Privacy and Cookies Policy

Version 3 • 22 November 2026

First Tutoring is the trading name of Forest 1st Tutoring Limited.

Policy owner: Director / Privacy Contact

Applies to: Students, parents and carers, applicants, employed and self-employed professionals, commissioners and website users

Previous version: Version 2 – May 2026

Status: Draft based on First Tutoring's stated arrangements. Complete the publication checks in Appendix B before approval.

Review: Annually and whenever material legal, operational or system changes occur

1. About this policy

At First Tutoring, your privacy is extremely important to us. We are committed to safeguarding the privacy and security of all personal information provided to us and we want to be open and transparent about what we do with your data and why.

This policy explains the types of personal information we collect, how we collect, use, share and protect it and the rights available to individuals under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and other relevant UK law, including the Data (Use and Access) Act 2025. The Cookies Policy appears in Part B.

This policy covers our private tuition, alternative provision, mentoring, educational and specialist assessments, speech and language therapy and other therapeutic services, recruitment and administration. It applies to services delivered in person and online across the south of England.

2. Who is responsible for your information?

Forest 1st Tutoring Limited, trading as First Tutoring, is generally the data controller for personal information it processes for its own services, employment, recruitment, safeguarding and administration. In some commissioned arrangements, a school or local authority may also be a controller or First Tutoring may act as a processor for particular activities. The correct arrangement depends on the contract and how decisions about the information are made.

The Director currently handles privacy enquiries and information rights requests. Enquiries may be made to office@first-tutoring.co.uk or by telephone on 01794 733043. Our website is www.first-tutoring.co.uk.

First Tutoring is registered with the Information Commissioner's Office (ICO). Formal statutory Data Protection Officer status should not be assumed from the Director's role: whether designation is required or appropriate will be confirmed through the company's governance review.

3. Information we collect

3.1 Students and families

We collect and process information needed to understand each student's needs, arrange support and monitor progress. This can include:

- Names, contact details, age, date of birth, year group, attendance, timetable and placement details.
- Academic history, attainment, lesson reports, progress summaries, assessment results and feedback.
- Special Educational Needs and Disabilities (SEND), Education, Health and Care Plans (EHCPs), reasonable adjustments and additional support requirements.
- Health and therapy information, disability-related information, welfare details, family circumstances, relevant behaviour, exclusions and suspensions and safeguarding information where necessary.
- Parent or carer names, contact details, communications, bookings, billing and payment information.
- Images, videos and online lesson recordings where used and information about permission for promotional photography.

3.2 Tutors, therapists, mentors and other professionals

We collect tutor and professional contact information such as name, address, email address and telephone number to communicate about our services and schedule sessions. We collect qualifications, experience, professional registration where applicable, availability, insurance and feedback to assess suitability and offer appropriate placements. We may also retain contracts, placement acceptance records, invoices and performance-related information.

3.3 Applicants and recruitment

For recruitment and safer recruitment we may collect names and contact details, date of birth, identity documents, employment and education history, qualifications, references, right-to-work evidence and DBS information. This is used only for relevant recruitment, suitability, safeguarding and compliance purposes.

3.4 Employees and business contacts

We collect personnel, payroll, pension, sickness, leave and other HR information about employees. We also hold the contact and commissioning details of representatives at schools, local authorities, suppliers and other organisations.

3.5 Website use

When you visit our website or submit an enquiry, we may receive contact details, enquiry content, device and browser information and information collected through cookies and similar technologies. See Part B for more details.

4. Where information comes from

We receive information directly from students where appropriate, parents or carers, tutors and applicants. We may also receive it from local authorities, schools and other education establishments, healthcare and therapy professionals, previous employers, referees, regulatory or safeguarding bodies and technology providers acting on our instructions.

5. How and why we use information

We use the information we collect to deliver tuition, alternative provision and therapeutic services, fulfil our arrangements with students, families, schools and local authorities, communicate about sessions and placements, monitor student progress, meet safeguarding obligations, assess professional suitability, administer payments and improve our services.

