Career Tree

Privacy & Data Protection Policy 2020 -21

Includes Privacy & Data Protection Policy for Schools & Students

Includes Privacy & Data Protection Policy for Tutors

Owner	Privacy and Data Protection Policy
Review and approval date	October 2020
Date of next review	May 2021
Document Status	IN USE

POLICY STATEMENT

Career Tree is committed to protecting the rights and freedoms of data subjects and safely and securely processing their data in accordance with all of our legal obligations. This policy sets out our accountabilities, obligations and approach to the use of personal data in our work.

We hold personal data about our employees, clients, learners, suppliers and other individuals for a variety of business purposes.

This policy sets out how we seek to protect personal data and ensure that all staff understand the rules governing their use of the personal data to which they have access in the course of their work. In particular, this policy requires staff to ensure that the Data Protection Officer (DPO) be consulted before any significant new data collection/processing activity is initiated to ensure that relevant compliance steps are addressed.

Career Tree is committed through its policy and procedures to ensure that it:

- Complies with the General Data Protection Regulations and good practice
- Protects the rights of staff, customers, suppliers and Directors ("data subjects") in respect of their personal data. Staff should refer also to the *Employee Data Protection Policy*.
- Is open and honest about how stores, processes, uses and disposes of individual's data
- Provides training and support for staff who handle personal data so they can deal with it confidently and consistently
- Protects itself from the risks of a data breach or data theft

This policy has been aligned to the following guidance, legislation, and/or external quality assurance frameworks:

i. The Data Protection Act (1998)
ii. EU Regulation 2016/679 General Data Protection Regulation ("GDPR")

AIMS OF THE POLICY

- To ensure Career Tree meets the GDPR requirements for data processing, control, permission, sharing, access and retention.
- To ensure that all Career Tree staff understand their role within data protection and adhere to the requirements of GDPR within their role.

DEFINITIONS

Business purposes	The purposes for which personal data may be used by us: Personnel, administrative, financial, regulatory, payroll and business development purposes. *Business purposes include the following:* - *Compliance with our legal, regulatory and corporate governance obligations and good practice* - *Gathering information as part of investigations by regulatory bodies or in connection with legal proceedings or requests* - *Ensuring business policies are adhered to (such as policies covering email and internet use)* - *Operational reasons, such as recording transactions, training and quality control, ensuring the confidentiality of commercially sensitive information, security vetting, credit scoring and checking* - *Investigating complaints* - *Checking references, ensuring safe working practices, monitoring and managing staff access to systems and facilities and staff absences, administration and assessments* - *Monitoring staff conduct, disciplinary matters* - *Marketing our business* - *Improving services*
Personal data	'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. *Personal data we gather may include: individuals' phone number, email address, home address, parent/guardian name and address, employer name and address, unique learner/staff/client number, educational background, financial and pay details (including bank details), details of certificates and other documentary evidence of qualifications, education and skills, marital status, gender, nationality, next of kin, job title, and CV.*
Special categories of personal data	Special categories of data include information about an individual's racial or ethnic origin, political opinions, religious or similar beliefs, trade union membership (or non-membership), physical or mental health or condition, criminal offences, or related proceedings, and genetic and biometric information —any use of special categories of personal data should be strictly controlled in accordance with this policy.

	Special categories of personal data we gather may include: racial or ethnic origin, physical or mental health condition, and criminal offences (or related proceedings).
Data controller	A controller determines the purposes and means of processing personal data.
Data processor	A processor is responsible for processing personal data on behalf of a controller. Career Tree is a data processor.
Processing	'Processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.
Supervisory authority	This is the national body responsible for data protection. The supervisory authority for our organisation is the Information Commissioners Office.

SCOPE

This policy applies to all staff of Career Tree, who must be familiar with this policy, what it means in relation to their role, including their obligations and responsibilities under GDPR and comply with its terms.

This policy supplements our other policies relating to internet and email use. We may supplement or amend this policy by additional policies and guidelines from time to time. Any new or modified policy will be circulated to staff and full training provided, before being adopted.

WHO IS RESPONSIBLE FOR THIS POLICY?

As our Data Protection Officer (DPO), [Stephen Hurren] from Buletproof Cyber Limited has overall responsibility for the day-to-day implementation of this policy. You should contact the DPO for further information about this policy as necessary.

