose for which it was collected.
	We will work hard to keep your personal data up to date and accurate.
	We will comply fully with our obligations under the GDPR.

Your Rights:

As a data subject, you have the following rights under the GDPR, which this Policy and Our use of personal data have been designed to uphold:

	The right to be informed about Our collection and use of your personal data.
	The right of access to the personal data We hold about you.
	The right to rectification if any personal data We hold about you is inaccurate or incomplete.
	The right to be forgotten – i.e. the right to ask Us to delete any personal data We hold about you (We hold personal data for the minimum time required to achieve the purpose for which it is collected. If you would like Us to delete your data sooner, please contact Us.
	The right to restrict (i.e. prevent) the processing of your personal data.
	The right to data portability (obtaining a copy of your personal data to re-use with another service or organisation).
	The right to object to Us using your personal data for particular purposes; and
	Rights with respect to automated decision making and profiling.

What Data Do We Collect From Our General Website Visitors?

Depending upon your use of Our Site, We may collect some or all of the following personal and non-personal listed below.

Please also see the section below entitled 'Our Use of Cookies and Similar Technologies' and Our Cookie Policy – a copy of which can be found on our website at www.learningacademies.co.uk.

Our website is 'open to all,' with no membership/sign-in required. General visitors to Our site (i.e. those not making a booking) will receive three types of third party cookie on their computer or device. Third party Cookies are those placed by websites, services, and/or parties other than us. We use third party Cookies on Our Site for displaying video and tracking visitors to our site using Google Analytics. We also use an app called Tawk.to which enables you us to track visitors to our site and, if you wish, it enables you to chat to us via a pop up 'chat box'. All Cookies used by and on Our Site are used in accordance with current UK and EU Cookie Law.

You may, if you wish, deny consent to the placing of Cookies; however certain features of Our Site may not function fully or as intended.

What Data Do We Collect in Relation To the iAchieve Programme and Why?

We collect information about you when you and your student when you complete the online iAchieve Extra Tuition booking form or when a referral to the programme is made by a school. We also collect information when you voluntarily provide feedback and evaluations of the services you have received. The iAchieve Extra Tuition Booking form enables us to collect the following essential information:

Personal Information (Special Category Personal Information)	
Booking Form Information	
Your full name and address, phone number (landline and mobile) and email address.	This is essential for setting you up as a customer on our database and associated book keeping/processing software. Your details enable us to enter into a partnership in regards to purchasing tuition. It also enables us to contact you in regards to the tuition you are purchasing. We will use your email address to confirm your booking and to communicate with you in regards to the on-going delivery of the tuition service you are purchasing.
Confirmation of your student's address.	This is important as some customers are booking on behalf of grandchildren etc. We will use the student's address in the case of emergencies etc. This information is stored on our secure Student Central Database and access is restricted to only those managing the programme and Lead Tutors working with your student.
Your relationship to the student.	This enables us to communicate effectively to you and ensure we have the correct details in regards to the child's parent/carer.
Student's full name	This enables us to identify your child and to register them for specific, individualised learning subscriptions to enhance and accelerate their progress. Your child's name is used to deliver the programme effectively and will be included on, for example, the Centre Register – in order that we can track attendance and offer replacement sessions when a session is missed.
Student's gender	This is relevant in so far as it enables us to communicate with the correct personal pronouns in relation to your child, prior to their attendance on the programme.
Student's date of birth and current school year.	This is relevant when planning targets for your child's tuition. It enables us to use age specific assessment tools to support your student. It also enables us to be aware of the student's 'educational life cycle' and to support effectively at times of transition.
Key Area of Focus	This tells us the area you would like our tutors to focus on for the purpose of their tuition. We are then able to plan effectively. This information is added to the Central Database and shared with your student's tutor.
Medical Information	This information enables us to ensure a safe working environment for your child. It enables us to be informed in the event of an incident or emergency. These details are stored on the Central Database and access is restricted only to those involved in the delivery and administration of your child's tuition.
Additional Emergency Contact Details	We ask for an additional emergency contact so that we are able to contact a key carer/parent in the event of an emergency. We will always try and contact the primary customer first. These details are stored on the Central Database and access is restricted only to those involved in the delivery and administration of your child's tuition.
Photo Permission	This provides you with a chance to agree or disagree to your student's images being used in promotional/marketing materials including social media. You have the chance to allow or restrict our use of these images. Agreement to use your student's images is not pre-requisite for acceptance onto the iAchieve Programme.
Teacher Feedback	

Teacher Feedback Form	If you choose to share a Teacher Feedback Form with your student's class teacher then we will store the targets and information shared on our Central Register to enable your student's tutor to access the information required to perform their tasks.
Assessment Data	
Tutor Notes	Tutors record progress and activities completed in a range of formats, dependent on platforms used. We use this information to plan the next session's work and to track and monitor progress on the programme.
Photographs/Videos/Testimonials	
Images/Quotations	These will only be used where you have given your explicit permission for us to do so.