UK data protection law requires us to identify an appropriate lawful basis for each purpose. Depending on the circumstances, the following bases may apply:

Responding to enquiries and providing services to a contracting parent or professional: Contract or steps requested before a contract; legitimate interests for associated administration where appropriate

Organising commissioned AP, sharing relevant educational updates and coordinating placements: Legitimate interests in delivering appropriate services and meeting commissioning requirements, or another basis identified for the particular arrangement

Safeguarding and meeting mandatory reporting duties: Legal obligation where one applies; legitimate interests and vital interests where relevant

Recruitment, safer recruitment, employment and contractor administration: Steps before a contract, contract, legal obligation or legitimate interests depending on the purpose

Billing, accounting and legal compliance: Contract, legal obligation or legitimate interests as appropriate

Optional publicity and non-essential website technologies: Consent where First Tutoring relies on consent, subject to applicable cookie exemptions

Consent is used only where it is an appropriate lawful basis. When we rely on consent, it can be withdrawn at any time. Withdrawing consent does not affect processing already carried out lawfully. We do not treat parental consent as a general condition for responding to a safeguarding concern.

6. Special category information and DBS records

We may process information about health, disability, therapy and support needs. Some of this is special category information under the UK GDPR. Depending on the circumstances, we rely on an appropriate Article 6 lawful basis and an additional Article 9 condition such as explicit consent, provision of health or social care by or under the responsibility of a professional subject to confidentiality obligations, safeguarding in the substantial public interest or the establishment, exercise or defence of legal claims. The applicable condition is assessed and documented for the relevant processing activity.

DBS checks and criminal offence information are treated separately under Article 10 of the UK GDPR and the Data Protection Act 2018. Access to criminal offence information must be justified, appropriately controlled and limited to authorised safer recruitment responsibilities. First Tutoring maintains verification records as evidence of relevant checks.

Where required for reliance on a Data Protection Act 2018 Schedule 1 condition, First Tutoring will maintain an Appropriate Policy Document describing its safeguards, retention and deletion arrangements. This is a separate internal compliance document.

7. Sharing information

We may share relevant information with the following categories of recipients where necessary and lawful:

- Tutors, therapists, mentors and teaching assistants assigned to a student so that they can prepare and deliver support.
- Parents and carers to provide appropriate updates, progress reports and practical information, subject to the young person's rights, confidentiality and safeguarding considerations.
- Schools, local authorities, Pupil Referral Units, alternative provision partners and commissioners to arrange and review support, report progress and meet appropriate safeguarding or contractual responsibilities.
- Health professionals, social care services, safeguarding partners, police and other competent bodies where necessary to protect individuals or comply with the law.
- IT, recruitment, learning-platform and payment service providers that support our operations, subject to appropriate contractual and data protection safeguards.
- Professional advisers, insurers, auditors and regulators where there is an appropriate lawful reason.

Therapeutic assessments and reports are ordinarily provided to the commissioning school or local authority. If a parent or carer asks for a report, we normally consult the commissioner before sharing it, but we assess statutory access rights independently and do not treat commissioner permission as overriding those rights. We consider the child's competence, confidentiality, third-party information and applicable exemptions.

We do not sell or rent personal information to third parties for marketing purposes. We do not share one client's information with another client without an appropriate lawful basis.

8. Systems, access and security

We use third-party platforms to operate our services. The systems currently used include:

TutorCruncher: Student, parent and professional records, placement information and documents. Professionals access records relating to the young people they support.

Total Onboarder: Applications, safer recruitment, onboarding and professional vetting documents, including scanned DBS certificates.

Microsoft 365 / SharePoint: Operational, educational, HR, therapy and safeguarding documents and verification registers.

Xero and Stripe: Accounting, billing and payment processing. Xero is accessible to the Director and finance officers.

Wix: Website management, enquiries and the cookie consent interface, accessed by designated administrative and leadership roles.

Zoom: Online meeting platform, currently administered by the Director.

Bobbin with LessonSpace: Online teaching and safeguarding platform. Online sessions are recorded and recordings are held in Bobbin.

Studybugs: Attendance information for relevant commissioned provision, accessed by designated office and AP roles.

Access is assigned according to current job responsibilities. At present, some information in SharePoint, Total Onboarder, TutorCruncher and Bobbin is accessible to the AP and office teams. First Tutoring is reviewing access

permissions so that information, particularly therapy, safeguarding and DBS records, is available only where it is needed for an individual's role.

We use appropriate technical and organisational measures intended to protect information, including account permissions, authentication, secure storage and staff guidance. No electronic system can be guaranteed completely secure. Professionals who download student documents from their allocated TutorCruncher folders are instructed to delete local copies when they have finished reading them and no longer need them. This practice is subject to ongoing review to limit unnecessary downloads.

Financial information in Xero is accessed by the Director and designated finance officers. Staff access to systems is removed or disabled promptly when they leave or no longer require it. Their historical personnel and vetting records are handled under the retention arrangements set out below rather than being deleted automatically when access ends.

