
Data Protection Policy

Policy Owner: Directors, AdaptEd Tuition Ltd
Approved By: AdaptEd Tuition Ltd, Directors
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1. Policy Statement

AdaptEd Tuition Ltd ("we", "our", "us") is committed to protecting the privacy, confidentiality and security of all personal data entrusted to us by learners, parents, guardians, tutors, schools, Local Authorities and other stakeholders.

AdaptEd Tuition Ltd is the data controller for personal data where it determines the purposes and means of processing, including personal data processed in connection with its own tutoring services, website, online learning platforms and associated activities.

For some commissioned services, AdaptEd Tuition Ltd may act as a data processor for specified processing activities carried out on behalf of a school, Local Authority or other commissioning organisation and under its documented instructions. Controller and processor roles must be assessed by reference to the actual processing arrangements, rather than solely to the description used in a contract.

Where AdaptEd Tuition Ltd acts as a processor, a written data-processing agreement meeting the requirements of Article 28 UK GDPR must be in place before that processing begins. AdaptEd Tuition Ltd may remain a controller for other processing activities within the same engagement.

The relevant roles and responsibilities must be recorded in the commissioning documentation and reflected in the privacy information provided to affected individuals, as applicable.

This Data Protection & Privacy Policy explains how AdaptEd Tuition Ltd manages personal data and supports compliance with applicable data protection legislation.

This policy should be read alongside AdaptEd Tuition Ltd's Privacy Notice, which provides detailed information for learners, parents, guardians, tutors and website users about how personal data is collected, used and protected.

2. Purpose and Scope

This policy outlines how AdaptEd Tuition Ltd collects, uses, stores, protects and shares personal data.

This policy applies to:

- Directors
- Tutors
- Contractors
- Volunteers
- Associate professionals
- Anyone handling personal data on behalf of AdaptEd Tuition Ltd

All individuals accessing personal data on behalf of AdaptEd Tuition Ltd must follow this policy and maintain confidentiality at all times.

3. Data Protection Principles

AdaptEd Tuition Ltd ensures that personal data is processed in accordance with the UK GDPR principles.

Personal data must be:

Lawful, Fair and Transparent

Processed lawfully, fairly and transparently, with individuals informed about how their personal data is used.

Purpose Limitation

Collected for specified, explicit and legitimate purposes and not processed in a way that is incompatible with those purposes.

Data Minimisation

Limited to information necessary for providing educational services and fulfilling legal, contractual and safeguarding responsibilities.

Accuracy

Kept accurate and up to date.

Storage Limitation

Retained only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, safeguarding, regulatory and contractual obligations.

Integrity and Confidentiality

Protected against accidental loss, unauthorised access, misuse, alteration, disclosure or destruction.

Accountability

Processed in a manner that demonstrates compliance with data protection legislation.

4. Roles and Responsibilities

All directors, tutors, contractors, volunteers and authorised individuals must treat all personal information and confidential business information obtained through their work with AdaptEd Tuition Ltd as confidential. Information must only be accessed or shared where there is a legitimate business need, legal obligation or safeguarding requirement. Confidential information must not be disclosed to unauthorised persons during or after engagement with AdaptEd Tuition Ltd.

Directors

The Directors of AdaptEd Tuition Ltd are responsible for:

- Ensuring compliance with data protection legislation.
- Reviewing data protection procedures.
- Managing personal data breach responses.
- Responding to data subject requests.
- Ensuring appropriate training and guidance is provided.
- Monitoring compliance with this policy.

Tutors, Associates and Authorised Individuals

All tutors, associates and authorised individuals accessing personal data must:

- Maintain confidentiality of personal data.
- Follow data protection procedures.
- Only access information necessary to perform their role.
- Report concerns, suspected breaches or cybersecurity incidents immediately.
- Follow security requirements when handling personal data.

