

Rosanna Brown English Tuition

Privacy and Data Protection Policy 2026 – 2027

1. Policy Statement

Rosanna Brown English Tuition is committed to protecting the privacy, confidentiality and security of personal information entrusted to the business by students, parents, carers and prospective clients.

Personal information is processed fairly, lawfully, transparently and only for clear, legitimate purposes, supporting trust and the safe, professional and ethical delivery of educational provision.

This policy explains how Rosanna Brown English Tuition collects, uses, stores, shares, retains and protects personal information; sets out individuals' rights; and confirms compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant UK legislation.

- This policy applies to all services provided by Rosanna Brown English Tuition, including:
 - Home Education English Programme
 - One-to-One online tuition
 - One-to-One in-person tuition
 - Group tuition programmes
 - One-off tuition sessions
 - Assessment and marking services
 - Assessment review sessions
 - Educational visits where applicable
 - Google Classroom and associated digital learning platforms
 - Online teaching platforms
 - Parent and student communication systems
 - Administrative and business operations connected with the delivery of tuition.
- This policy should be read alongside the:
 - Safeguarding Policy
 - Behaviour and Conduct Policy
 - Health and Safety Policy
 - Terms and Conditions applicable to each service
 - Any other policies issued by Rosanna Brown English Tuition.
- Effective data protection is both a legal obligation and an important part of safeguarding, professional integrity and high-quality educational provision.
- Rosanna Brown English Tuition processes personal information lawfully, fairly, transparently and securely, collecting only what is necessary, retaining it only as long as required, and protecting it through appropriate organisational and technical measures.

2. Scope of this Policy

- This policy applies to all personal information processed by Rosanna Brown English Tuition in connection with the provision of educational services.
- This includes information relating to:
 - prospective students
 - current students
 - former students
 - parents and legal guardians
 - emergency contacts
 - individuals making enquiries about services
 - examination candidates where applicable
 - professionals who communicate with the tutor regarding a student's education where authorised by the parent or legal guardian.
- The policy applies regardless of whether information is held:
 - electronically
 - in paper format
 - within secure cloud-based storage
 - on approved educational platforms
 - within email systems
 - within business administration records
 - within financial records
 - within safeguarding records
- The policy applies throughout the lifecycle of a student's relationship with Rosanna Brown English Tuition, from an initial enquiry through to the secure disposal of records following the conclusion of services.

3. Data Controller

- For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, Rosanna Brown English Tuition is the Data Controller responsible for determining the purposes and means by which personal information is processed.
- Questions regarding this policy or the processing of personal information may be directed to:

Rosanna Brown English Tuition

Email: rosannabrownenglishtuition@outlook.com

- As a sole trader, Rosanna Brown is personally responsible for ensuring that personal information is processed in accordance with applicable data protection legislation and professional standards.
- Rosanna Brown English Tuition processes personal information only where there is a lawful basis to do so under UK GDPR. In most cases this will be because processing is necessary to

provide educational services, fulfil contractual obligations, comply with legal responsibilities, protect vital interests or, where appropriate, with the consent of the individual concerned.

- Rosanna Brown English Tuition regularly reviews policies, procedures and working practices to ensure continued compliance with legal obligations and to maintain the confidence of students and families.
- This responsibility includes processing personal information lawfully, maintaining confidentiality and security, protecting children's information, keeping accurate records, responding to data protection requests, retaining and disposing of information appropriately, and keeping data protection and safeguarding knowledge up to date.
- If additional tutors, administrative staff or contractors are engaged in the future, they will be expected to comply with this policy and any relevant confidentiality requirements.

