tutor-vision

www.tutor-vision.co.uk

Privacy Notice

Tutor Vision Ltd

Notice status: Updated

Data controller: Tutor Vision Ltd

ICO registration: ZC244735

Privacy contact: data@tutor-vision.co.uk

Registered/contact address: 49 St Paul's Terrace, Holgate, York, YO24 4BJ, United Kingdom

Effective date: 21 September 2026

Next scheduled review: 21 September 2027

Earlier review triggers: a change in law or ICO guidance; a new use of personal data; a new processor or international transfer; a material change to online tuition, recording or artificial-intelligence use; a significant data incident; or a Local Authority/commissioner requirement.

1. What this notice is for

Tutor Vision Ltd ("Tutor Vision", "we", "us" or "our") provides private tuition, school-commissioned tuition, Local Authority-commissioned alternative provision, educational products and related support services. This notice explains how and why we collect, use, share, store and protect personal information.

It applies to students, including children and adults; parents and carers; tutors and contractors; website users; customers; schools, Local Authorities and other organisations that work with us. We may provide additional privacy information where a particular service or relationship requires more detail.

We handle personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 as amended, including relevant changes made by the Data (Use and Access) Act 2025, and other applicable data-protection law.

2. A short privacy summary for students and young people

If you are a student, this is the most important information to know:

- We use information about you so that we can arrange and provide tuition safely and effectively.
- We may receive information from you, your parent or carer, your school, a Local Authority or another organisation arranging your tuition.
- We only ask for information that we reasonably need. This can include your contact details, age, school information, learning needs, attendance, progress and, where relevant, safeguarding or health information.

- We may share information with your parent or carer, tutor, school, Local Authority or safeguarding services when there is a proper reason to do so.
- If we are worried that you or another child may be unsafe, we may need to share information even if you or an adult has not given permission. We only share what is needed for the safeguarding purpose.
- We use approved third-party systems for online tuition, video conferencing, communication and related educational services. These services may process information in the UK and in other countries, with appropriate data-protection safeguards in place.
- We may create written transcripts of tuition sessions. Audio may be processed temporarily to create the transcript, but the audio is normally deleted promptly after transcription and any limited technical or accuracy checks are complete. The written transcript may be kept in accordance with our Records Retention Schedule.

We do not routinely keep audio or video recordings of tuition sessions. Exceptionally, a session may be recorded for a defined and justified purpose such as safeguarding, investigating an incident or complaint, specific quality assurance, legal or insurance needs, or a commissioner requirement. Where required, you and the relevant adult or commissioner will be given appropriate privacy information.

- We do not put identifiable safeguarding disclosures into public generative-AI services. We do not use a child's identifiable personal information to train public or general-purpose AI models.
- You have data-protection rights. Depending on your age and understanding, you may be able to exercise these rights yourself. You can also ask a trusted adult to help you.

3. Who is responsible for your information?

3.1 Direct private tuition and Tutor Vision services

For most direct private tuition and Tutor Vision business activities, Tutor Vision Ltd is the data controller. This means we decide why and how personal information is used.

3.2 School or Local Authority commissioned provision

Where a school, Local Authority or another organisation commissions tuition, that organisation may be a data controller and Tutor Vision may act as its processor for some activities carried out on its documented instructions. Tutor Vision may also act as an independent controller for information we must use for our own legal, safeguarding, insurance, accounting, quality, contractual or business purposes. The exact roles depend on the commissioning arrangement. Students and families should also read the commissioner's privacy information where applicable.

4. Personal information we may collect

- Identity and contact information: name, age or date of birth, address, email address, telephone number and parent/carer or emergency-contact details.
- Educational information: school or setting, year group, subjects, attainment, assessments, targets, attendance, engagement, lesson notes, progress and feedback.

- Referral and placement information: information supplied by a school, Local Authority or other commissioner about the purpose of tuition, placement arrangements, relevant risks, attendance expectations and review requirements.
- Special category information where needed: for example health, disability, SEND, learning needs, accessibility requirements, racial or ethnic origin, religious information where relevant to support or safeguarding, and other sensitive information supplied to us.
- Safeguarding and welfare information: concerns, disclosures, risk information, referrals, actions, decisions and information shared with safeguarding partners.
- Tutor and contractor information: identity, contact details, qualifications, references, experience, right-to-work information where relevant, DBS/suitability information, insurance, availability, payment and performance/quality records.
- Payment and transaction information: billing details, invoices, payment status and transaction records. Payment-card information is normally handled by our payment provider rather than stored directly by Tutor Vision.
- Online and technical information: IP address, device/browser information, system logs, account and security information, cookies and similar technology where applicable.
- Communications: emails, messages, enquiries, complaints, feedback and other correspondence.