5. Personal Data We Collect

AdaptEd Tuition Ltd collects and processes personal data through:

Identity Data

This may include:

- Name
- Date of birth
- Title
- Gender (where provided)

Contact Data

This may include:

- Home address
- Email address
- Telephone number
- Emergency contact details

Educational Data

This may include:

- School year group
- Subject requirements
- Learning goals
- Educational assessments
- Exam results
- Academic progress information
- Photographs with separate consent
- Attendance and absence information
- Health and safety information

Special Category Data

This may include:

- Safeguarding information
- Health and welfare information
- SEND data

Financial Data

This may include:

- Payment information
- Billing details

Transaction Data

This may include:

- Payment history
- Booked lessons and services

Technical Data

This may include:

- IP address
- Browser type and version
- Device information
- Website usage information

Profile Data

This may include:

- Account information
- Feedback
- Preferences
- Survey responses

Marketing and Communications Data

This may include:

- Marketing preferences
- Communication preferences

AdaptEd Tuition Ltd may occasionally send information about services, educational resources, updates or events that may be relevant to individuals.

Individuals may opt out of marketing communications at any time by contacting AdaptEd Tuition Ltd.

Personal data will not be shared with third parties for marketing purposes without explicit consent.

Tutor Information

AdaptEd Tuition Ltd may also process information relating to tutors and associates, including:

- Contact details
- Qualifications
- Employment history

- DBS information
- References
- Safeguarding training records
- Payment information

School and Local Authority Information

AdaptEd Tuition Ltd may process:

- Referral information
- Contact details
- Placement information
- Commissioning information

6. How We Use Personal Data

AdaptEd Tuition Ltd uses personal data for legitimate educational and business purposes, including:

- Assessing tuition requirements and educational needs.
- Matching learners with suitable tutors.
- Delivering tutoring services.
- Managing bookings and lesson scheduling.
- Processing payments and invoices.
- Communicating with learners, parents, guardians, schools, Local Authorities and tutors.
- Responding to enquiries and support requests.
- Meeting legal and regulatory obligations.
- Maintaining safeguarding standards.
- Supporting quality assurance, tutor supervision and training.
- Investigating complaints or concerns.

AdaptEd Tuition Ltd does not sell personal data and does not share personal data with third parties for their own marketing purposes.

Where testimonials or reviews are used in marketing materials, permission will be obtained before publishing any identifying information.

7. How We Collect Personal Data

AdaptEd Tuition Ltd collects personal data through:

Direct interactions

Information provided by individuals when they:

- Submit an enquiry.
- Register for tuition services.
- Complete assessment forms.
- Book lessons.

- Create an online account.
- Contact AdaptEd Tuition Ltd by email, telephone or through our website.
- Complete surveys or provide feedback.

Automated technologies

When individuals use our website, AdaptEd Tuition Ltd may automatically collect technical information, including:

- IP address.
- Browser type and version.
- Device information.
- Website usage information.

This may be collected through cookies and similar technologies. When individuals first visit our website, they are provided with the option to accept or decline non-essential cookies through the cookie banner. Essential cookies, which are necessary for website operation, cannot be disabled.

8. Lawful Bases for Processing

AdaptEd Tuition Ltd processes personal data under one or more lawful bases under the UK GDPR.

The lawful basis that applies depends on the purpose of processing.

Purpose	Lawful Basis
Deliver tuition	Contract
Communicate with parents	Contract
SEND and safeguarding information	Legal obligation and/or safeguarding (public interest/vital interests where applicable)
Quality assurance	Legitimate interests
Lesson recordings	Legitimate interests or legal obligation (depending on why recorded)
Marketing emails	Consent
Payment Processing	Contract
Responding to Enquiries	Legitimate interests

Where consent is relied upon as the lawful basis for processing, individuals have the right to withdraw consent at any time.

9. Automated Decision Making and Profiling

AdaptEd Tuition Ltd does not make decisions about individuals based solely on automated processing, including profiling, where those decisions would produce legal effects or similarly significant effects.

All decisions relating to admissions, tutor matching, safeguarding, educational support and the provision of services involve human review, professional judgement and oversight.

10. Special Category Data

AdaptEd Tuition Ltd may process special category personal data where necessary to:

- Safeguard children.
- Provide appropriate educational support.
- Meet legal obligations.
- Protect the vital interests of learners.

Special category data may include:

- Safeguarding information.
- Health and welfare information.
- SEND data.
- Mental health and wellbeing information.

Special category data is processed only where necessary and appropriate safeguards are applied.

AdaptEd Tuition Ltd relies on the relevant conditions under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018 where required.

Access to special category data is restricted to authorised individuals who require the information to fulfil their responsibilities.