4. Categories of Personal Information Collected

- The categories of personal information collected will vary according to the services being provided. Only information necessary for the safe, lawful and effective delivery of educational services will be requested.
- Parent or Guardian information may include:
 - full name
 - postal address where relevant
 - email address
 - telephone number
 - preferred communication methods (such as email, text message and social messaging platforms)
 - communication records
 - emergency contact details
 - payment and financial information
 - booking history
 - invoices and payment records
 - correspondence relating to tuition
 - consent forms where applicable.
- Student information may include:
 - full name
 - date of birth
 - age
 - school year
 - educational setting where applicable
 - examination board and qualification details
 - educational history and previous educational experience
 - previous, diagnostic and baseline assessment information
 - attainment data and assessment outcomes
 - attendance records

- academic progress records and progress reviews
 - homework submissions and completion records
 - written work and lesson notes
 - assessment feedback and written feedback
 - tutor observations
 - learning targets and personalised learning targets
 - personalised curriculum plans and records of curriculum coverage
 - examination preparation and planning records
 - behaviour records where appropriate
 - safeguarding information where necessary.
- Where students participate in the Home Education English Programme, additional educational information may be processed, including:
 - long-term learning plans
 - independent learning records and activities
 - educational reports
 - learning resources allocated through Google Classroom or equivalent platforms.
 - Educational records are treated as confidential and accessed only where necessary for the delivery of tuition. Parents may request access to educational records relating to their child, subject to applicable legal requirements.
 - Parents and students are expected to support good data protection practice by providing accurate information, updating relevant details promptly, using communication and learning platforms responsibly, protecting login details, respecting the privacy of others, and following the policies relating to confidentiality, recording, photography and online learning.
 - Parents should ensure that any information shared with the tutor about another individual is provided lawfully and appropriately. Parents and students must also respect the confidentiality and privacy of other students and families by not sharing, discussing or disclosing another family's personal information, educational circumstances, safeguarding matters or other confidential information obtained through tuition, group sessions or communications, unless authorised or required by law.

5. Special Category Data and Safeguarding

- Rosanna Brown English Tuition may process Special Category Data where necessary for safe, personalised tuition.
- This may include relevant health, SEND, accessibility, safeguarding or welfare information.
- It is processed only where UK GDPR permits and is kept confidential, secure and limited to what is necessary.
- Where safeguarding concerns arise, the Safeguarding Policy takes precedence where information must be processed or disclosed to protect the welfare, safety or wellbeing of a child or vulnerable person.
- Families will normally be informed before information is shared, unless doing so could increase risk or be inappropriate.

6. How Personal Information Is Collected

- Personal information is collected directly from parents, guardians, students and, where appropriate, authorised education professionals.
- Information may be collected before, during or after tuition where needed for educational, contractual, legal or safeguarding purposes.
- Collection may happen through enquiries, consultations, booking or enrolment forms, tuition sessions, assessments, payments, communications, learning platforms, homework, progress reviews, educational visits or other relevant interactions connected with tuition.
- Personal information is collected, recorded, stored, used and shared only where necessary to arrange and deliver tuition, manage communication, payments and records, provide educational feedback and fulfil legal or safeguarding responsibilities.
- Information may be processed where required by law, including for financial and tax records, legal proceedings, safeguarding or statutory requests.

7. How Personal Information Is Used

- Personal information is used only where necessary to deliver tuition, manage learning, communicate with families, administer records and payments, meet safeguarding responsibilities and comply with the law.
- Rosanna Brown English Tuition does not use personal information for automated decision-making or profiling.
- Personal information is never sold or shared for commercial marketing purposes.

8. Online Learning Platforms, Third-Party Providers and International Transfers

- Rosanna Brown English Tuition uses secure digital platforms and carefully selected third-party providers to support teaching, communication, administration, online lessons, document storage and payment processing.
- These may include Google Classroom, Google Workspace, Google Drive, Google Meet, Zoom, Microsoft Office applications, secure cloud storage, email, WhatsApp Business or WhatsApp messaging, video conferencing, scheduling, accounting and secure payment services.
- Only information necessary for the relevant service or platform will be used, and parents and students are expected to use digital platforms responsibly and in accordance with any guidance provided.
- Where third-party providers process personal information on behalf of Rosanna Brown English Tuition, reasonable steps are taken to ensure they maintain appropriate privacy, security and data protection standards.
- Some approved technology providers may process or store information outside the UK; where this occurs, reasonable steps will be taken to ensure appropriate safeguards are in place in accordance with UK GDPR.

