



Beyond the Books: A holistic path to progress

# Privacy Notice & Data Subject Rights

Version: 1.0 | Reviewed: April 2026 | Next Review: April 2027

**Company Name:** A Different Approach Tutoring and Therapy Services Ltd

**Contact:** ADifferentApproach@ADAtutoringandtherapy.com

**ICO Registration Number:** ZC095694

At **A Different Approach (ADA) Ltd**, we take your privacy seriously. This notice explains how we collect, use, and protect the personal information you share with us regarding you and your child.

## 1. The Information We Collect

We collect data necessary to provide safe, effective, and legally compliant tutoring and therapy, including:

- **Identity Data:** Full names, dates of birth, and gender.
- **Contact Data:** Home addresses, email addresses, and phone numbers.
- **Special Category Data:** EHCP details, medical/allergy information, school reports, and therapeutic session notes (e.g., Drawing and Talking / STILL Method progress).
- **Safeguarding Data:** Information required to meet our statutory duties under KCSIE 2025/26.

## 2. Why We Use Your Data

- To deliver tailored tutoring and therapeutic interventions.
- To provide progress reporting to Local Authorities (e.g., Bedford Borough Council) or Schools.
- To comply with legal safeguarding and "Duty of Care" obligations.
- For professional billing and business administration.

### 3. Legal Basis for Processing

Under UK GDPR, we process data as it is necessary for the performance of a contract and to meet legal obligations (Safeguarding and Tax). Processing of "Special Category" (Health/SEND) data is conducted under the basis of providing health or social care.

### 4. Data Sharing

We only share information with third parties (Schools, Doctors, or Local Authorities) when we have a lawful basis to do so.

- **Consent:** For private commissions, we only share data with your explicit written consent.
- **Safeguarding:** We have a statutory duty to share information without consent if a child or adult is at risk of harm, as detailed in ADA\_POL\_001 (Safeguarding & Child Protection).
- **Online Safety:** Our protocols for sharing digital data and social media boundaries are governed by ADA\_POL\_010 (Online Safety & Acceptable Use).

### 5. Data Security & Retention

We use AES-256 bit encrypted digital storage. To meet statutory SEND and insurance requirements, we adhere to the strict archive schedules outlined in ADA\_POL\_002 (Data Protection & Records Management):

- **Educational & Therapy Records:** Retained for 6 years after our professional involvement ends.
- **Safeguarding Records:** Retained until the student reaches age 25.
- **Physical Disposal:** Once these periods expire, digital data is permanently deleted and any physical records are disposed of via secure incineration

### 6. Your Rights

You have the right to request a copy of your data (Subject Access Request), ask for corrections, or request deletion (where legal obligations allow).



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## 7. Contact Us

For any queries, please

email **[ADifferentApproach@ADAtutoringandtherapy.com](mailto:ADifferentApproach@ADAtutoringandtherapy.com)**. If you are unhappy with our data handling, you can contact the Information Commissioner's Office (ICO) at **[www.ico.org.uk](http://www.ico.org.uk)**.

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