

Data Protection Policy

This policy was updated on **1st June 2025**.



Private In-Person and Online Tutoring for
KS3, GCSE & A Level Students

1. Introduction

Smart Skills Tutoring Ltd is committed to safeguarding the personal data of all individuals who engage with our services, including students, parents/carers, staff, and tutors. We operate in full compliance with the UK General Data Protection Regulation (UK GDPR) and the *Data Protection Act 2018*. This policy outlines our approach to data protection and sets out the responsibilities of all individuals who process personal data on behalf of the organisation.

2. Purpose

The purpose of this policy is to ensure that all personal data:

- Is collected and processed lawfully, fairly and transparently;
- Is only used for specific, explicit and legitimate purposes;
- Is adequate, relevant and limited to what is necessary for processing;
- Is accurate and, where necessary, kept up to date;
- Is stored securely and retained only for as long as necessary;
- Is processed in a manner that ensures appropriate security and confidentiality.

3. Scope

This policy applies to all personal data processed by Smart Skills Tutoring Ltd, including but not limited to data relating to:

- Tutors (employed or contracted)
- Students and their families
- Administrative staff
- Partner organisations and clients
- It applies to all formats and methods of data handling, including paper-based records, electronic systems, and verbal communications.

4. Legal Framework

This policy is governed by the UK GDPR and the Data Protection Act 2018. These laws place strict obligations on organisations that handle personal data and confer a range of rights to individuals (data subjects).

5. Lawful Basis for Processing

Smart Skills Tutoring Ltd processes personal data only where a lawful basis under Article 6 of the UK GDPR applies, including:

- Consent – where the data subject has given clear and informed permission;
- Contract – when processing is necessary to fulfill contractual obligations;
- Legal obligation – where processing is required by law;
- Vital interests – where necessary to protect someone's life;
- Legitimate interests – where processing is necessary for our legitimate interests, provided this does not override the individual's fundamental rights.

6. Roles and Responsibilities

Data protection is the responsibility of everyone who processes personal data on behalf of Smart Skills Tutoring Ltd.

- The Data Protection Officer (DPO) or Director has overall responsibility for overseeing data protection compliance, responding to subject access requests, and managing data breaches.
- Managers and team leaders are responsible for ensuring that staff under their supervision adhere to this policy.
- All staff and tutors must handle data in accordance with this policy and report any concerns or breaches promptly.

7. Types of Personal Data Collected

We may collect and process the following categories of personal data:

- Full name, date of birth, contact details
- Educational background and learning needs
- Safeguarding disclosures
- Tutor qualifications and DBS status
- Attendance records, session progress, and feedback
- Financial and payment-related information

7.1. Special Category Data

We may also process special category personal data where strictly necessary and with explicit consent, or where another lawful condition under Article 9 of the UK GDPR applies. This may include data concerning:

- Health conditions and Special Educational Needs (SEN)
- Racial or ethnic origin
- Religious beliefs
- Information for safeguarding purposes
- Strict additional safeguards are applied to the collection, handling, and storage of such data.

8. Data Sharing and Confidentiality

Smart Skills Tutoring Ltd does not share personal data with third parties without consent, unless:

- Required by law;
- Necessary to protect the vital interests of a data subject;
- Required for safeguarding or child protection reasons.

8.1. If Necessary: Where sharing is necessary, it will be limited and proportionate. Data may be shared with:

- Designated safeguarding leads or local authorities
- Educational or support institutions (with consent)
- Regulatory or enforcement bodies (where legally obliged)
- All third-party data sharing is subject to data sharing agreements and appropriate safeguards.

9. Data Security and Storage

We employ appropriate technical and organisational measures to protect all personal data from unauthorised access, loss, misuse, or disclosure. These include:

- Encrypted digital platforms and secure cloud services
- Use of approved communication channels only
- Access control for authorised personnel only
- Antivirus software and firewalls on all devices
- Strong password protocols and multi-factor authentication where applicable
- Personal data is stored securely and retained in accordance with our Data Retention Schedule.

10. Rights of Data Subjects

All individuals have the following rights under the UK GDPR:

- The right to be informed about how their data is processed
- The right to access their personal data
- The right to rectification of inaccurate or incomplete data
- The right to erasure (the "right to be forgotten") in certain circumstances
- The right to restrict or object to processing
- The right to data portability
- The right not to be subject to automated decision-making or profiling
- Requests to exercise these rights must be made in writing to the Data Protection Officer.

11. Training and Awareness

Smart Skills Tutoring Ltd is committed to ensuring that all staff and tutors receive appropriate training on data protection principles, policy awareness, and best practice. This includes:

- Induction training on data protection obligations
- Periodic refresher training sessions
- Guidance on recognising and reporting data breaches
- Updates following changes in legislation or policy
- All staff are expected to complete data protection training as required and follow internal guidance at all times.

12. Breaches and Complaints

Any actual or suspected data breach must be reported immediately to the Data Protection Officer or the director. They will investigate and, where appropriate, report the breach to the Information Commissioner's Office (ICO) within 72 hours.

Complaints about data handling should be submitted in writing to the director or DPO. If the complainant is dissatisfied with the outcome, they may escalate the complaint directly to the ICO.

Director: Stembie Angel

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This policy came into effect on 5th June 2025.

This policy will be reviewed on an annual basis or sooner if required due to changes in legislation, regulatory guidance, best practice, or operational needs. Smart Skills Tutoring Ltd is committed to ensuring the policy remains accurate, relevant, and compliant with data protection law.

Signed: Stembie Angel

Date: 1st June 2025