9. Session Recording, Photography and Audio Recording

- Rosanna Brown English Tuition may record lessons, photographs or audio only where there is a clear educational, safeguarding or quality assurance purpose.

- Any tutor-led recording will be stored securely, accessed only where necessary, retained only for as long as reasonably required and will not be used for marketing without separate written consent.
- Students and families must not record, photograph, screenshot, share or distribute lessons, materials or personal information without prior written permission from the tutor.
- Any concerns or unauthorised recording, sharing or misuse of lesson materials will be managed in accordance with the Behaviour and Conduct Policy and may also be addressed under safeguarding, contractual or legal responsibilities where appropriate.

10. Confidentiality

- Rosanna Brown English Tuition treats all personal information as confidential and handles it with sensitivity, professionalism and respect.
- Confidential information will be accessed or discussed only where there is a legitimate need to know for the delivery of tuition, administration, safeguarding, legal compliance or another lawful purpose.
- Parents may discuss matters relating to their own child but will not be provided with confidential information relating to another student.
- Confidentiality may be limited where information sharing is required or permitted by law, safeguarding responsibilities or another lawful basis, as set out in the information sharing and safeguarding sections of this policy.

11. Sharing Personal Information

- Personal information may be shared only where there is a lawful basis and it is necessary, proportionate and appropriate to do so.
- This may include sharing information:
 - where necessary to deliver educational services
 - where required to fulfil contractual obligations
 - where parents request or authorise educational information to be shared with a relevant professional, organisation or examination centre involved in the child's education
 - where disclosure is required by law
 - where safeguarding responsibilities require disclosure
 - where necessary to establish, exercise or defend legal claims
 - where necessary to protect the vital interests of a child or another individual.

12. Safeguarding and Information Sharing

- Protecting the welfare of children and young people remains the highest priority.
- Whilst Rosanna Brown English Tuition is committed to maintaining confidentiality wherever possible, there are circumstances in which safeguarding responsibilities require personal information to be shared without consent. Examples may include concerns regarding:

- abuse
 - neglect
 - emotional harm
 - sexual exploitation
 - criminal exploitation
 - domestic abuse
 - radicalisation
 - serious self-harm
 - significant risk to life or safety
 - any circumstance where a child or vulnerable person may be at risk of harm.
- Where a safeguarding concern arises, information may be shared with:
 - Children's Social Care
 - the Police
 - Local Authority safeguarding teams
 - health professionals
 - other agencies with statutory safeguarding responsibilities
 - The tutor will exercise professional judgement when determining whether information sharing is necessary and will act in accordance with current safeguarding guidance and legal responsibilities.
 - Where appropriate and safe to do so, parents will normally be informed before information is shared. However, information may be disclosed without prior notification where informing a parent could:
 - place a child at increased risk
 - compromise a safeguarding investigation
 - prejudice criminal proceedings
 - be contrary to legal advice
 - otherwise be inconsistent with statutory safeguarding responsibilities
 - Only information necessary for safeguarding purposes will be disclosed.
 - Safeguarding considerations will always take precedence over ordinary expectations of confidentiality where required to protect a child.

13. Information Security, Passwords and Secure Working Practices

- Rosanna Brown English Tuition takes reasonable organisational and technical steps to protect personal information against accidental loss, unauthorised access, misuse, disclosure, alteration or destruction.
- Access to personal information is limited to those with a legitimate need, and security arrangements are reviewed periodically to ensure they remain appropriate.

- Secure working practices may include password-protected devices, confidential passwords, locking devices when unattended, multi-factor authentication where available, secure cloud storage, prompt software updates, appropriate security features, restricted access, avoiding unnecessary copies, secure storage and destruction of paper records, and reasonable care when accessing personal information outside the primary place of work.

14. Retention of Personal Information

- Rosanna Brown English Tuition retains personal information only for as long as reasonably necessary for tuition, progress monitoring, legal, safeguarding, business record, dispute or legal-claim purposes.
- When information is no longer required, it will be securely deleted, anonymised or destroyed. Retention periods may vary depending on the nature of the information and any legal, safeguarding, contractual or professional requirements.