9. Safeguarding and therapy records

Higher-level safeguarding concerns are recorded in documents and stored in the Leadership and Management area of SharePoint. Arrangements are being made for the Deputy Designated Safeguarding Lead to have appropriate access to support safeguarding continuity. Lower-level concerns may be recorded within Alternative Provision records or TutorCruncher. All safeguarding information must be escalated and reviewed in line with the Safeguarding Policy and access must remain proportionate to need.

Therapeutic reports, assessments and clinical notes are currently stored in SharePoint and may be accessible to AP, office and leadership staff. First Tutoring intends to apply more granular permissions, particularly to detailed psychotherapy notes. Safeguarding and clinical records are subject to longer or specialist retention considerations than routine tuition information.

10. Online tuition, recordings and photographs

Online lessons are delivered using LessonSpace linked with Bobbin. Sessions are recorded and recordings are retained within Bobbin. Recordings may be accessed by designated AP and office personnel for appropriate operational, safeguarding and quality purposes. Students and families should be informed about recording before sessions take place. Recording retention periods, permissions, any downloads and provider arrangements will be confirmed in the associated operational schedule.

First Tutoring may take photographs or short videos to record activities or for publicity. At present, permission may be obtained verbally or recorded through the relevant TutorCruncher parent or carer permissions field. Before identifiable images of a child are published for promotional purposes, First Tutoring should have a documented lawful basis, an appropriate safeguarding assessment and a reliable record of permission. Individuals can contact us to raise concerns or withdraw consent where consent is the basis relied upon.

11. AI-assisted administration

Authorised staff may use AI-assisted tools, including Microsoft tools, to help draft documents, summaries or educational materials. First Tutoring's stated practice is to remove names and other identifying information before entering material into AI tools. Staff must also check that contextual details cannot reasonably identify a young person. Confidential safeguarding, therapy and other identifiable personal information should not be entered into an unapproved AI service. AI-assisted outputs are checked by a member of staff before use or sharing.

12. International transfers

Some of our technology providers may store or access information outside the United Kingdom. Where personal information is transferred internationally, we will assess the provider's arrangements and rely on an appropriate legal mechanism where required, such as UK adequacy regulations or recognised contractual safeguards. Information about the relevant safeguards can be requested using the contact details in this policy. The locations and safeguards of individual providers remain subject to verification.

13. Data retention

We retain information only for as long as it is necessary for the purpose for which it was collected, including legal, accounting, reporting, therapeutic and safeguarding responsibilities. Different categories require different retention periods. First Tutoring is introducing a documented Data Retention Schedule and a process to review and securely delete or anonymise information when it is no longer needed.

As a general starting point, routine student and parent tuition records will be reviewed for deletion around three years after support ends, subject to any contractual or legal requirement. Staff and contractor files will generally be reviewed six years after the relationship ends, with different rules for right-to-work evidence, payroll, DBS certificates, safeguarding and other special records. Child protection records may require substantially longer retention. The detailed draft schedule appears in Appendix A.

Existing historical records are being brought within this retention approach. Where a complaint, safeguarding investigation, legal claim or other lawful reason requires further retention, disposal may be suspended and the reason documented. Commissioning agreement requirements will be checked when available.

14. Your data protection rights

Under applicable law you may have the following rights. Some rights are subject to conditions and exemptions:

- Access: to request copies of your personal information and relevant information about its use.
- Rectification: to ask us to correct inaccurate information or complete incomplete information.
- Erasure: to ask us to delete information in circumstances where the right applies.
- Restriction: to ask us to limit particular processing in certain circumstances.
- Objection: to object to processing based on legitimate interests or other applicable grounds.
- Data portability: in certain circumstances to receive information in a portable form or have it transferred.
- Withdrawal of consent: where consent is our lawful basis, to withdraw it at any time.
- Rights relating to solely automated decisions, if relevant: to receive the protections available under applicable law.

Please send requests to office@first-tutoring.co.uk. We may need to verify identity and authority before releasing information, especially where a request involves a child or another person's records. We normally respond within one month, subject to lawful extensions and exemptions. Young people may exercise their own information rights where they have sufficient understanding. A parent's authority to request a child's information is assessed case by case.