11. Children's Data

As an educational provider, AdaptEd Tuition Ltd processes personal data relating to children.

Where appropriate, information is collected and managed through parents or legal guardians.

AdaptEd Tuition Ltd takes additional care to ensure that children's personal data is handled responsibly, securely and transparently.

Where appropriate, privacy information will be provided to children in age-appropriate language so that they understand how their information is used.

AdaptEd Tuition Ltd only collects information necessary to:

- Provide educational services.
- Maintain safeguarding standards.
- Meet legal and regulatory responsibilities.

12. Information Sharing

AdaptEd Tuition Ltd will only share personal data where necessary, appropriate and lawful, including to deliver services, meet legal and regulatory obligations, safeguard learners, investigate complaints or concerns, and obtain professional advice.

Tutors, approved substitutes and other authorised individuals handling personal data on AdaptEd Tuition Ltd's behalf must comply with applicable documented instructions, confidentiality obligations and security requirements. Access must be limited to the information necessary for their role.

Service providers processing personal data on AdaptEd Tuition Ltd's behalf must be assessed for appropriate security measures. Where a provider acts as a processor, a written data-processing agreement meeting the requirements of Article 28 UK GDPR must be in place.

Where AdaptEd Tuition Ltd acts as a processor for a commissioning organisation, any further sharing or engagement of sub-processors must comply with the agreed processing instructions, applicable authorisation requirements and data protection law.

Some recipients, including schools, Local Authorities, professional advisers, regulators and safeguarding agencies, may act as independent controllers for the personal data they receive.

Personal data may be shared with trusted third parties, including:

Educational Services

- Tutors providing educational services on behalf of AdaptEd Tuition.

Online Teaching Platforms

AdaptEd Tuition Ltd may use:

- Pencil Spaces via Tutorcruncher
- Google Meets
- Microsoft Teams
- Zoom

Payment Providers

AdaptEd Tuition Ltd may use:

- Stripe
- Bank Transfer

Booking and Management Systems

AdaptEd Tuition Ltd uses Tutorcruncher as a booking and management system.

IT and Website Providers

Information may be shared with:

- Website hosting providers
- Email service providers
- Cloud storage providers
- IT support providers

Safeguarding Agencies

- Where necessary and lawful, AdaptEd Tuition Ltd may share relevant personal data with safeguarding agencies, children's social care services, the police and other appropriate authorities to protect learners or others from harm.

Professional Advisers

Where necessary, information may be shared with:

- Accountants
- Insurers
- Solicitors
- Regulatory authorities
- Schools
- Local Authorities
- Other professional advisers where legally required

Personal data shared with these recipients must be limited to what is necessary for the relevant purpose. Sharing must comply with applicable data protection requirements, including additional conditions and safeguards where special category or criminal offence data is involved.

AdaptEd Tuition Ltd will never sell personal data to third parties.

13. International Transfers

AdaptEd Tuition Ltd aims to store and process personal data within the United Kingdom.

Where personal data is transferred outside the UK, AdaptEd Tuition Ltd will ensure that an appropriate safeguard is in place, such as:

- An International Data Transfer Agreement (IDTA).
- The UK Addendum to the EU Standard Contractual Clauses.
- Another lawful transfer mechanism recognised under UK GDPR.

AdaptEd Tuition Ltd will ensure that personal data remains protected when transferred internationally.

14. Data Security & Cybersecurity

AdaptEd Tuition Ltd is committed to protecting personal data against accidental loss, unauthorised access, misuse, alteration, disclosure or destruction.

We recognise the importance of maintaining strong cybersecurity practices to protect the personal data of learners, parents, guardians, tutors, staff and website users.

We maintain appropriate technical and organisational measures designed to ensure the confidentiality, integrity and availability of personal data.

Access Controls

AdaptEd Tuition Ltd ensures that:

- Access to personal data is limited to authorised individuals who require it to perform their role.
- User permissions are reviewed regularly.
- Access rights are amended or removed when no longer required.
- Confidential information is not shared through unauthorised channels.

Password Security

AdaptEd Tuition Ltd operates secure password practices, including:

- Systems containing personal data must be protected by strong passwords.
- Passwords must not be shared.
- Users should avoid reusing passwords across multiple systems where possible.
- Passwords should contain a combination of upper and lowercase letters, numbers and special characters where supported.
- Default passwords must be changed before systems are used for business purposes.
- Passwords must be stored securely.
- Multi-factor authentication (MFA) is enabled where available, particularly for systems containing personal or sensitive information.
- Access may be suspended following repeated failed login attempts or suspected unauthorised activity.

