

DATA PROTECTION & PRIVACY POLICY

Bury Tuition Centre

Part of North West Education Hub Ltd

1. Introduction and Who We Are

Bury Tuition Centre is a trading name of North West Education Hub Ltd. North West Education Hub Ltd is the Data Controller for personal information processed in connection with Bury Tuition Centre.

We are committed to protecting the privacy and personal information of students, parents/guardians, adult learners, staff and others who engage with the Centre.

We process personal information in accordance with applicable UK data protection law, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025, which amends parts of the UK's data protection framework.

This policy explains the types of information we collect, why we use it, how it is protected and the rights individuals have in relation to their information.

2. Data Protection Principles

We aim to ensure that personal information is:

- processed lawfully, fairly and transparently;
- collected for specified, explicit and legitimate purposes;
- adequate, relevant and limited to what is necessary;
- accurate and, where necessary, kept up to date;
- kept for no longer than necessary; and
- protected using appropriate technical and organisational security measures.

3. Information We Collect

Student / Learner Information

- name, date of birth, gender where provided, school/college and year group;
- contact details where appropriate;
- subjects, tuition requirements, academic information, assessments, targets, progress, tutor feedback and homework information;
- attendance, punctuality and engagement records;
- information about special educational needs, disabilities or additional learning requirements where relevant;
- health, allergy, medication or welfare information needed to support safety and wellbeing;
- safeguarding and child-protection information where relevant;
- collection arrangements and permissions, where applicable;
- photography/video preferences and other permissions where these are collected.

Parent / Guardian and Emergency Contact Information

- name and relationship to the student;
- postal address, email address and telephone number;
- emergency contact details;
- authorised collection information;
- communications with the Centre relating to tuition, attendance, welfare, behaviour, safeguarding or payments.

Financial and Administrative Information

- fees, invoices, credits and payment records;
- information needed to administer bookings and tuition arrangements;
- limited transaction information received from payment providers. The Centre does not need to retain full payment-card details where payments are processed by a third-party payment provider.

Website and Online Enrolment Information

- information submitted through the Bury Tuition Centre online enrolment form;
- technical and security information generated when our website or online services are used, where applicable;
- records showing when required policies, terms or permissions were accepted, including the version/date of the relevant document where the system supports this.

4. Why We Use Personal Information

We use personal information only where we have a lawful reason to do so. Depending on the activity, our lawful basis may include performance of a contract or steps requested before entering a contract, compliance with a legal obligation, legitimate interests, recognised legitimate interests where applicable, vital interests, or consent where consent is the appropriate basis.

Our purposes include:

- processing enquiries and enrolments;
- delivering tuition and supporting learning and progress;
- managing lesson schedules, attendance, punctuality and cancellations;
- communicating with parents/guardians and adult learners;
- managing fees, invoices, payments and financial records;
- supporting student safety, welfare and safeguarding;
- managing behaviour, complaints and incidents;
- meeting legal, regulatory, insurance and accounting obligations;
- maintaining the security and effective operation of our systems and services.

Where we rely on legitimate interests, we consider whether the processing is necessary and balance our interests against the rights and interests of the individual, taking particular care where children's information is involved.

5. Special Category and Sensitive Information

Some information we hold may be particularly sensitive. Health information, for example, is special category personal data under UK GDPR. Safeguarding records may also contain highly sensitive information.

Where special category personal data is processed, the Centre will identify both an appropriate lawful basis and an additional condition permitted by data protection law. Depending on the circumstances, this may include explicit consent or a condition relating to safeguarding or the protection of an individual.

We collect only information that is relevant to the purpose, restrict access to authorised personnel and apply additional safeguards where appropriate.

6. Children's Personal Information

Much of Bury Tuition Centre's work involves children and young people. We recognise that children's personal information requires particular protection.

- We aim to use clear and age-appropriate information where we communicate directly with children.
- We collect only information reasonably required to provide tuition, administer the service and protect students.
- Where we rely on legitimate interests, the interests and rights of the child receive particular consideration.
- Parents/guardians are normally the primary contact for a child enrolled at the Centre, but children retain data protection rights in their own personal information where applicable.

7. How We Collect Information

Personal information may be collected:

- directly from a parent/guardian, student or adult learner;
- through the Centre's online enrolment form and website;
- during tuition, assessments, attendance monitoring and communications;
- from schools, local authorities, professionals or other organisations where there is a lawful and appropriate reason for information to be shared;
- from payment and other service providers where required to administer the service.