15. Data breaches and complaints

15.1 Data incidents

If a personal data breach is suspected or identified, we will assess the incident promptly, contain the risk where possible and document the outcome. Where the breach is likely to result in a risk to individuals' rights and freedoms, we will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where the breach is likely to result in a high risk, we will also notify affected individuals without undue delay, unless an applicable exception applies.

15.2 Complaints

If you have concerns about our use of your personal information, you can complain by emailing office@first-tutoring.co.uk or contacting the office. The Director currently handles complaints and information rights requests. We will provide an accessible route for complaints, acknowledge a data protection complaint within 30 days, investigate it appropriately, keep you informed about progress and explain the outcome without undue delay.

You can also complain to the Information Commissioner's Office (ICO). Its website is www.ico.org.uk and its helpline is 0303 123 1113. Postal address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

Part B. Cookies Policy

16. About cookies

This Cookies Policy applies to www.first-tutoring.co.uk. To make our website function properly and improve the visitor experience, small data files called cookies and similar technologies may be placed on your device.

Cookies can remember preferences or help a website understand how it is used. They may operate for a single browsing session or for a longer period. Some are set by the website provider while others may be set by third-party services used on the site.

17. Why we use cookies

Our Wix website uses a cookie banner that allows visitors to accept or reject categories of cookies. The categories relevant to website operation may include:

Essential / necessary: Help provide core website functions, security and consent preferences. These may not require consent where a lawful exemption applies.

Functional / preferences: Remember visitor choices or enable optional features. Consent or an applicable exemption is required depending on the purpose.

Analytics / performance: Help us understand website use and improve the service. Qualifying statistical uses may operate without consent only when the legal conditions are met and visitors have a simple, free way to object.

Marketing / advertising: If used, support promotional measurement or targeted advertising. These generally require prior consent for non-essential tracking.

The exact cookie names, providers, purposes and durations depend on the live Wix configuration and any connected tools. A current cookie inventory should be made available through the website or a linked cookie declaration after verification. We do not claim that categories not enabled on the site are in active use.

18. Choosing and changing cookie settings

You can use the cookie banner or cookie settings on our website to choose whether to accept or reject non-essential cookies. Where consent is required, cookies must not be set before a valid choice is made and you should be able to change or withdraw that choice. Certain lawful exceptions may apply, including strictly necessary functions and qualifying statistical or appearance-related uses with the required opportunity to object.

You can also delete or block cookies through your browser settings. Disabling some cookies may limit the functionality of the website or mean that your preferences are not remembered. Continued use of the website does not by itself constitute consent to non-essential cookies.

19. Policy updates and contact

We may update this policy when our services, suppliers, legal obligations or website technologies change. Material changes will be made available through our website. Please check the latest version periodically.

For privacy or cookies enquiries, please email office@first-tutoring.co.uk or telephone 01794 733043.

INTERNAL GOVERNANCE APPENDICES

The following appendices support implementation and internal compliance checks. They should be removed before publishing the public-facing privacy and cookies notice on the website.

Appendix A. Proposed internal Data Retention Schedule

These periods are proposed controls to be adopted after checking legal, professional and commissioning requirements. The original Version 3 statement that all student files are deleted 24 months after tuition ends has not been retained. First Tutoring currently holds some records indefinitely and must review existing holdings before representing the new schedule as fully implemented.

Routine student tuition files, lesson notes and general progress records: Review approximately 3 years after the placement ends. Retain longer where necessary for an active concern, contractual requirement or legal reason.

EHCPs, SEND assessments and placement-support documents: Review at closure. Normally align with the routine file period unless safeguarding, education or contractual considerations require otherwise.

Child protection and safeguarding files: Use the school-sector benchmark of retaining until the young person's 25th birthday where appropriate. For child sexual abuse records, the DfE school benchmark is the 75th birthday. Apply a documented decision appropriate to First Tutoring's role.

Therapeutic assessments and clinical notes: Agree clinician-specific retention requirements before disposal. Relevant NHS and professional frameworks may require retention to at least a young person's 25th or 26th birthday or longer.

Bobbin online lesson recordings: PERIOD TO CONFIRM with provider and safeguarding team; set an explicit retention period, access permissions, transparency wording and secure deletion process.

Staff / self-employed contractor personnel files and agreements: Normally review 6 years after leaving, except where statutory, clinical, pension, safeguarding or claim-related periods differ.

PAYE payroll records: At least 3 years after the end of the tax year to which they relate, unless another requirement necessitates longer retention.

Company accounting and invoicing records: Normally retain for at least 6 years from the end of the relevant financial year, subject to specific corporation tax and VAT requirements.

