

Oakley Tutors

Privacy Policy

Introduction

Your privacy is important to us. This privacy policy explains how we maintain the privacy of your personal data and explains your legal rights and our legal obligations in accordance with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2018 (collectively, the “GDPR Regulations”).

It explains what information we collect about you, the lawful basis and purpose for which we collect the information, how we use your information and protect its privacy and under what circumstances we disclose it. This notice also provides further information on your rights under GDPR and the actions you can take to address any concerns you may have. Please read it carefully. If we update this policy, we will post any changes on our website.

Who are we?

In this policy, “we”, “our” or “us” refers to Oakley Square Ltd. The legal information for which is:

Oakley Square Ltd, website at www.oakleytutors.com registered in England and Wales.

We provide tuition services as a principal (i.e. using our own employees) to certain clients through our education consultancy and we provide tuition services as an agent (i.e. using self-employed tutors) to certain clients through our tuition agency.

For the purposes of the GDPR Regulations, we are the data controller. We are registered on the Information Commissioner’s Office (ICO) data protection register (as a data controller) with entry URL <https://ico.org.uk/ESDWebPages/Entry/ZA788776>.

What information do we collect about you?

We collect personal data about students, their parents, legal guardians or other persons that arrange for tuition on their behalf (i.e. clients), tutors that wish to provide tuition on our behalf, and our staff. The information collected may include:

Information typically collected	Clients	Students	Tutors	Staff
Relevant personal details	Yes	Yes	Yes	Yes
Contact Details	Yes		Yes	Yes
Bank account information	Varies		Yes	Yes
Date of birth		Yes		
School information, incl. subjects		Yes		
Interests, hobbies, learning likes and dislikes		Yes		
Special requirements, e.g. SEN / EHCP		Yes		
Tuition lesson reports		Yes	Yes	Yes
CVs, cover letters and interview notes			Yes	Yes
References and academic certificates			Yes	Yes
Criminal records background checks			Yes	Yes
Test results of nasen SEN training course			Yes	Yes

Note that the GDPR Regulations have additional requirements in place that must be met in order to store personal data relating to criminal records background checks (specifically in our case, an Enhanced Disclosure & Barring Service (DBS) Certificate). We are entitled to request and store this personal data as we are supplying tuition services to children and, in certain cases, to vulnerable adults with special educational needs (SEN). We also require our tutors to register for the DBS update service and provide us with permission to use the update service to check that their Enhanced DBS Certificates remain valid.

How do we collect this information?

We may collect and process information you give us (or certain third party service providers), for instance by filling in online forms, by contacting us by phone (calls made to and from our business phone line are recorded for internal monitoring purposes), email, online chat or otherwise, by providing us with information during a consultation.

In the event that you apply for a job with us or to represent us as a tutor, we will require detailed information about you in order to make sure that you are suitable for the role and to comply with our

Safeguarding and Child Protection Policy – information will be gathered by way of a face-to-face interview, provided by you, and, with your permission, provided by third parties..

In addition, when you visit our website we may automatically collect technical information including the Internet Protocol (IP) address used to connect your computer to the internet, and information about your site visit.

On what basis do we use your information?

Our lawful basis for processing your data is contractual. We use the information we collect from you for a variety of purposes, including to provide you with the tuition services or with an introduction to provide tuition services (or to provide you with a consultation in connection with providing you with such services), to provide you with information by post, email, telephone, SMS or otherwise about those services and to notify you about changes to our services. We also process personal information to maintain our accounts and records and to support and manage our employees and the tutors that agree to represent us as independent self-employed tutors under a Contract for Services.

We may also use your information to notify you about news, events and other updates we consider may be of interest to you where you have opted in to receive such communications (and have not notified us of your intention to withdraw your consent).

Where we store your personal data

We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Your financial information (where applicable, for example with respect to clients, if you are a direct debit client), together with most other client and tutor personal information is stored using our secure management information system.

Tutors cannot see the personal details of the clients or students and clients cannot see the personal details of tutors.

