



Data Protection Policy

1. Aims

At HB Tuition, we are committed to ensuring that all personal data collected about staff, students, parents, and other individuals is handled in accordance with UK data protection law. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and Guidance

This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- Education (Pupil Information) (England) Regulations 2005

It is based on guidance published by the Information Commissioner's Office (ICO) and the Department for Education (DfE).

3. Definitions

- Personal data: Any information relating to an identified or identifiable living individual.
- Special category data: Sensitive personal data such as racial origin, political opinions, or health data.
- Processing: Any operation performed on personal data.
- Data subject: The individual whose data is held.
- Data controller: The organisation determining the data use.
- Data processor: A third party processing data on behalf of the controller.

4. The Data Controller

HB Tuition is the data controller under the UK GDPR.

5. Roles and Responsibilities

- Proprietor: Ensures compliance.
- Data Protection Officer (DPO): Oversees compliance and implementation.

- All Staff: Handle data appropriately and securely.

6. Data Protection Principles

- Lawfulness, fairness, and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality

7. Collecting Personal Data

HB Tuition collects data to:

- Support learning
- Monitor progress
- Provide care
- Assess service quality
- Meet legal requirements

8. Sharing Personal Data

Data is shared only when legally required, necessary for operations, or with consent.

9. Subject Access Requests and Other Rights

Individuals have the right to access personal data. Requests must be in writing to the DPO.

10. Parental Requests

Parents may access their child's records upon written request. We respond within 15 school days.

11. Photographs and Videos

Used for promotion and achievement recognition. Consent is obtained beforehand.

12. Artificial Intelligence (AI)

AI use follows data protection laws and government guidance.

13. Data Protection by Design

Data protection is integrated from the planning stage of all processes.

14. Data Security

Data is stored securely. Access is limited and monitored.

15. Disposal of Records

Records are destroyed securely — shredding for paper, permanent deletion for digital.

16. Personal Data Breaches

Breaches are reported and, if needed, the ICO is informed within 72 hours.

17. Training

All staff receive data protection training during induction and regularly after.

18. Monitoring

The DPO reviews this policy annually.

19. Linked Policies

- Safeguarding and Child Protection Policy
- Anti-Bullying Policy
- Online Safety Policy

Reviewed: May 2025	Andrew Booth
Next review: May 2026	