Bulletproof Cyber Limited:
Unit J, Gateway 1000,
Whittle Way, Stevenage, Herts, SG1 2FP
Tel: 01438 300552
Website: https://www.bulletproof.co.uk
Email: consulting@bulletproof.co.uk

1. Introduction & Procedures

1.1. As a centre for Career guidance, mentoring & tutoring, much of Career Tree's work is concerned with information and its use. For both guidance and administrative purposes, a lot of this information will relate to living persons – it is their personal data. Career Tree needs to collect and keep personal data about its students to allow it to operate effectively and efficiently, for example to register students,

monitor performance, to assure health and safety and to monitor equal opportunities.

1.2. To comply with the law, such personal data must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. The principles to ensure that personal data is processed properly, and which Career Tree follow to ensure it complies with the legislation, are set out in the General Data Protection Regulations (the GDPR), available on the Information Commissioner's Office website (www.ico.gov.uk).

Under the GDPR, personal data shall:

1.2.1. be processed fairly and lawfully (Lawful, fair, transparent)

1.2.2. be obtained for a stated purpose(s) and not processed for anything other than the stated purpose(s) and for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes (limited for its purpose)

1.2.3. be adequate, relevant and not excessive for the purpose for which it was obtained (data minimisation)

1.2.4. be accurate and be kept up to date, and if inaccurate be rectified or erased without delay (accurate)

1.2.5. except where anonymised so that the individual cannot be identified, shall not be kept for longer than is necessary for the purpose for which it was obtained (retention)

1.2.6. be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (integrity and confidentiality)

1.3. Career Tree will ensure that these principles are always followed. Therefore, through appropriate management and strict application of criteria and controls, Career Tree will process your data only as set out in this policy and the Career Tree Privacy Notice.

2. Your rights

2.1. The GDPR provides the following rights for individuals:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

2.2. Further information on how these rights can be found here: https://ico.org.uk/fororganisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

3. How we use your data

3.1. Career Tree may use and process personal data (including Special Category and criminal offence data) or information regarding you whilst you are with Career Tree and after you have left Career Tree. Special Category data includes information held by Career Tree as to your physical or mental health or condition, your racial/ethnic origin, sexual orientation/sex-life, political views, or religion. Criminal offence data includes information on the commission or alleged commission of any offence by you and any proceedings for an offence committed or alleged to have been committed by you (including the outcome or sentence in such proceedings).

3.2. We may obtain the following categories of personal data from third-parties:-

- Identifying data e.g. usernames, names, email addresses
- Tracking data e.g. attendance records taken by contractor lecturers
- Financial data e.g. payment and student finance data collected by contractor finance staff
- Medical and health e.g. sick notes

3.3. Career Tree processes your data, including Special Category Data for the purposes and in the manner set out in this Privacy Notice. The processing of your personal data for the below purposes is required for the performance of this contract between you and Career Tree, for Career Tree to meet its regulatory obligations, and for Career Tree's legitimate interests including marketing, quality assurance, and ensuring safety and security of staff and students. We may also ask for your consent for participation in some marketing activities (e.g. subscribing to marketing information along with our newsletter). If so, you have the right to withdraw such consent at any time.

3.4. The purposes for which Career Tree may process your personal data (including Special Category data) include:

- the provision of Career Tree services and facilities to you and the protection of your health, safety and welfare whilst at Career Tree;
- equal opportunities monitoring;
- arrangement and marketing of alumni activities;
- the provision of references about you;
- the provision of information to any regulator, government body or agency;
- for safety purposes; and
- the provision of information to the Higher Education Statistics Agency (HESA) .

3.5. Your HESA information including linked data is used for four broad purposes: public functions, administrative uses, HESA publications and Equal opportunity, research, journalism and other processing in which there is a legitimate interest. For more information see the HESA Collection Notice on http://www.hesa.ac.uk/fpn

3.6. In some circumstances your personal data will be processed by a third party on our behalf – e.g. a work placement provider, a student recruitment agency, or contractor lecturing or administrative staff. Any such processing will only be done under a GDPR compliant processor contract requiring the third-party to only process the data in accordance with our written instructions.

3.7. Your data will be received by the following categories of third-party recipients:

- regulators and funding agencies

- contractor staff
- partner course and skill providers e.g. Careers Group, Learn Direct, Trainimaster
- professional advisors e.g. our accountants, solicitors, quality assurance consultants, our DPO
- public authorities and law enforcement e.g. HESA, the police, re your information is protected.

3.11. In some circumstances, Career Tree may wish to use data in the form of photographs, or video or audio recording, of classroom situations as part of general marketing materials for example in Career Tree's annual report, prospectus or course materials. Video and audio recordings and any personal data alongside them will only be used in this way with your explicit consent, which you have the right to withdraw at any time.