Disclosure of your information

We share certain personal data about the student as well as the client's contact information with the tutor(s) and / or staff that we think would be suitable for your assignment. Where information is considered sensitive, for example, information shared with us from a student's Education, Health and Care Plan (EHCP), we will specifically seek your permission before sharing it with a tutor. In all other cases, we will share information that we feel is relevant to helping the tutor provide the tuition services, unless you request otherwise. Each tutor signs a Contract for Services with us which requires them to maintain the confidentiality and security of any information shared with them about the client and / or student and any information gathered by them in the course of providing tuition. Tutors agree not to disclose such information to a third party, other than as required by law, court order or any governmental or regulatory authority, or in terms of our Safeguarding and Child Protection Policy.

We also provide information about tutors and / or staff to clients to help them determine whether they would like to proceed with a particular tutor / staff member for tuition. Clients are required to maintain the confidentiality of this information in accordance with the terms and conditions that they agree to in using our services and not disclose the information to any third party, other than as required by law, court order or any governmental or regulatory authority, or in terms of our Safeguarding and Child Protection Policy.

We will never sell, trade, or disclose any personal information to any third party (other than to any of our service providers, and only to the extent necessary to provide such service and in cases where we are satisfied with their privacy policies and procedures), other than as required by law, court order or any governmental or regulatory authority, or in terms of our Safeguarding and Child Protection Policy. Third party service providers also have in place their own privacy policies, which prevents them from selling, trading or renting your personal information to others. These can be read at:

<https://www.wix.com/about/privacy>

We confirm that we do not transfer personal data outside of the European Union.

Our retention of your information

We retain client information for a period of 4 years after tuition services have ceased – this helps us to maintain a record of all client's that have joined us as members and are therefore entitled to introductions to tutors at no further registration fee. We retain student information until the student turns 26 years' old (this is to enable us to retain information on students that may be covered under the Special educational needs and disability code of practice: 0 to 25 years'). We retain tutor information for a period of 5 years after the tutor has ceased to tutor for us. We retain staff data for a period of 3 years after the staff member has ceased to work for us.

Your rights as a data subject

The GDPR Regulation's provide data subjects certain rights relating to the processing of their personal data. Given the nature of personal data processed by us, and the lawful basis we have identified for doing so you have the following rights:

- You may request from us access to the personal data we process concerning you through making a subject access request.
- You may request rectification of the personal data we process concerning you where it is incomplete or inaccurate.
- You may request, subject to certain criteria, the erasure of the personal data we process concerning you (note that this may impact the services we provide, and where you have provided any tuition as a tutor on our behalf, we may not be able to remove certain information we hold about you as evidence of our verification of your suitability to be a tutor, other than in accordance with the Contract for Services you signed with us).
- You may request that we restrict the processing of personal data concerning you. Restriction means that we will only store the personal data and not further process it.

- You have the right to data portability whereby we will provide you (or another data controller where technically feasible) your personal data in a structured, commonly used and machine-readable format.

You can make a request expressing your rights by contacting us via email at contact@oakleytutors.com

Please note that while we will endeavour to make the updates as promptly as possible, communications may be sent using the original details until the changes have been processed.

Lodging a complaint with the Information Commissioner's Office

If you feel that your personal data has been, or is being, processed in an inappropriate manner or you feel that your rights as described above have been infringed, you may lodge a complaint with the Information Commissioner's Office (ICO). The ICO is the UK's supervisory authority regarding data protection matters and has a responsibility to act on complaints made to it. You may lodge a complaint by visiting their website <https://ico.org.uk/concerns/> or by calling the ICO's helpline on 0303 123 1113.

Social media and other websites

Where we provide links to websites of other organisations, this privacy notice does not cover how that organisation processes personal information. We encourage you to read the privacy notices on the other websites you visit. We also encourage you to consult the guides provided on the ICO's website with respect to protecting your privacy when using popular social media sites i.e.

<https://ico.org.uk/your-data-matters/be-data-aware/social-media-privacy-settings>