

**Data Protection Policy**

**Corryn’s SEN Tutor Services**

**www.corrynsentutor.com |** **c.sinclair@corrynsentutor.com**

**1. Introduction**

As a sole trader tutor, I (Corryn Sinclair) collect, store, and use personal data in order to deliver effective education and support services. This policy sets out how I comply with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and other relevant legislation. I am registered with the ICO (Information Commissioner’s Office) as a data controller.

**2. Purpose**

This policy ensures that personal information is handled lawfully, transparently, securely, and respectfully. It applies to data relating to students, parents/carers, subcontracted tutors, and other individuals connected with my services.

**3. Legal Basis for Processing Data**

I process personal data under the following lawful bases:

* Consent – when you have given clear permission for me to process your data.
* Contract – when data processing is necessary to fulfil a tutoring agreement.
* Legal obligation – for safeguarding, tax, or accounting requirements.
* Vital interests – when processing is necessary to protect someone’s life or safety.
* Legitimate interests – when data is needed to deliver and improve my services.

**4. What Data I Collect**

I may collect the following types of personal data:

* Names, contact details, addresses
* Student information (e.g. age, educational needs, EHCP details)
* Session notes, assessments, progress reports
* Invoicing and payment records
* Safeguarding records where relevant

**5. How Data is Collected**

Data is collected directly from:

* Parents/carers or clients (via email, phone, intake forms)
* Students (where appropriate and with consent)
* Schools or local authorities (with permission)
* Subcontracted tutors or professionals I collaborate with

**6. How Data is Stored**

* All electronic records are stored securely on password-protected devices or encrypted cloud services.
* Paper records (if used) are stored in a locked cupboard and shredded when no longer required and stored digitally instead.
* Only I (Corryn Sinclair) or trusted professionals with a specific need to know may access this data.

**7. Data Sharing**

I will not share personal data with third parties without your permission unless:

* I am legally required to do so (e.g. safeguarding, HMRC, courts).
* It is necessary to protect a person’s vital interests.
* I am working with a subcontracted tutor or SEND professional under strict confidentiality agreements.

**8. Data Retention**

I retain personal data only for as long as necessary:

* Session records and safeguarding notes: 6 years (or as required by law)
* Invoices and payment records: 6 years (for tax purposes)
* General correspondence: 2 years unless still relevant

After these periods, data is securely deleted or destroyed.

**9. Your Rights**

You have the right to:

* Access your personal data
* Request correction or deletion
* Object to processing or request restrictions
* Withdraw consent at any time (where applicable)
* Lodge a complaint with the ICO (www.ico.org.uk)

**10. Data Breaches**

If a personal data breach occurs, I will assess the risk and, where required, report it to the ICO within 72 hours. Affected individuals will be informed if there is a high risk to their rights or freedoms.

**11. Contact**

If you have any questions or wish to make a request regarding your data, please contact:

Corryn Sinclair

Email: c.sinclair@corrynsentutor.com

Website: www.corrynsentutor.com

ICO Registration Number: ZB677591

12. Policy Review

This policy will be reviewed annually or sooner if legislation or business practices change.

Policy last reviewed: July 2025

Next review due: July 2026

Policy owner: Corryn Sinclair