3.12. If Career Tree does not process your data fairly, you may lodge a complaint with the Information Commissioners Office (ICO) here: https://ico.org.uk/concerns/handling/ within 3 months of your last contact concerning the matter with Career Tree (or such other time limit as the ICO from time to time specify).

4. Confidentiality

4.1. All information given to Career Tree staff will be treated with sensitivity, care and discretion. In most circumstances, the information students provide is treated as confidential, but members of staff may discuss aspects of student enquiry or circumstances with their immediate colleagues or in a few cases where relevant, with the Career Tree management. If such discussions take place it will usually be for the sole purpose of seeking information, confirming the best course of action, or helping the member of staff to reflect on their work with you. Whenever possible, any such discussion between Career Tree staff will take place without identification of student personally.

5. Staff responsibilities

5.1. Staff whose work involves the use of personal data are responsible for ensuring that:

- any personal data which they hold whether electronically or in hard copy is kept securely, including using password protection on computer files,
- personal data is not disclosed by them either orally or in writing, to any unauthorised third party,
- the personal data is accurate and kept up to date, held for the appropriate length of time and destroyed confidentially when/if no longer needed, and

- they do not access any personal data which is not necessary for carrying out their work.
- report any data breach to the DPO within 48 hours where feasible, to allow to the School to comply with its obligation to record all data breaches, and to report a data breach to the ICO within 72 hours.

5.2. Managers have an additional responsibility to ensure that their staff are aware of the data protection principles and know how to correctly process personal and sensitive personal data as part of their work.

6. Student responsibilities

6.1. We also collect, at registration, the contact details of a person nominated by student for emergency contact purposes. A student must notify them that we are holding this data which will only be used in an emergency.

7. Students with disabilities or dyslexia

7.1. If a student has declared a disability or dyslexia, Career Tree is legally required under the Equality Act 2010 to make appropriate and reasonable adjustments in order to help such student to participate to the fullest extent possible in the educational opportunities provided by Career Tree. Information about the student situation and requirements will be limited to that necessary to assure that appropriate adjustments can be made to help the student gain maximum benefit from their course of study. Any information will normally only be passed to others with student's agreement.

8. Subject access

8.1. Student is entitled to request a copy of the data we hold about him/her. Any person who wishes to exercise this right should complete the '*Subject Access Request'* form available from the Career Tree website and submit it to Career Tree, however a request can be made verbally or through any medium to any member of staff at Career Tree.

8.2. Career Tree will comply with requests for access to personal data as quickly as possible, but will ensure that it is provided within 28 calendar days of receipt of the request. Career Tree can extend the time to respond by a further two months if the request is complex or it has received a number of requests from the student. Career Tree will inform the student within 1 month of receiving their request and explain why the extension is necessary.

9. Retention of records

9.1. We will retain a full record for 6 (six) years after a student has left Career Tree so that we can fulfil our function of providing details and references when asked to do so. After these six years, we will keep enough data about a student to be able to confirmed participation with Career Tree.

10. Key contact details

Career Tree (Data Controller)

Career Tree Wembley Office
401- 403 High Rd, London, Wembley HA9 7AB
Tel: 020 8795 3863

Career Tree Elephant &Castle Office
70 Newington Causeway, London, England SE1 6DF
Tel: 020 8017 4257

Career Tree Luton Office
4 Dunstable Road, Luton, Bedfordshire, LU1 1DX
Tel: 015 8272 9486

Career Tree Birmingham Office
84 Bordesley Street, Birmingham, B5 5PN,
Tel: 012 1643 6774

Email (all campuses): registry@careertree.com

Bulletproof Cyber Limited (Data Protection Officer)

Bulletproof HQ, Unit J, Gateway 1000,
Whittle Way, Stevenage, Herts, SG1 2FP
01438 532 916

consulting@bulletproof.co.uk

Version History

Version	**1.0 – 3.1**	
Original author(s):	Data Protection Officer Legal Advisor	
Reviewed by:	Governing Body	September 2016 September 2017 May 2018 September 2018

Version	**3.2**	
Revised by:	Quality Audit Manager Legal Advisor	
Revision summary:	*Factual updates: Change of data protection officer; Document formatting and version control applied. Changes Reviewed by the Publications Committee.*	
Approved by:	Legal Advisor / Executive Committee	May 2020

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Career Tree privacy and data policy for schools & students

1. About Career Tree

Career Tree is a specialist career advice & guidance provider, offering tutoring, mentoring, supporting pupils from disadvantaged backgrounds to achieve a meaningful level of academic attainment, with a view to helping them progress to higher education, employment or training. We provide high-quality tutors to work with pupils, increasing their subject knowledge, confidence and study skills.

