

Information Storage, Privacy & Information-Sharing Policy

Data Protection (UK GDPR), Record Retention & Safeguarding Disclosure Standards

Data Controller:	Tom Wicks
Contact Email:	tomwickstutoring@gmail.com
Regulatory Compliance:	UK GDPR / Data Protection Act 2018
Policy Review Date:	August 2026 (Annual Review)

1. Purpose and Legal Basis

As a sole practitioner providing private tuition, I process personal and sensitive data in compliance with the Data Protection Act 2018 and UK GDPR. This policy explains how I collect, store, secure, share, and delete three distinct categories of information:

- **Contractual Data:** Contact details and billing information (Lawful Basis: Contract / Legitimate Interests).
- **Educational Records:** Tutorial notes, homework, and academic progress tracking (Lawful Basis: Contract).
- **Safeguarding & Child Protection Records:** Disclosures, welfare concerns, and incident logs (Lawful Basis: Legal Obligation / Substantial Public Interest under DPA 2018 Schedule 1 Part 2).

2. Categories of Data Collected and Stored

- **Contact & Administrative Details:** Parent/guardian names, email addresses, phone numbers, home addresses (for in-person tuition), and student names, ages, and year groups.
- **Tutorial & Academic Information:** Lesson plans, formative assessment notes, copies of marked homework, exam board specifications, and mutually agreed lesson recordings (where consent has been obtained).
- **Safeguarding & Child Protection Records:** Chronological logs of concerns, objective behavioural observations, verbatim disclosure notes, and escalation correspondence with statutory bodies.

3. Data Storage, Security and Access Control

To prevent unauthorised access, loss, or breaches, strict security controls are maintained across all data tiers:

- **Digital Security:** All electronic records are stored on password-protected, encrypted devices utilising multi-factor authentication (MFA). Cloud storage utilises zero-knowledge UK/EEA GDPR-compliant servers.
- **Segregation of Safeguarding Files:** Child protection logs and safeguarding concerns are kept strictly segregated from general academic files. Safeguarding records are stored in a dedicated, AES-256 encrypted container accessible exclusively by me as the sole practitioner.

- **Physical Data:** Any hard-copy working notes or paper-based assessment materials are kept in a locked filing box and digitised promptly, after which paper copies are securely cross-cut shredded.

4. Information Sharing Protocols

Data is handled with strict confidentiality and is shared only under specific, clearly defined circumstances:

- **Academic & Progress Sharing:** Tutorial notes and academic feedback are shared exclusively with the student and their registered parent/guardian via email or secure cloud portal. No academic information is shared with third parties without parental consent.
- **Information Sharing for Safeguarding:** Under UK statutory guidance ('Information sharing advice for safeguarding practitioners'), the Data Protection Act 2018 contains clear provisions allowing personal data to be shared without consent if there is a safeguarding concern, risk of harm, or overriding public interest.
- **Sharing with Statutory Authorities:** In child protection scenarios, information will be shared directly with Local Authority Children's Social Care (MASH), the police, or the Local Authority Designated Officer (LADO). Parents are informed unless doing so places the child at increased risk of harm.

5. Data Retention and Destruction Schedules

Data is retained only as long as legally required and strictly necessary for the purpose it was collected:

- **Contact & Financial Records:** Retained for 6 years following the end of the tax year in which tuition ceases, in compliance with HMRC accounting requirements.
- **Academic Notes & Homework:** Retained for up to 12 months after the conclusion of the tutoring agreement, after which files are permanently deleted.
- **Lesson Recordings (if applicable):** Retained for a maximum of 30 days for revision/safeguarding auditing, then permanently overwritten unless required for an ongoing investigation.
- **Safeguarding & Child Protection Logs:** Retained until the student reaches the age of 25 (in alignment with statutory child protection and Independent Inquiry recommendations), after which they are securely purged.

6. Individual Rights and Subject Access Requests (SAR)

Under UK GDPR, parents and students possess legal rights regarding their personal data, including the right of access, rectification, and erasure ('right to be forgotten'):

- **Submitting a Request:** Requests can be submitted in writing to the contact email provided above and will be fulfilled within 1 calendar month without charge.
- **Safeguarding Exemptions:** In accordance with Schedule 2 Part 4 of the Data Protection Act 2018, the right of access does not apply to child protection records if disclosure would likely prejudice the prevention or detection of abuse, or cause serious harm to the physical or mental health of the child or another individual.