What Data Do We Collect in Relation to the iAspire Programme and Why?

The table below shows the information collected as part of the iAspire Programme. This information is collated via the Referral Form, student questionnaire and during the ongoing delivery of the programme. This information is stored in a secure, student specific file online. Access to this file is restricted only to those directly involved in your student's iAspire Programme. This includes the Education Director, Tutors and project specific administrators.

Personal Information (Special Category Personal Information)	
Referral Form Information	
Referrer Contact Details.	These are essential for communicating with you in regards to your referral and for the general processing and administration of your referral.
Student Details (name, school, year group, gender).	This information is relevant in so far as it enables us to communicate with the correct personal pronouns in relation to your student. It helps us to plan an effective and informed assessment meeting. It also allows us to provide feedback to you if and when your student is accepted onto the programme.
Reason for Referral.	This is important it enables us to begin forming a good understanding of the student in hand. Knowing this enables us to deliver an effective and appropriate assessment (and, where appropriate, subsequent programme).
The type of intervention required and student availability.	This is important it enables us to begin forming a good understanding of the student and, in particular, your thoughts in regards to most appropriate study locations/times. Knowing this enables us to plan an effective and appropriate assessment (and, where appropriate, subsequent programme).
Student behaviour at home and school. Attendance levels, academic abilities, confidence, resilience and interpersonal skills.	This information helps us to understand your perception of the student and to better understand their needs and situation. This information is reviewed alongside the young person's own perceptions to gain as complete an understanding as possible.
Risk Factors	It is important for us to be aware of any risk factors associated with the student and/or their living environment to ensure that the staff attending assessments and offering tuition can do so safely and with full regards to any control measures that should be taken.
Student Questionnaire	
Name	This is essential for communicating with you in regards to your referral and for the ongoing administration and delivery of the iAspire Programme.
Personal assessment of Skills, interests, favourite subjects, behaviour, attendance, confidence and resilience.	This information helps us to understand the perceptions of the student and to better understand their needs and situation. This information is reviewed alongside the referrer's perceptions to gain as complete an understanding as possible.
Preparedness to work	By understanding the student's motivation to participate we are able to gauge the relevance of the programme to the student.
Rewards, motivators and obstacles	By understanding the motivators and obstacles to learning we are able to plan an effective tuition programme and remove as many potential obstacles as possible.
Ongoing Tutor Feedback	
Tutor Notes	Tutors record progress and activities completed in a range of formats, dependent on platforms used. We use this information to plan the next session's work and to review and monitor progress.

What Data Do We Collect (and Why) From Our Tutor and Team Members?

Personal Information (Special Category Personal Information)	
Application Forms and CVs	
Personal details on Application Form and CV	Essential to ensure safe recruitment. Application Forms are thorough and enable us to recruit effectively, safely and knowledgeably. These are stored only during the recruitment process, with documentation relating to unsuccessful candidates being shredded post recruitment. The application forms of successful candidates are kept on personnel records for the duration of the tutor's time with the company.
Pre-Recruitment Checks	
Checks on eligibility to work in the UK.	We collect data in accordance with HM Guidance on pre-employment checks. This involves the sighting of original documents such as passports. The data checked is noted securely on our Tutor Record Database if the candidate is appointed.
DBS Checks and verification of original documents	When collect key identification details in accordance with DBS requirements. We do this in order to verify identity. All original certificates are given to the relevant tutor and remain in their personal possession. We record the certificate number of cleared certificates, the level of check and date of check on the Tutor Record Database.
References	We ask for the details pertaining to two referees and request that the candidate confirms that they have the permission of the referees to pass on their details to us.
Ongoing Data	
Emergency Contacts	This enables us to contact the tutor's preferred family/friend member in the case of an emergency.
Training and CPD Information	We are required to keep a single central register of key training information that will be shared with partner schools. This includes DBS numbers, safeguarding training, first aid qualifications and other relevant training.

WHAT IS THE LEGAL BASIS FOR OUR PROCESSING OF YOUR PERSONAL DATA?