In secondary schools, Career Tree particularly focuses on supporting pupils on the grade 3-4-5 borderline in English and maths. We aim to help them achieve a grade 4 and above in maths and English GCSEs. In primary schools, we aim to help pupils work towards expected standards in maths and reading.

2. Purpose of Career Tree's Data Policy

Career Tree has a data policy in order to ensure that data is:

- recorded and used fairly and lawfully;
- used for specific, stated purposes;
- used in a way that is adequate and relevant;
- **handled according to individual's data** protection rights;
- kept safe and secure.

The policy serves to:

- make clear to schools and related parties such as parents and pupils what information may be requested and how it will be recorded and used;
- guide Career Tree employee use of data, ensuring data is being used solely for appropriate purposes;
- guide funding bodies, grant making trusts and researchers about the data Career Tree may reasonably be able to provide.

The current version of this policy is effective from 22nd May, 2020.

3. Data Purpose

Career Tree asks schools to provide data on the pupils they put forward for participation in the tutoring programme for the following reasons:

- to effectively coordinate its programme delivery in schools and online;
- to enable the monitoring and **evaluation of Career Tree's impact and improve** programme delivery;
- to enable Career Tree to share evaluation findings with schools for their own internal monitoring purposes;
- to enable Career Tree to successfully fundraise, to keep costs to schools low.

4. Data Collection

Career Tree provides schools with a data collection spreadsheet and asks schools to provide, in advance of the first scheduled tutoring session, relevant information about each pupil taking part in the programme. This may include their name, gender, date of birth, Pupil Premium status, other circumstances of disadvantage, subject ability, unique pupil reference number and any additional pupil engagement-related guidance which the school feels is important to share.

In secondary schools, Career Tree may ask schools to provide pupils' final GCSE results in both English Language, English Literature and maths.

In primary schools, Career Tree may ask schools to provide pup**ils' final SAT results in** reading, writing and maths.

Career Tree tracks pupil and tutor attendance, as well as their engagement on tutoring programmes and the academic topics they have covered during their sessions. Pupils, tutors and teachers are also invited to complete feedback surveys during the course of their engagement with Career Tree.

The privacy policy of our online tutoring platform provider, Vedamo, can be found here. Video recordings of tutoring sessions are made for the additional purpose of meeting our

safeguarding responsibilities, as well as for the monitoring and improvement of our **programme's quality and impact.**

5. Data Storage and Retention

We are committed to ensuring that any data provided by schools is stored securely. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure it, including:

- the use of a limited access and password protected database;
- suitable cyber-security safeguards and best practices;
- secure and timely destruction of any additional digital or hard-copies of sensitive data beyond that which is recorded on our database for legitimate purposes.

The initial pupil data provided by schools, alongside the additional attendance and engagement data recorded on our database during their participation with Career Tree will be pseudonymised approximately two academic years after their time on the programme ends. Video recordings of online tutoring sessions are kept for approximately one full academic term after a programme of tutoring has finished.

6. Access and sharing of data

Access to individual pupil-level data will not be open to or shared with third parties with the exception of;

- where standard pupil information (e.g. pupil name, year group, subject ability and engagement guidance from the school) is shared with tutors where relevant for tailoring their tutoring toward pupil needs. If voluntarily provided by the school, GCSE/SAT results may be shared with tutors, but only in relation to those pupils they directly supported;
- where Career Tree works closely with certain funders and consultants who provide ongoing management and consultancy support to improve our programme delivery and drive impact. Unless an agreement of confidentiality is in place, data will be anonymised.

7. Publication of data

Anonymous and aggregated data may be published on the Career Tree website and used in published **materials, such as Career Tree's annual report.**

Partner schools agree to being named as working with Career Tree.

Individual pupil-level data will not be published.

8. Consent

8.1 Schools

Career Tree asks that partner schools first **distribute the 'Career Tree Parent Letter'** (detailed below) to the parents/guardians of pupils they intend to invite onto the tutoring programme. The school must then provide the requested data for pupils participating on the programme to Career Tree in advance of the first tutoring session, and agree to it being used as detailed in this policy.