8. Storage and Security

We take appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, alteration, disclosure, destruction or unauthorised access.

- access is limited according to role and business need;
- online enrolment and administrative records should be stored in approved, access-controlled systems;
- sensitive SEN, health and safeguarding information is subject to more restricted access;
- paper records containing personal information are kept securely when not in use;
- staff are expected to follow confidentiality, data-protection and safeguarding requirements;
- third-party providers are selected and managed with appropriate data-protection and security considerations.

Sensitive SEN, medical or safeguarding details should not routinely be reproduced in ordinary email notifications where they can instead be accessed securely by authorised staff.

9. Sharing Personal Information

We do not sell personal information. We share information only where there is a lawful and proportionate reason to do so.

Depending on the circumstances, recipients may include:

- IT, website, hosting, communications, payment, accounting or other service providers acting on our behalf;
- tutors and authorised staff who need the information to perform their role;
- schools, local authorities, health professionals or other relevant organisations where appropriate and lawful;
- safeguarding partners, children's services, the police or other authorities where necessary to protect a child or another person;
- professional advisers, insurers, auditors or regulators where required;
- HMRC, courts, law-enforcement bodies or other public authorities where disclosure is required or permitted by law.

Where an external provider processes personal information on our behalf, we seek to ensure appropriate contractual and security arrangements are in place.

10. International Transfers

Some technology or service providers may store or access information outside the UK. Where personal information is transferred internationally, we will take appropriate steps to ensure that a lawful transfer mechanism and suitable safeguards are in place where required.

11. Photography, Video and Marketing

Photography and video permissions are managed separately from the core enrolment terms. We will respect the preference recorded for the student and will not treat consent to external promotional photography/video as a condition of receiving tuition.

Where consent is relied upon, it may be withdrawn for future use. Withdrawal does not make earlier lawful processing unlawful and may not always enable the Centre to retrieve material that has already been lawfully published or distributed.

We do not sell personal information for marketing purposes.

12. Retention of Information

We keep personal information only for as long as it is reasonably required for the purpose for which it was collected and to meet legal, safeguarding, accounting, insurance or dispute-resolution requirements.

- financial and accounting records are normally retained for at least the period required by applicable tax and accounting rules;
- safeguarding and child-protection records may need to be retained for longer periods in accordance with safeguarding requirements and the nature of the record;
- student and administrative records are reviewed against the Centre's retention requirements rather than being kept indefinitely;
- information that is no longer required will be securely deleted, destroyed or anonymised as appropriate.

The Centre should maintain a more detailed internal retention schedule for different categories of records. This policy does not create a requirement to keep every student record for a fixed seven-year period.

13. Your Data Protection Rights

Depending on the circumstances and the lawful basis being used, individuals may have rights to:

- request access to their personal information;
- ask for inaccurate or incomplete information to be corrected;
- request erasure of information in certain circumstances;
- request restriction of processing in certain circumstances;
- object to certain processing;
- receive certain information in a portable format where the right to data portability applies;
- withdraw consent at any time where processing is based on consent;
- raise a concern or complaint about how their personal information is being used.

These rights are not absolute and exemptions may apply. We may need to verify identity before responding to a request. We will respond within the timeframe required by data protection law.

14. Personal Data Breaches

A personal data breach may include the accidental or unlawful loss, destruction, alteration, unauthorised disclosure of, or access to personal information.

Where a breach occurs, Bury Tuition Centre / North West Education Hub Ltd will assess and contain it, record the incident and take appropriate remedial action. Where notification to the Information Commissioner's Office is required, this will be made without undue delay and, where feasible, within 72 hours of becoming aware of the breach. Individuals will also be informed without undue delay where the law requires this because of a high risk to their rights and freedoms.

15. Contact and Complaints

Data Protection Lead: Nazia Younis

Email: info@northwesteducationhub.co.uk

Phone: 07493 027681

If you have a question about this policy, wish to exercise a data protection right or have a concern about how your information has been handled, please contact the Data Protection Lead in the first instance.

You also have the right to raise a concern with the Information Commissioner's Office (ICO), the UK's data protection regulator. Current contact information is available at www.ico.org.uk.

16. Changes to this Policy

We may update this policy to reflect changes to our services, systems, legal requirements or data-protection practices. The current version should be made available through the Bury Tuition Centre website and, where appropriate, linked from the online enrolment process.



Document Information

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Next Review Due	August 2027
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