We collect and use you information in accordance with the GDPR legal basis as defined in Article 6 and Article 9 below:

Article 6 Lawful Processing

Processing shall be lawful only if and to what extent that the below requirements apply:

The individual whom the personal data is about has consented to the processing, or in the case of a child the parent/guardian has given consent.

The processing is necessary: in relation to a contract which the individual has entered into; or because the individual has asked for something to be done so they can enter into a contract.

Article 9 Lawful Processing

Explicit consent of the data subject [or in the case of the child, the parent/guardian has given consent] see consent form.

HOW DO WE USE YOUR DATA?

All personal data is processed and stored securely, for no longer than is necessary in light of the reason(s) for which it was first collected. We will comply fully with Our obligations and safeguard your rights under the GDPR at all times. For more details on security see below.

Our use of your personal data will always have a lawful basis. In the case of iAspire and iAchieve, we use your data in accordance with the reasons outlined on the tables above. Namely, in order to offer you a first rate tuition service. Specifically, We may use your data for the following purposes:

- Supplying Our services to you (please note that We require your personal data in order to enter into a contract with you);
- Personalising and tailoring Our service to our customers;
- Replying to emails from you;
- Supplying you with emails that you have opted into (you may unsubscribe or opt-out at any time by emailing info@learningacademies.co.uk).
- Monitoring and evaluating the effectiveness of our services.
- With your permission and/or where permitted by law, We may also use your data for marketing purposes which may include contacting you by email, telephone, text message and/or post with information, news, and offers on

Our tuition services. We will not, however, send you any unsolicited marketing or spam and will take all reasonable steps to ensure that We fully protect your rights and comply with Our obligations under the GDPR and the Privacy and Electronic Communications (EC Directive) Regulations 2003.

- Confirming tutor training details with partner schools.

HOW WE ENABLE YOU TO WITHDRAW CONSENT.

You have the right to withdraw your consent to Us using your personal data at any time, and to request that We delete it. To withdraw your consent you should email info@learningacademies.co.uk.

HOW LONG WILL WE KEEP YOUR DATA?

We do not keep your personal data for any longer than is necessary in light of the reason(s) for which it was first collected. Data will therefore be retained for the following periods (or its retention will be determined on the following bases):

- When a student leaves a Learning Academies tuition programme a closing statement is raised. Once any outstanding fees have been received and or any overpayments returned, we will officially close your contract with us.
- All data relating to your tuition programme will be fully deleted at the point of closure.
- We do not retain data (other than records of financial past payments) post tuition.
- In exceptional circumstances, at your request, we will retain your data in such circumstances as you envisage a return to tuition. If, after a period of one year, you have not returned your data will be deleted.
- Where you have given us express permission to use photographs/video images/testimonials for marketing and promotion, these images will remain in our secure photo library until such time as permission is withdrawn. When they are no longer required they will be securely deleted.

HOW AND WHERE DO WE STORE YOUR DATA?

We only keep your personal data for as long as We need to in order to use it as described above and/or for as long as We have your permission to keep it.

No data is stored on our website (with the exception of the cookies aforementioned).

At the time of booking on the iAchieve Programme a secure, password protected excel file is generated and sent directly to Learning Academies Ltd. We transfer this information to our central Student Database. This is stored securely in electronic format only and is accessed only by password. Our iAspire Referral Form is linked directly to our secure Google Drive.

All data is stored in the Cloud, using a secure Learning Academies Google Drive. Google confirm the importance of the European Commission's Data Protection Directive, passed by the European Union (EU) in 1995. This restricts the movement of data from the EU to non-EU countries that do not meet the EU's "adequacy" standard for privacy protection. Processing personal data strictly within the EU is one means of compliance with the Directive.

Some or all of your data stored securely on the Google Drive may be stored outside of the European Economic Area ("the EEA") (The EEA consists of all EU member states, plus Norway, Iceland, and Liechtenstein). You are deemed to accept and agree to this by using Our Site and submitting information to Us. If We do store data outside the EEA, We will take all reasonable steps to ensure that your data is treated as safely and securely as it would be within the UK and under the GDPR.

HOW DO WE KEEP YOUR DATA SAFE?

At Learning Academies we take the safe collection and handling of your data very seriously. We have many safeguards in place to prevent personal information about you, and your family, from being lost and to prevent cyber-attacks, phishing, or other malicious activity.

Secure Booking Form Data provided by customers via the iAchieve Booking Form is not stored, at anytime, on our website. It is sent, automatically, upon completion to Head Office and the relevant Education Director in a secure, password protected, Excel File.