Session transcript information: written transcripts of tuition sessions, which may include lesson content, questions and answers, educational progress, comments made during the session, speaker attribution and timestamps where generated. Audio may be processed temporarily for the sole purpose of creating a transcript and is not retained as a routine session recording.

5. Where we get personal information from

- the student directly;
- parents, carers or responsible adults;
- tutors, contractors and staff;
- schools, Local Authorities, colleges and other commissioners or referral partners;
- safeguarding, health or other professional services where sharing is lawful and relevant;
- our website, online systems and approved third-party service providers;
- public or official sources where necessary for recruitment, verification, legal compliance or safeguarding.

6. Why we use personal information and our lawful bases

We only process personal information where we have a lawful basis. The lawful basis depends on the activity and may differ between direct private tuition and commissioned provision.

6.1 Contract

We may use personal information where processing is necessary to enter into or perform a contract, for example to arrange and deliver private tuition, administer bookings, communicate about lessons and process payments.

6.2 Legal obligation

We may process information where the law requires us to do so, including relevant accounting, tax, safeguarding, regulatory, court or statutory reporting obligations.

6.3 Legitimate interests

We may rely on legitimate interests where processing is necessary for reasonable educational, safeguarding, operational and business purposes and those interests are not overridden by the rights and interests of the individual. These interests may include providing safe and effective tuition; maintaining coherent educational and session records; creating and retaining session transcripts; continuity of teaching and progress monitoring; quality assurance; maintaining professional standards; safeguarding and welfare oversight; detecting, preventing and investigating concerns, incidents, complaints, misconduct, misuse or security issues; protecting students, tutors, staff and the organisation; establishing, exercising or defending legal claims; insurance and risk management; service administration, improvement and business continuity; and meeting reasonable commissioner assurance requirements. Where children's information is involved, we give particular weight to the child's interests and rights and document the necessity and balancing assessment where required.

Where processing is necessary to safeguard a child or another vulnerable individual and the statutory recognised-legitimate-interest safeguarding condition is available, Tutor Vision may rely on that basis. Safeguarding may also be supported by another lawful basis, such as legal obligation, vital interests or a commissioner's public task, depending on the circumstances. Whatever basis applies, the processing must remain necessary, proportionate and consistent with our Safeguarding & Child Protection Policy.

6.4 Vital interests

In an emergency, we may process or share information where this is necessary to protect someone's life or physical safety and another lawful basis is not appropriate.

6.5 Consent

We use consent where the processing is genuinely optional and consent is an appropriate lawful basis, for example some direct marketing, optional uses of images, or other optional activities. Consent is not normally relied on for processing that is necessary to provide the core service or to meet safeguarding responsibilities. Consent can be withdrawn at any time, but withdrawal does not make earlier lawful processing unlawful.

7. Special category and sensitive information

Some information requires additional protection under data-protection law. This may include information about health, disability, SEND, racial or ethnic origin, religion and other special category information.

Where we process special category information, we identify both an Article 6 lawful basis and a separate Article 9 condition. Depending on the circumstances, this may include explicit consent, substantial public interest conditions under the Data Protection Act 2018 (including

safeguarding individuals at risk where applicable), or another condition available under law. We do not treat a general need to provide educational support as, by itself, an Article 9 condition.

Session transcripts may incidentally contain health, SEND, safeguarding or other special category information. Where such information is retained or otherwise processed, the applicable Article 9 condition and any additional Data Protection Act 2018 requirements will be identified and applied.

Where criminal-offence or DBS-related information is processed, we do so only where permitted by law and with appropriate safeguards.

8. Children's information

Children have the same core data-protection rights as adults. We take particular care because children may be less aware of the risks and consequences of the use of their personal information.

- We aim to explain our use of personal information in clear language appropriate to the child's age and understanding.
- We collect only information that is reasonably necessary for the service, safeguarding, legal obligations or another identified purpose.
- Parental consent is not automatically required for every use of a child's personal information. The lawful basis depends on the purpose of the processing.
- A child who has sufficient understanding may be able to exercise data-protection rights themselves. We will consider age, maturity, capacity, the nature of the request and any safeguarding concerns.
- Where information comes from a school or Local Authority, we will respect the relevant controller/processor arrangements and provide privacy information where required.

9. Safeguarding and information sharing

Our Safeguarding & Child Protection Policy is the controlling safeguarding standard for Tutor Vision. Data protection does not prevent lawful information sharing where information is needed to safeguard a child.