Data Retention Schedule

Record Type	Typical Retention Period
Enquiries that do not lead to tuition	Up to 12 months
Student educational records (including attendance, progress, assessments and parent correspondence)	Up to 6 years after tuition ends
Homework, submitted work and session recordings	Only as long as reasonably necessary for the relevant purpose
Financial records	6 years plus the current financial year, or longer if required by HMRC
Safeguarding records	As long as reasonably necessary in line with safeguarding guidance and legal obligations

15. Individual Rights and Subject Access Requests

- Individuals have rights under UK data protection legislation, including the right to be informed, access their personal information, request rectification or erasure in certain circumstances, restrict or object to processing, data portability where applicable, and rights relating to automated decision-making.
- Not all rights apply in every circumstance. Requests, including subject access requests, should normally be made in writing to Rosanna Brown English Tuition at rosannabrownenglishtuition@outlook.com.
- Reasonable steps may be taken to verify identity before information is disclosed. Where a request concerns a child, consideration will be given to the child's age, maturity and rights, parental responsibility, safeguarding considerations and any legal restrictions on disclosure.

- Requests will be considered carefully and responded to without undue delay, normally within one calendar month. Information may be withheld where permitted by law, including where disclosure would adversely affect another person's rights and freedoms or another legal exemption applies.

16. Personal Data Breaches

- As the Data Controller, Rosanna Brown English Tuition will respond promptly to any suspected personal data breach, including accidental loss, unauthorised access, disclosure, alteration or destruction of personal information.
- Reasonable steps will be taken to contain the incident, assess any risk to affected individuals, record the breach, minimise harm and notify the Information Commissioner's Office or affected individuals where legally required.
- Lessons learned from any breach will be used to strengthen future information security arrangements.

17. Complaints

- Rosanna Brown English Tuition aims to process all personal information fairly, securely and transparently.
- If an individual has concerns regarding the way personal information has been handled, they are encouraged to raise those concerns directly with the tutor in the first instance (in accordance with the Complaints Policy) so that the matter can be considered and, where appropriate, resolved promptly.
- Concerns may relate to:
 - access to personal information
 - accuracy of records
 - confidentiality
 - information sharing
 - security of personal information
 - compliance with this policy
 - any other aspect of data protection.
- Every reasonable effort will be made to investigate complaints fairly and respond within a reasonable timescale.
- Where an individual remains dissatisfied following discussion with the tutor, they have the right to raise the matter with the Information Commissioner's Office (ICO).

Information Commissioner's Office

Website:

<https://ico.org.uk>

Telephone:

0303 123 1113

The ICO is the United Kingdom's independent authority responsible for upholding information rights and enforcing data protection legislation.

18. Monitoring and Review

- This policy is reviewed regularly to ensure that it remains accurate, effective and consistent with:
 - UK data protection legislation
 - safeguarding requirements
 - professional tutoring standards
 - developments in technology
 - changes to educational practice
 - operational changes within Rosanna Brown English Tuition
- The tutor reserves the right to amend this policy where necessary.
- Where significant changes are made, the updated policy will be made available to parents and students before, or as soon as reasonably practicable after, implementation.
- Minor administrative or formatting amendments may be made without formal notification where they do not materially affect the way personal information is processed.

19. Related Documents

- This Privacy and Data Protection Policy should be read alongside the following documents issued by Rosanna Brown English Tuition:
 - Safeguarding Policy
 - Behaviour and Conduct Policy
 - Health and Safety Policy
 - Home Education English Programme Terms and Conditions
 - One-to-One Online Tuition Terms and Conditions
 - One-to-One In-Person Tuition Terms and Conditions
 - Group Tuition Terms and Conditions
 - Specialist Feedback Services Terms and Conditions
 - Any future policies relating to complaints, online safety or educational provision
- Together these documents form the policy framework governing the safe, lawful and professional operation of Rosanna Brown English Tuition.

20. Policy Review

Effective From: September 2026

Review Date: September 2027

Next Scheduled Review: Annually, or sooner where required by changes in legislation or operational practice.