Receiving Email Accounts The email account to which your data is sent is secure. It is password protected and, in addition, the hardware used to access the email is also password protected. No data is stored on memory sticks.

System Backups We use the latest technology to provide reliable access to your data and have processes to back up all data on a regular basis. All Learning Academies Back Up systems are secure.

Accidental Deletions Our secure time capsule backups are designed to enable us to retrieve any key details that may have been accidentally deleted.

Payment information All payments at Learning Academies are processed via Go Cardless and/or Eventbrite - both of which organisations have been specifically selected for their excellent security and data handling processes. For further information relating to payments, please see the relevant section under your preferred tuition programme.

Needs Only Basis We only share your data with those who need it and only with those organisations and individuals we fully trust and, without whom, we would be unable to provide you with an effective service.

WHO MIGHT WE SHARE YOUR DATA WITH?

We will share your data only with third parties directly involved in the effective delivery, management or administration of the service you are purchasing. In the case of personal data held in regards to staff and team members (including tutors) we will similarly share your data only on restricted basis with those for whom access is considered essential. (E.g. Partner schools will require evidence of if we are working in partnership with your school. We recognise that, in exceptional circumstances, We may be legally required to share certain data held by Us, which may include your personal data, for example, where We are involved in legal proceedings, where We are complying with legal obligations, a court order, or a governmental authority. Where we share data we will do so only when we are confident that the receiving organisation is fully compliant with the GDPR.

iAchieve and iAspire Third Parties include: Learning Academies Ltd Head Office, Learning Academies tutors, Xero and Directli (for the purpose of book keeping), our approved accountant, education subscription providers – specifically selected to provide resources that enhance student learning.

In addition, we note that there may be times when may wish to compile statistics about the use of Our Site including data on traffic, usage patterns, user numbers, sales, and other information. All such data will be anonymised and will not include any personally identifying data, or any anonymised data that can be combined with other data and used to identify you. We may from time to time share such data with third parties such as prospective investors, affiliates, partners, and advertisers. Data will only be shared and used within the bounds of the law.

WHAT HAPPENS IF OUR BUSINESS CHANGE HANDS?

We may, from time to time, expand or reduce Our business and this may involve the sale and/or the transfer of control of all or part of Our business. Any personal data that you have provided will, where it is relevant to any part of Our business that is being transferred, be transferred along with that part and the new owner or newly controlling party will, under the terms of this Privacy Policy, be permitted to use that data only for the same purposes for which it was originally collected by Us.

HOW CAN YOU CONTROL YOUR DATA?

When you submit personal data via Our Site, you may be given options to restrict Our use of your data. In particular, We aim to give you strong controls on Our use of your data for direct marketing purposes (including the ability to opt-out of receiving emails from Us which you may do by unsubscribing using the links provided in Our emails and at the point of providing your details). We will never send you 'general marketing' and commit to sending only information and opportunities that are relevant to the tuition service you access.

You may also wish to sign up to one or more of the preference services operating in the UK: The Telephone Preference Service ("the TPS"), the Corporate Telephone Preference Service ("the CTPS"), and the Mailing Preference Service ("the MPS"). These may help to prevent you receiving unsolicited marketing. Please note, however, that these services will not prevent you from receiving marketing communications that you have consented to receiving.

YOUR RIGHT TO WITHHOLD INFORMATION

You may access Our Site without providing any data at all. (With the exception of our password protected tutor portal). However, in order to make a booking you will be required to submit or allow for the collection of certain data, without which we would be unable to offer a safe and effective tutoring service.

HOW CAN YOU ACCESS YOUR DATA?

You have the right to ask for a copy of any of your personal data held by Us (where such data is held). In accordance with GDPR, no fee is payable and We will provide any and all information in response to your request free of charge. Please contact Us at info@learningacademies.co.uk.

HOW CAN YOU CONTACT US?

If you have any questions about Our Site or this Privacy Policy, please contact Us by email at info@learningacademies.co.uk by telephone on 0845 3631342 or by post at Academy House, 39 Hazel Close, Thorrington, Essex. Please ensure that your query is clear, particularly if it is a request for information about the data We hold about you.

WHAT IF WE WANT TO CHANGE OUR USE OF YOUR DATA?

If we need to use your personal data for a new purpose, not covered by this Privacy Policy, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.



Policy Renewal Framework

This policy is reviewed on an ANNUAL basis.

The annual review month for this policy is

February