Cybersecurity Protection

Appropriate cybersecurity measures include:

- Secure, password-protected systems.
- Multi-factor authentication where available.
- Encrypted cloud storage and secure data transfer methods.
- Secure website hosting.

- Firewall protection.
- Anti-virus and anti-malware protection.
- Regular software updates and security patches.
- Secure configuration of devices and systems.
- Review of third-party platforms used to process personal data.
- Secure backup arrangements where appropriate.
- Monitoring for suspected security incidents.

Device Security

Where devices are used to access AdaptEd Tuition Ltd systems or personal data:

- Devices must be protected with passwords, PINs or biometric security where available.
- Devices must have appropriate security updates installed.
- Devices must not be left unattended while logged into systems containing personal data.
- Lost or stolen devices must be reported promptly.
- Personal data should not be stored locally unless necessary and appropriately protected.

Staff and Tutor Responsibilities

All staff, directors, tutors and authorised individuals accessing personal data must:

- Maintain confidentiality.
- Follow cybersecurity procedures and instructions.
- Report suspected phishing emails, malware, unauthorised access or security concerns promptly.
- Complete required data protection or cybersecurity training.
- Only access information necessary for delivering AdaptEd Tuition Ltd services.

Phishing and Cyber Threat Awareness

AdaptEd Tuition Ltd recognises that cyber threats, including phishing emails, fraudulent communications, malware and unauthorised attempts to access accounts, may present risks to personal data.

Individuals working with AdaptEd Tuition Ltd must:

- Remain vigilant.
- Avoid clicking suspicious links or attachments.
- Never provide passwords or login details in response to unexpected requests.
- Report suspected cybersecurity incidents immediately.

15. Online Tuition and Lesson Recording

Lesson recordings are not routinely made.

Recording will only occur where necessary for:

- Safeguarding.
- Complaint investigation.
- Tutor supervision.
- Quality assurance.
- Training.
- Other legitimate reasons identified by AdaptEd Tuition.

Where recordings are made:

- Recordings are stored securely.
- Access is restricted to authorised personnel.
- Recordings are retained only for as long as necessary.
- Recordings are permanently deleted when no longer required.

Where required, parents, guardians, learners and tutors will be informed about lesson recordings and any necessary consent will be obtained in accordance with UK data protection requirements.

Online Teaching Platforms

AdaptEd Tuition Ltd may use:

- Pencil Spaces via Tutorcruncher.
- Google Meets.
- Microsoft Teams.
- Zoom.

Lesson Recording Practices

Learners and tutors must not independently record lessons unless prior permission has been granted by the Designated Safeguarding Lead (DSL).

Where recording is required for safeguarding purposes, it will only take place in accordance with AdaptEd Tuition Ltd safeguarding procedures.

Parents, guardians, learners or tutors who do not wish online lessons to be recorded may submit a written request to AdaptEd Tuition Ltd. Alternative safeguarding measures will be considered where appropriate.

Storage of Recordings

Lesson recordings are:

- Password protected.

- Stored securely on an encrypted or otherwise secure platform.
- Protected through appropriate user permissions, authentication controls and cybersecurity measures.

Recordings must not be:

- Downloaded.
- Copied.
- Shared.
- Stored on personal devices.

Unless expressly authorised by AdaptEd Tuition Ltd for safeguarding or operational purposes.

Access to Recordings

Access is restricted to:

- Directors of AdaptEd Tuition Ltd.
- Authorised safeguarding personnel.
- Tutors where necessary for training or safeguarding purposes.

Retention Period

Lesson recordings are retained for no longer than **3 months** unless required for safeguarding, legal or complaint investigation purposes.

Following this period, recordings will be securely and permanently deleted.

16. Data Retention and Records Management

AdaptEd Tuition Ltd retains personal data only for as long as necessary to fulfil the purposes for which it was collected and to meet legal, safeguarding, regulatory and contractual obligations.

Records are maintained in a manner that ensures they remain:

- Accurate.
- Secure.
- Accessible where required.
- Protected against unauthorised access, alteration or loss.

