



RSP Tutors – GDPR & Privacy Policy

Last reviewed: June 2026

Reviewed by: Rob Sadler Penn, Director

Date of next review: June 2027

RSP Tutors (“we”, “us”, “our”) is committed to protecting the privacy and personal data of all students, parents, tutors, and partners. This Privacy Policy explains what information we collect, how we use it, our lawful bases for processing, and your rights under the UK GDPR and Data Protection Act (2018).

It is important you read this notice with any other policies so that you are aware how we are processing your information and what your rights are under data protection legislation.

1. Data Controller Contact Details

Data Controller: RSP Tutors Rob Sadler Penn (Founder & Data Protection Lead)

Email: robsadlerpenn@rsptutors.co.site

You may contact us at any time regarding data protection matters.

2. What Personal Data We Collect

We collect and process the following categories of personal data:

For Parents/Guardians

- Full name
- Email address
- Phone number
- Home address (for invoicing or in-person tuition)
- Payment information (processed securely via third-party providers; we do not store card details)
- Communications with us

For Students

- Full name
- Age and school year
- Academic information (subjects, grades, learning needs)
- SEND or medical information where relevant to tuition
- Lesson attendance and progress notes
- Safeguarding information (where necessary)

For Tutors

- Full name
- Contact details
- CV, qualifications, and experience
- DBS certificate details
- Bank details (for payment)
- References and right-to-work documentation

3. How We Collect Personal Data

We collect data in the following ways:

Directly from you

- When you complete an enquiry form
- When you sign up for tuition
- When you communicate with us by email, phone, or Whatsapp
- When tutors apply to work with us

From third parties (where applicable)

- Schools or organisations referring students
- Tutor references
- DBS Update Service (with your permission)

We will always tell you if we obtain your data from a third party.

4. Why We Use Your Personal Data (Purposes of Processing)

We process personal data for the following purposes:

- To provide tutoring services
- To match students with suitable tutors
- To manage bookings, scheduling, and lesson delivery
- To communicate with parents, students, and tutors
- To maintain safeguarding and child protection standards

- To manage invoicing, payments, and financial records
- To comply with legal obligations (e.g., tax, safeguarding, employment law)
- To improve our services and customer experience

5. Lawful Bases for Processing

Under the UK GDPR, we rely on the following lawful bases:

Contractual Necessity

To provide tutoring services, manage bookings, and communicate with you.

Legal Obligation

For safeguarding, tax, accounting, and compliance with UK law.

Legitimate Interests

For:

- Matching students with tutors
- Monitoring lesson quality
- Improving our services
- Keeping internal records
- Ensuring the safety and welfare of students

We always balance our legitimate interests against your rights and freedoms.

Consent

For:

- Processing SEND or medical information
- Sending optional marketing communications
- Recording lessons (where applicable)

You may withdraw consent at any time.

6. Special Category Data

Where relevant to tuition or safeguarding, we may process:

- SEND information
- Medical information
- Safeguarding disclosures

We process this data under:

- **Article 9(2)(a)** – explicit consent
- **Article 9(2)(g)** – substantial public interest (safeguarding of children)

7. Who We Share Personal Data With

We only share personal data when necessary and with appropriate safeguards.

We may share data with:

- Tutors working with your child
- Schools or organisations (where tuition is arranged through them)
- Payment processors (e.g., Stripe)
- IT and software providers (e.g., , email services)
- Safeguarding authorities (where required)
- HMRC or legal authorities (where required by law)

We **never** sell personal data.

All third-party providers are GDPR-compliant and process data only on our instructions.

8. International Transfers

If any third-party service providers store data outside the UK, we ensure:

- Adequacy regulations apply, or
- Standard Contractual Clauses (SCCs) are in place

This ensures your data remains protected.

9. Data Retention – How Long We Keep Your Information

We retain data only for as long as necessary:

Parents & Students

- General records: **6 years** after tuition ends (for tax and legal purposes)
- Safeguarding records: **up to 25 years**, in line with statutory guidance

Tutors

- Application records: **1 year** if unsuccessful
- Employment/contractor records: **6 years** after work ends
- Safeguarding/DBS records: **retained only as required by law**

After these periods, data is securely deleted or anonymised.

10. How We Store and Secure Personal Data

We use secure systems and measures including:

- Encrypted devices and secure cloud storage
- Password-protected accounts
- Access controls (only authorised staff can access data)
- Secure disposal of digital and physical records
- GDPR-compliant third-party platforms

We regularly review our security measures.

11. Your Rights Under UK GDPR

You have the right to:

- Access your personal data
- Correct inaccurate data
- Request deletion (where lawful)
- Restrict processing
- Object to processing based on legitimate interests
- Withdraw consent at any time
- Data portability (where applicable)
- Lodge a complaint with the ICO

Information Commissioner's Office (ICO)

Website: <https://ico.org.uk> Helpline: 0303 123 1113

12. Cookies (If Used on Your Website)

If your website uses cookies, include:

- Essential cookies for site functionality
- Analytics cookies (only with consent)
- A link to your cookie banner or settings

(If you want, I can write a full Cookie Policy too.)

13. Changes to This Policy

We may update this Privacy Policy periodically. The latest version will always be available on our website. Significant changes will be communicated directly to users.

14. Contact Us

For any questions or data requests, contact:

RSP Tutors Rob Sadler Penn – Director