

LUMA EDUCATION

Privacy Policy

Public-facing privacy information for learners, parents/carers, staff applicants, commissioners and website users

Document control	Details
Organisation	Care and Horizon Ltd trading as Luma Education
Company number	16692356
Registered office	1 Quality Court, London, England, WC2A 1HR
Website	www.lumaeducation.co.uk
Main telephone	020 3507 0057
Email / policy contact	hr@lumaeducation.co.uk
Policy owner	Data Protection Lead
Issue date	10 June 2026
Version	1.0
Review date	September 2026, or earlier if guidance, provision, website services or organisational arrangements change
Status	Public website policy

Plain English summary

We collect and use personal information to provide education, tuition, alternative provision, safeguarding, administration, recruitment and communication. We only use data where we have a lawful reason, keep it secure, and share it only where needed.

1. Who we are

Care and Horizon Ltd trading as Luma Education is the data controller for personal data used for our own business, education, tuition, alternative provision, website, recruitment and administration purposes.

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ICO registration	CSN5764076

2. Personal information we may collect

Category	Examples
Learner information	Name, date of birth, age, school year, academic level, attendance, assessment results, learning plans, SEND needs, EHCP information, behaviour information, progress notes and feedback.
Parent/carer information	Names, addresses, phone numbers, email addresses, emergency contacts, payment information, consent forms and communication history.
Safeguarding and welfare information	Relevant welfare concerns, safeguarding records, accident/incident records, medical needs, care plans, medication information and information shared by schools, local authorities or professionals.
AP and commissioner information	Referral forms, placement plans, risk assessments, attendance reports, review notes, school/local authority contacts and professional correspondence.
Website and enquiry information	Contact forms, IP/device data, analytics, cookies, enquiry details and communication preferences.
Staff, tutor and applicant information	Application details, employment history, references, right to work, DBS/suitability checks, qualifications, training, payroll/contact details and supervision records.
Images and marketing	Photographs, video, testimonials or success stories where appropriate consent or another lawful basis applies.

3. How we collect information

- directly from learners, parents/carers, staff, tutors, applicants and website users;
- from schools, local authorities, social workers, SENCOs, virtual schools, health professionals and other education partners;
- from assessment, attendance, tuition, AP placement and communication records;
- from publicly available or official sources where relevant to safer recruitment or due diligence;
- from website forms, cookies, analytics and communication systems.

4. Why we use personal information and lawful bases

Purpose	Typical lawful basis
Responding to enquiries, enrolment, tuition, assessment and service administration.	Contract, steps before a contract, legitimate interests and legal obligations where applicable.
Delivering alternative provision and reporting to commissioning schools/local authorities.	Contract, legitimate interests, legal obligations and safeguarding/public interest conditions where applicable.
Safeguarding, welfare, attendance, medical needs, accident records and emergency action.	Legal obligation, vital interests, legitimate interests and substantial public interest/safeguarding conditions where special category data is involved.
SEND support, reasonable adjustments and learner planning.	Contract, legitimate interests, legal obligation, substantial public interest and equality duties where applicable.
Recruitment, staff checks, DBS/suitability checks, training and HR administration.	Contract, legal obligation, legitimate interests and employment/social security obligations where applicable.
Finance, invoicing, payments, debt management, accounting and audit.	Contract, legal obligation and legitimate interests.
Marketing, images, testimonials and non-essential communications.	Consent where required, or legitimate interests where legally appropriate and with opt-out rights.
Website security, analytics and cookies.	Consent for non-essential cookies where required; legitimate interests for security and essential operation.

5. Special category and criminal offence information

Some information is more sensitive, including health, SEND, disability, ethnicity, safeguarding, welfare, DBS and criminal offence-related information. We only use this information where there is a clear need and a lawful condition applies. This may include safeguarding children, supporting vulnerable learners, meeting legal duties, making reasonable adjustments, employment checks, protecting vital interests or establishing, exercising or defending legal claims.

6. Who we may share information with

- parents/carers and authorised emergency contacts where appropriate;
- commissioning schools, local authorities, social workers, SENCOs, virtual schools and professional partners;
- children's social care, LADO, police, emergency services, NHS/medical professionals or safeguarding agencies where required;
- exam/assessment providers or education partners where relevant to the service;
- payment processors, IT providers, HR systems, professional advisers, insurers and auditors;
- regulators, courts, tribunals, government bodies or law enforcement where legally required.

We do not sell personal data.

7. How long we keep information

Information type	Typical approach
Enquiry records	Kept only as long as needed for enquiry handling, follow-up, audit or complaint purposes.
Learner and tuition records	Kept for the period needed to deliver the service, respond to queries, evidence learning and meet legal/contractual needs.
AP, safeguarding and welfare records	Kept securely for longer where required because of safeguarding, legal, regulatory, insurance or local authority requirements.
Finance records	Normally kept for at least 6 years for accounting and tax purposes.
Recruitment records for unsuccessful applicants	Kept for a limited period unless consent is given to retain details for future opportunities.

Information type	Typical approach
Staff/tutor records	Kept during engagement and for an appropriate period afterwards for legal, safeguarding, reference, payroll and audit purposes.

8. Security

- access to personal information is restricted to people who need it for their role;
- paper records are stored securely and not left unattended;
- digital records are protected through approved systems, passwords and access controls;
- staff are expected to follow confidentiality, safeguarding and data protection rules;
- data breaches must be reported internally immediately and assessed for ICO notification where required.

9. Your rights

Depending on the circumstances, individuals may have the right to request access to their data, correction, deletion, restriction, objection, data portability, withdrawal of consent and review of automated decisions. Some rights are limited where safeguarding, legal claims, child protection, education records, confidentiality of others or legal obligations apply.

To make a data protection request, contact the data protection lead using the details above. We may need to verify identity before responding.

10. Cookies, website forms and marketing

Our website may use cookies and analytics to operate the website, understand visitor use and improve services. Non-essential cookies should only be used in line with consent requirements. Website forms should only ask for information needed to respond to the enquiry or provide the requested service.

Marketing emails or messages will only be sent where there is a lawful basis. You can ask us to stop marketing communications at any time.

11. Complaints

Please contact Luma Education first if you have a concern about how we use personal information. You also have the right to complain to the Information Commissioner's Office if you are unhappy with how your data protection concern has been handled.

Approval and review

Approval item	Details
Approved by	Aiden Bayati, Director and Data Protection Lead
Issue date	10 June 2026
Next review	September 2026, or earlier if guidance, provision, website services or organisational arrangements change
Distribution	Website, parents/carers, learners, staff, tutors, commissioners and partners on request