Employee right-to-work evidence: Retain during employment and for 2 years afterwards, then securely destroy in accordance with applicable Home Office guidance.

Full scanned DBS certificate information: Normally destroy within 6 months after a recruitment decision unless a documented exception lawfully justifies longer retention. Current longer storage is a priority for review.

DBS verification register and recruitment decision evidence: Proposed 3 years after leaving, subject to safeguarding and claim-related exceptions; do not retain full certificate content in the verification register.

Unsuccessful recruitment application records: Normally 6 months after decision, with a documented basis if retained longer.

Complaints, incidents and breach logs: Set case-appropriate retention based on seriousness, ongoing legal obligations and limitation periods; document any extended hold.

Publicity consent and images: Retain evidence for the period of use and a proportionate period afterwards; remove images where required following withdrawal or safeguarding assessment.

Appendix B. Checks before approval and publication

The following points are not optional cosmetic changes. They are outstanding compliance or factual checks arising from the discussions used to prepare Version 4.

- Confirm the privacy email. This document uses office@first-tutoring.co.uk because it appears in the existing policy. The spoken reply may have omitted the hyphen. Confirm the correct live mailbox and add the company registered office postal address.
- Confirm whether a statutory Data Protection Officer must be appointed and whether the Director's role creates a conflict of interest. Until checked, refer to the Director as Privacy Contact or Data Protection Lead.
- Check each local authority or school commissioning agreement for controller/processor status, data-sharing clauses, retention requirements and instructions on data return or deletion.
- Restrict access now to full DBS certificates, psychotherapy notes and confidential safeguarding records on a need-to-know basis. Confirm Deputy DSL access to high-level safeguarding files and review Virtual Assistant access.
- Review full scanned DBS certificates retained in Total Onboarder against DBS requirements. Create a separate certificate handling and disposal procedure and document any exceptional retention.
- Confirm how long Bobbin recordings are kept, whether they can be downloaded, how families are informed and what staff roles genuinely need access.
- Introduce a recorded permission and safeguarding check before publishing identifiable photographs of children. Review existing publicity images that relied only on undocumented verbal permission.
- Check that AI tools are approved and that removing a child's name does not leave details that could re-identify them. Document safeguards for external AI tools.
- Confirm the Wix cookie inventory, providers, retention periods, consent behaviour and whether any analytics or advertising integrations are enabled. Ensure rejection works before cookies load where consent is needed.
- Implement a retention review for historical records in SharePoint, TutorCruncher, Bobbin and Total Onboarder. Document who authorises and performs secure deletion.
- Document incident reporting and offboarding checklists across all systems, not only TutorCruncher and SharePoint. Clarify whether WhatsApp or email are used for student information and what controls apply.
- Document the applicable Article 6 lawful basis and Article 9/10 condition for each sensitive processing activity and prepare an Appropriate Policy Document where required. Consider a DPIA for high-risk processing and recording practices.
- Verify international transfer arrangements, processor contracts, confidentiality obligations and relevant provider documentation, including Stripe, Wix, Xero, Bobbin and Total Onboarder.

Appendix C. Principal official sources considered

These references are provided for governance review and are not a substitute for legal advice. Checked 22 November 2026.

Information Commissioner's Office – Data protection complaints (June 2026): https://ico.org.uk/about-the-ico/media-centre/news-and-blogs/2026/06/new-data-protection-complaints-law-now-in-force/

ICO – Guide to lawful basis and special category data: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/a-guide-to-lawful-basis/

ICO – Special category conditions and appropriate policy documents: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/lawful-basis/special-category-data/what-are-the-substantial-public-interest-conditions/

ICO – Cookies and other storage and access technologies: https://ico.org.uk/for-organisations/direct-marketing-and-privacy-and-electronic-communications/guidance-on-the-use-of-storage-and-access-technologies/what-are-the-exceptions/

DBS – Handling certificate information: https://www.gov.uk/government/publications/handling-of-dbs-certificate-information/handling-of-dbs-certificate-information

Department for Education – Data protection in schools, record keeping: https://www.gov.uk/guidance/data-protection-in-schools/record-keeping-and-management

Home Office – Right to work checks: https://www.gov.uk/government/publications/right-to-work-checklist/employers-right-to-work-checklist-accessible-version

Data (Use and Access) Act 2025: https://www.legislation.gov.uk/ukpga/2025/18/contents

Prepared for: First Tutoring • Director approval: _____ • Approval date: _____