



Data Protection (GDPR) Policy

How we collect, use, protect and share personal data

Version 1.0 · 03/07/2026

1. Purpose and roles

Swale Tutoring Service is committed to protecting the personal data of pupils, parents/carers, tutors, staff and partner organisations. Swale Tutoring Service Ltd is the data controller. The Director/DSL has overall responsibility for data protection. Swale is registered with the Information Commissioner's Office (ICO).

2. Scope

This policy applies to all personal data processed by Swale, in electronic, paper or verbal form, by any member of staff.

3. The data protection principles

Swale processes personal data so that it is:

- Processed lawfully, fairly and transparently
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accurate and kept up to date
- Kept no longer than necessary (see Data Retention & Erasure Policy)
- Processed securely, protecting against unauthorised processing, loss or damage

4. Information we hold and why

Swale holds contact details, educational information, EHCP and SEND information, safeguarding records, and financial/contractual data, in order to deliver tuition, meet safeguarding duties, and fulfil contracts with families and local authorities.

5. Lawful basis

Personal data is processed on the basis of contract, legal obligation, legitimate interests, and (where required) consent. Special-category data (such as health and SEND information) is processed under an additional condition, typically substantial public interest or safeguarding, and vital interests in an emergency.

6. Security

- Access is restricted on a need-to-know basis; safeguarding records are held separately with restricted access.
- Devices and accounts are password-protected, and multi-factor authentication is used where available.
- Personal data is not stored on personal devices or unapproved cloud services.
- Paper records are kept securely and not left unattended.

7. Sharing information

Information is shared only where there is a lawful reason — a legal obligation, a contractual need, or to safeguard a child. Safeguarding information is shared in line with the Safeguarding & Child Protection Policy, including without consent where necessary to protect a child.

8. Individual rights

Individuals have the right to be informed, and to access, rectify, erase, restrict, object to, and port their data. Requests are handled under the Subject Access Request Policy and responded to within one month.

9. Breaches

Any actual or suspected personal-data breach is reported and managed under the Data Breach Policy, including the duty to notify the ICO within 72 hours where required.

10. Staff responsibilities and training

All tutors and staff must comply with this policy, complete data-protection awareness training, and sign the GDPR declaration. Breaches of this policy may be treated as a disciplinary matter.

11. Review

This policy is reviewed annually or sooner if the law or guidance changes.

Approved by Shelley Wilson, Director & Designated Safeguarding Lead.
Version 1.0 · Approved 03/07/2026 · Reviewed annually.