We may collect, record, transcribe, use and share safeguarding information without consent where this is lawful, necessary and proportionate to protect a child or another vulnerable person, identify or assess risk, respond to a disclosure or concern, preserve an accurate account of relevant events, support multi-agency safeguarding, investigate allegations or incidents, or meet a lawful safeguarding or commissioner requirement. Depending on the circumstances, our Article 6 basis may include recognised legitimate interests for safeguarding, legitimate interests, legal obligation, vital interests or a commissioner's public task. Where special category or criminal-offence information is involved, an additional lawful condition will also be identified. We record material sharing and safeguarding decisions, including what was shared or withheld, with whom, why, the basis for the decision and any next action. Where telling a parent or carer could increase risk, compromise an enquiry or

otherwise be unsafe, we may seek advice from children's social care, police or another appropriate authority before doing so.

Safeguarding records are kept securely, with access restricted to those who need the information for an authorised purpose.

10. Online tuition and third-party technology providers

Tutor Vision may use approved third-party technology providers to deliver online tuition, video conferencing, communication and related educational services. Depending on the service and contractual relationship, those providers may process technical, account, meeting, communications and related information on our behalf or in accordance with their own applicable privacy terms.

Some approved technology providers operate internationally. Personal information may therefore be transferred to, stored in or accessed from countries outside the UK. Where a restricted transfer occurs, Tutor Vision will ensure that an appropriate lawful transfer mechanism and safeguards are in place in accordance with UK data-protection law. These may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved standard contractual clauses, or another lawful safeguard.

Tutor Vision reviews the data-protection, security, processor and subprocessor arrangements of approved providers as part of its data-protection governance and commissioner assurance. Current suppliers are recorded separately in Tutor Vision's processor and supplier register so that this Privacy Notice does not become inaccurate when providers change.

11. Session transcripts, exceptional recordings, images and screenshots

Tutor Vision may create and retain written transcripts of tuition sessions. Audio may be captured or processed temporarily by an approved system solely to create the transcript. Unless audio or video recording has been separately authorised for an exceptional purpose, the temporary audio is deleted promptly after the transcript has been created and any limited technical or accuracy check is complete. The transcript, rather than the audio, is the retained session record.

Transcripts may be used where necessary for educational continuity and progress monitoring, quality assurance, safeguarding and welfare, professional standards, investigation of complaints or incidents, commissioner assurance, service improvement, insurance or legal purposes. Tutor Vision may rely on contract, legitimate interests, recognised legitimate interests for safeguarding, legal obligation, vital interests or another appropriate lawful basis according to the purpose and circumstances.

Tutor Vision does not routinely retain full audio or video recordings of tuition sessions. Exceptionally, a session may be recorded where there is a defined, documented and proportionate purpose, for example a safeguarding need, investigation of an incident or complaint, specific quality assurance requirement, legal or insurance need, or lawful commissioner requirement. The purpose, lawful basis, access arrangements and retention

period will be documented before or as soon as reasonably practicable after the processing begins, and appropriate privacy information will be given where required.

Tutors, contractors and learners must not make personal or unauthorised recordings, photographs or screenshots of students or sessions. A transcript or exceptional recording may be preserved for longer where it becomes relevant to a safeguarding matter, complaint, legal claim, regulatory enquiry or other documented hold.

12. Artificial intelligence and anonymised information

Tutor Vision may use approved digital or AI-assisted tools, including speech-to-text or transcription technology, where their use is lawful, appropriate and consistent with our safeguarding and data-protection requirements. Approved transcription tools may process session audio temporarily to generate a written transcript. Provider terms, security, retention, international transfers and any use of data for model training or product improvement must be assessed before approval. Personal information and safeguarding information must not be entered into public generative-AI services unless the tool, purpose and safeguards have been specifically approved.

We do not use children's identifiable personal information or identifiable safeguarding disclosures to train public or general-purpose AI models.

We may use genuinely anonymised and aggregated information for statistics, service improvement, educational research or product development. Information is only treated as anonymised where individuals are no longer identifiable by reasonably likely means. Truly anonymised information is not personal data under UK GDPR.

13. Who we may share personal information with

- students, parents and carers where appropriate;
- tutors, contractors and authorised Tutor Vision personnel who need the information;
- schools, Local Authorities and other commissioners or referral organisations;
- children's social care, Local Authority Designated Officers, police, health services, safeguarding partners, Prevent/Channel arrangements or other statutory bodies where appropriate;
- approved video-conferencing, online-tuition, IT, hosting, communications, learning-platform and cloud-service providers;
- payment processors, accountants, insurers, legal advisers and other professional service providers;
- regulators, courts and public authorities where disclosure is required or permitted by law.

We do not sell personal information.

14. International transfers

Some of our approved service providers may process or allow access to personal information outside the UK. Before relying on an international transfer, Tutor Vision considers whether the UK transfer rules apply and what lawful transfer mechanism and safeguards are required.

Where necessary, safeguards may include UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to the EU Standard Contractual Clauses, recognised data-transfer frameworks or another mechanism permitted by UK law. We also consider supplier security, contractual terms and the nature of the information involved.