8.2 Pupils and parents

All parents/guardians should receive an 'Career Tree Parent Letter', prepared by Career Tree but distributed to them via the school, which details the way in which Career Tree and the school plan to exchange, store and use information about their child for

the purposes detailed in this policy. The letter will prompt parents/guardians to confirm **with their child's school whet**her their child takes part in the programme.

During the course of their engagement with Career Tree, pupils are invited to complete feedback surveys, which may also invite them to provide an endorsement or quotation relating to their experience of the programme. They can choose whether they wish their first name and school to be used, or whether they wish this to be fully anonymous.

9. External Impact Evaluation

Career Tree have worked with external evaluators to carry out impact evaluations, comparing the results of pupils supported by Career Tree against a control group of similar pupils who have not received Career Tree support. The control groups were constructed using the National Pupil Database (NPD). Career Tree may request unique pupil numbers (UPNs) from partner schools in order for current and future evaluators to match tutored pupils with a control group on the NPD. This data will not be used for any other purposes than those stated in this policy and will be subject to the same data protection regulations.

10. Contact

To contact us in relation to any of the information contained in Career Tree's data policy for schools, please email **admin@careertree.com.**

Career Tree privacy and data policy for Tutors

This privacy policy sets out how Career Tree uses and protects any information that you provide us with when completing an online application form to become a tutor, as well as any further information we record relating to your active tutoring with us.

Career Tree is committed to ensuring that your privacy is protected. Should we ask you to provide certain information by which you can be identified, then you can be assured that it will only be used in accordance with this privacy policy.

Career Tree may change this policy from time to time. You should check this page from time to time to ensure that you are happy with any changes. The current version of this policy is effective from **26th August 2020**.

How to get in contact

To contact us in relation to any of the information contained in this policy notice, or to pursue any of your rights your rights under the General Data Protection Regulation (further information below), please email: admin@careertree.com.

What information we record and use

We record and use the following information **only if and when you apply to tutor with us:**

- name and occupation;
- contact information including mobile number, email address and postal address;
- demographic information such as gender, date of birth, academic qualifications, experience, availability and tutoring preferences;
- indication of any convictions, cautions, reprimands or final warnings that are not "protected" as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended in 2013);
- other information directly relevant to tutor applications or tutoring in schools.

If you are successful in applying to tutor with us, we may record and use the following further information:

- your DBS status including its issue date and certificate number, and a copy of your certificate where relevant (see section on 'How we process and use DBS checks);
- your tutoring history with us, and notes on your engagement and attendance at tutoring sessions;

- content of any feedback surveys, case studies or quotes you voluntarily provide;
- pupils you have worked with and academic topics covered in your sessions.
- video recordings of any sessions you deliver online.

Why we record and use this information

Career Tree considers the information we record and use to fall within the reasonable expectations and legitimate interests of individuals who voluntarily complete our online application and go on to tutor with us. Information recorded **from when you apply to tutor with us** is primarily used to assess your suitability as a tutor in schools with the young people we specifically support, and for the following reasons:

- to meet our responsibilities in relation to child protection and safeguarding;
- to ensure we are engaging and recruiting a diverse range of tutors;
- to tailor our tutoring opportunities to your preferences and availability;
- to record your engagement on our tutoring programmes;
- to advertise location-specific tutor opportunities and logistical information to you during your tutor activities, as well as additional Career Tree related communications (detailed in following section).
- to analyse and improve our programme delivery and impact.

Further information we record or request **if you are successful in applying to tutor with us** may be used in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- record your engagement on our tutoring programmes;
- analyse and improve our programme delivery and impact.

How we process and use DBS checks

To meet our responsibilities in relation to child protection and safeguarding, it is necessary for all our tutor tutors to complete a full enhanced DBS check, of which Career Tree will cover the cost.

You will need to complete an initial online DBS application form, and then show us the necessary identification for a member of our team to complete your application. Completing the DBS application will involve providing some of your personal details to uCheck, and allowing Career Tree to take temporary copies of your ID documents, such as your passport or driving licence. These copies will be destroyed after your application is complete.

If your DBS certificate is clear, we will share your DBS certificate details with partner schools in order to meet our safeguarding responsibilities. If your DBS certificate has a caution or conviction, we will request further details from you in order to complete a risk assessment, which we will then ask you to approve as consent for us to share this information and a copy of your certificate with our partner schools.

Please note that once you have given permission for us to share details of a DBS certificate to a partner school, we cannot guarantee a school's policy to securely store the information, or only retain the details for a limited time.

How we communicate with you using this information

Career Tree may contact you via email, phone text or post.