Typical retention periods include:

Record	Typical Retention Period
Learner, Parent and Guardian Records	Up to 7 years after tuition ends, unless a longer period is required by law or safeguarding obligations.

Tutor Records	Up to 7 years after tuition contract ends, unless a longer period is required by law or safeguarding obligations.
Financial Records	6 years in accordance with legal and accounting requirements.
Lesson Recordings	No longer than 3 months, unless required for an ongoing safeguarding, legal or complaint investigation.
Safeguarding Records	For as long as necessary in accordance with our safeguarding responsibilities, legal obligations and any applicable guidance.

Where required by law, AdaptEd Tuition Ltd may retain certain records for longer periods.

When personal data is no longer required, it is securely deleted or anonymised and a record is kept of when deletion has taken place.

17. Data Breaches

Any individual who becomes aware of an actual or suspected personal data breach must report it immediately to a Director.

Staff and tutors must take reasonable steps to contain the breach where this can be done safely, for example:

- Recalling an email.
- Securing documents.
- Restricting further access to personal data.

AdaptEd Tuition Ltd will:

- Investigate the breach promptly.
- Assess risks to affected individuals.
- Notify the Information Commissioner's Office (ICO) where required by law.
- Inform affected individuals where there is a significant risk to their rights and freedoms.
- Implement measures to prevent recurrence.

All breaches, whether or not reportable to the ICO, will be recorded in a Data Breach Register to support monitoring, learning and continuous improvement.

18. Individual Rights

Under UK data protection law, individuals have rights regarding their personal data.

Individuals have the right to:

Right of Access

Request access to personal data held about them.

Upon request, AdaptEd Tuition Ltd can provide:

- Details of the information held.
- The reasons it is processed.
- Information about third parties with whom it has been shared.
- A copy of personal data in an accessible format where reasonably possible.

Right to Rectification

Request correction of inaccurate or incomplete personal data.

Right to Erasure

Request deletion of personal data where appropriate.

Right to Restrict Processing

Request restrictions on how personal data is processed.

Right to Data Portability

Request transfer of personal data in a structured, commonly used and machine-readable format where applicable.

Right to Object

Object to certain types of processing activities.

Right to Withdraw Consent

Withdraw consent where processing is based on consent.

Requests may be made verbally or in writing using the contact details provided in the Privacy Notice.

19. Fees and Response Times

Electronic copies of personal data will normally be provided free of charge.

Where a paper copy is specifically requested, AdaptEd Tuition Ltd may charge a reasonable administrative fee to cover printing and postage costs.

AdaptEd Tuition Ltd aims to respond to all legitimate requests within one month.

Where requests are complex or numerous, additional time may be required. Individuals will be informed if an extension is necessary.

This approach is in accordance with the Data Protection Act 2018 and UK GDPR requirements.

20. Verification of Identity

For security purposes, AdaptEd Tuition Ltd may request information to verify an individual's identity before processing requests relating to personal data.

This helps ensure that personal data is only disclosed to the correct person or an appropriately authorised representative.

21. Complaints

AdaptEd Tuition Ltd aims to maintain the highest standards when collecting, using and protecting personal data.

Any concerns regarding data protection should be raised with AdaptEd Tuition Ltd in the first instance so that we can investigate and attempt to resolve the matter.

Individuals may contact:

Data Protection Contacts:

Hayley Rollings and Gary Essex

(Responsible for overseeing data protection and privacy matters at AdaptEd Tuition Ltd)

Email:

info@adaptedtuition.org

Registered Business Address:

71–75 Shelton Street

Covent Garden

London

WC2H 9JQ

Company Number: 17108970

Individuals also have the right to lodge a complaint with:

Information Commissioner's Office (ICO)

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Website:

www.ico.org.uk

AdaptEd Tuition Ltd welcomes feedback and suggestions to improve our privacy practices.

22. Monitoring and Review

This policy will be reviewed annually or sooner where there are significant changes to:

- Data protection legislation
- Regulatory guidance
- Organisational practices
- Information management systems
- Services provided by AdaptEd Tuition Ltd

The Directors of AdaptEd Tuition Ltd are responsible for ensuring that this policy remains accurate, effective and aligned with the Privacy Notice and applicable data protection requirements.