15. How long we keep personal information

We keep personal information only for as long as it is reasonably necessary for the purpose for which it was collected, and to meet legal, safeguarding, contractual, accounting, insurance or commissioner requirements. Different categories of records have different retention periods.

Tutor Vision maintains a Records Retention Schedule covering student educational records, attendance, contracts, invoices, safeguarding records, complaints, recruitment records, data-protection records, session transcripts, temporary transcription audio and exceptional recordings. Routine session transcripts are normally retained for 12 months after the end of the relevant provision, subject to earlier deletion where no longer necessary and any commissioner-specific instruction. Audio processed solely to create a transcript is normally deleted within 7 days of successful transcription and any limited technical or accuracy check, and in any event within 30 days unless a separately documented hold applies. Exceptional audio/video recordings are normally deleted within 90 days after their defined purpose is complete unless they become part of a safeguarding, complaint, legal, insurance or regulatory record, in which case the relevant case-retention period applies. Where a school or Local Authority is the controller for commissioned data, we follow the agreed contractual return/deletion instructions unless Tutor Vision is legally entitled or required to retain particular information for its own purposes.

Genuinely anonymised information may be retained for longer because it is no longer personal data.

16. How we protect personal information

- access controls and account-security measures;
- secure storage and transmission arrangements appropriate to the information;
- restricted access to safeguarding and sensitive records;
- approved systems and communication channels;
- data-protection and safeguarding training;
- processor and contractual controls;
- incident and personal-data-breach reporting procedures;
- secure deletion or destruction when information is no longer required.

No method of storage or transmission is completely risk-free, but we take proportionate technical and organisational measures appropriate to the risks involved.

17. Personal data breaches

We investigate actual and suspected personal-data breaches promptly. Tutors and contractors must report suspected breaches to Tutor Vision immediately and in accordance

with their contractual requirements. Tutor Vision assesses whether notification to the ICO and/or affected individuals is required under data-protection law and keeps a record of breach decisions and actions.

18. Your data-protection rights

Depending on the circumstances, you may have the right to:

- be informed about how your personal information is used;
- access your personal information;
- have inaccurate personal information corrected;
- have personal information erased in certain circumstances;
- restrict processing in certain circumstances;
- object to certain processing, including some processing based on legitimate interests and direct marketing;
- receive certain information in a portable format where the right to data portability applies;
- withdraw consent where consent is the lawful basis;
- raise concerns about automated decision-making where applicable.

These rights are not absolute and may be limited by law, including where information must be retained or disclosed for safeguarding, legal claims or another lawful reason. To exercise a right, contact data@tutor-vision.co.uk. We may need to verify identity before releasing information.

19. Automated decision-making

Tutor Vision does not currently use personal information to make solely automated decisions that produce legal or similarly significant effects on students, parents, tutors or customers. If this changes, we will provide the additional information required by law before the processing begins.

20. Cookies and website information

Our website may use cookies and similar technologies. Where consent is required for non-essential cookies, we will seek it through the relevant website controls. More detailed cookie information should be provided in the website Cookie Policy or cookie settings.

21. Marketing

We may send service communications that are necessary to administer tuition or an existing relationship. Direct marketing is handled separately and only where permitted by law. Individuals can object to or unsubscribe from direct marketing at any time.

22. Complaints and the Information Commissioner

Please contact Tutor Vision first if you have a question or concern about how we use personal information. We will try to resolve the issue promptly.

Tutor Vision Ltd is registered with the Information Commissioner's Office (ICO). Registration/reference number: ZC244735.

You also have the right to complain to the Information Commissioner's Office. The ICO's current contact and complaint information is available on its official website at ico.org.uk.

23. Changes to this notice

We review this notice regularly and will update it when our processing, service providers, law or guidance changes. If we plan to use personal information for a materially new purpose, we will update the relevant privacy information and bring the change to affected individuals' attention before the new processing begins where required.

24. Related Tutor Vision documents

- Safeguarding & Child Protection Policy;
- Data Protection & Privacy Policy;
- Records Retention Schedule;
- Personal Data Breach Procedure;
- Staff / Tutor Code of Conduct;
- Recruitment and Selection Policy;
- Self-Employed Tutor Contractor Agreement;
- commissioner-specific data-processing, information-sharing and safeguarding arrangements where applicable.

25. Contact details

Tutor Vision Ltd

49 St Paul's Terrace, Holgate, York, YO24 4BJ, United Kingdom

Privacy and data-protection contact: data@tutor-vision.co.uk

Website: www.tutor-vision.co.uk

ICO registration/reference number: ZC244735

26. Review and approval

Effective date: 21 September 2026

Next scheduled review: 21 September 2027

This notice will be reviewed sooner if there is a material change in processing, law, ICO guidance, technology, processors, international transfers, safeguarding arrangements or commissioner requirements.