Aside from advertising tutor opportunities and communicating logistical information to you during your tutor activities ('**core communications**'), Career Tree may periodically contact you via email with '**additional communications**' if you consent to receiving these. These could include;

- newsletters, job vacancy and education policy updates;
- information about events relevant to your tutoring, such as optional Career Tree focus groups, tutor socials or PGCE-related events (where interest is indicated in your application) or national tutoring events;
- other ways to support us, including optional donations, fundraising participation events, becoming an ambassador, developing a quote or case study on your tutoring, engaging in fundraising activities or social media;
- invitations to complete optional marketing surveys or undertake word-of-mouth promotion of Career Tree to friends or colleagues.

You are presented with a clear choice to opt-in to these additional communications in your application form. If you decide at a later date that you no longer wish to receive these additional communications, our emails include clear and easy opportunities to opt -out of these additional communications, or you can also contact us at any time via email: admin@careertree.com . You can also email us at this address if you would like no further contact from Career Tree entirely, including our core communications. Please allow five working days for us to process these requests.

After two years of inactivity, we will cease any further communication with you.

How we store, maintain and keep this information

We are committed to ensuring that your information is stored securely. In order to prevent unauthorised access or disclosure, we have put in place physical, electronic and managerial procedures to safeguard and secure it, including:

- the use of a limited access and password protected database;
- suitable cyber-security safeguards and best practices;
- secure and timely destruction of any additional digital or hard-copies of information beyond that which is recorded on our database.

Information is updated on an ongoing basis, as and when it is found to be inaccurate or when updated information is provided to us by individuals, without delay.

Information recorded at the tutor application stage and during any voluntary activities with Career Tree may be retained on a long-term basis in order to:

- meet our responsibilities in relation to child protection and safeguarding;
- maintain a record of unsuccessful applications;
- maintain a record of individual requests to restrict further use or 'processing' of their personal information, or requests for Career Tree to cease contacting them, in order to respect these requests in future;
- to ensure we don't accidentally duplicate information;
- to provide references for tutors after they have tutored with us.

The privacy policy of our online tutoring platform provider, Vedamo, can be found here. Video recordings of online tutoring sessions are kept for approximately one full academic term after a programme of tutoring has finished.

You may also be requested to access further e-learning via an online platform called Looop. Their privacy policy can be found here.

If we share this information

Career Tree may use your information in an aggregated and anonymised format in order to undertake statistical analysis or share reports with third parties.

We may share some of your personal information, in an un-anonymised format, with our partner schools, in order to coordinate tutor-pupil pairings at your tutoring sessions. If your DBS is clear, we will share your DBS certificate details with partner schools in order to meet our safeguarding responsibilities. If your DBS is flagged, we will not share any details with our partner schools without your permission (see section on 'How we process and use DBS checks').

We will not sell, distribute or lease your personal information to any other third parties unless we have your permission or are required by law to do so.

How to control your information

Career Tree is committed to accommodating your rights under the General Data Protection Regulation, which include:

- Your **right to be fully informed** on how your information is processed by Career Tree. If you have any questions about the guidance provided in this policy notice, or would like further detail on specific sections, then please address your query to the contact details provided below.
- Your **right to access** the personal information Career Tree has recorded about you. If you require a copy of the personal data Career Tree has recorded about you, please make this request using the contact details provided in this notice and the information will be provided you in an electronic format as soon as

possible, within one month at the latest. We will need to confirm your identity to provide this information.

- Your **right to rectify** the personal information Career Tree has recorded about you if it is inaccurate or incomplete. If you believe that any of the information we are holding is inaccurate or incomplete, please contact us as soon as possible using the contact details provided below. We will promptly correct any information found to be incorrect.
- Your **right to erase** the personal information Career Tree has recorded about you. You may request the deletion or removal of the personal data Career Tree has recorded about you where there is no compelling reason for it to be kept. We may need to retain some specific information recorded at the tutor application stage and during any voluntary activities with Career Tree – for examples, see section: 'How we store, maintain and keep this information'.
- Your **right to restrict or object** to the further use or 'processing' of your personal information by Career Tree. Please use the contact details provided to inform of us of any wish to restrict or object to the further use of your personal information. Note that we may need to retain some specific identifying information in order to respect your restriction or objection in future.

To contact us in relation to any of the information contained in this policy notice, to make a complaint, or to pursue any of your rights under the General Data Protection Regulation, please email: admin@careertree.com.

Or write to us at: Career Tree, Lancaster House, 70 Newington Causeway, Elephant & Castle, London SE1 6DF

Telephone: 0208 795 7636