
Privacy Policy

Your privacy is very important to us. Accordingly, we have developed this Policy in order for you to understand how we collect, use, communicate, disclose and make use of personal information. The following outlines our privacy policy.

- As both a data controller and processor we only collect personal information to enable us to determine suitability for assignments and eligibility to work in the UK
- Where necessary we may need to transfer your data to territories outside of those covered by UK adequacy regulations to enable us to determine suitability for assignments and eligibility to work in the UK
- We will collect personal information by lawful and fair means and with the consent of the individual concerned.
- The Personal data we collect will be relevant to the purposes for which it is to be used, and, to the extent necessary for those purposes, will be accurate, complete, and up-to-date as far as possible.
- We hold the following information and at times we may need to pass the following information to our clients;
 - DBS Number
 - DBS Issue Date
 - Information contained on DBS certificate
 - Proof of right to work in the UK (As required by law)
 - Name
 - Address
 - Date of Birth
 - Qualifications
 - References
- We will retain personal information for a minimum of 7 years after the end of your most recent assignment.
- We will protect personal information by reasonable security safeguards against loss or theft, as well as unauthorised access, disclosure, copying, use or modification.
- We will make readily available to our candidates and clients, information about our policies and practices, relating to the management of personal information.
- Winchmore Tutors will comply with the Data Protection Act 2018, UK GDPR, Keeping Children Safe in Education, Working Together to Safeguard Children and other relevant legislation and statutory guidance. Information will be shared lawfully and proportionately, recognising that the protection of children and vulnerable individuals is paramount.
- Individuals can request to have their details removed from our system by contacting the registered data controller who will then review the request, and notify them of the decisions taken.
- All candidates and clients have the following rights;
 - The right to be informed
 - The right of access
 - The right to rectification
 - The right to erasure (subject to legal and safeguarding requirements)
 - The right to restrict processing
 - The right to data portability
 - The right to object
 - The right not to be subject to automated decision-making including profiling
 - The right to complain to the ICO if a problem with our handling of their data is experienced
- Winchmore Tutors do not use automated decision making.

- We reserve the right to record calls for monitoring, training and quality assurance purposes
- For Online Tuition we reserve the right to record lessons for training, monitoring and safeguarding purposes
- Any requests for data should be directed to the Registered Data Controller (RDC) - (rdc@winchmoretutors.com)

Legislative and Statutory Framework

This policy has been developed in accordance with:

- Keeping Children Safe in Education (KCSIE).
- Working Together to Safeguard Children.
- Data Protection Act 2018.
- UK General Data Protection Regulation (UK GDPR).
- The Equality Act 2010.
- The SEND Code of Practice (0-25 years).
- Relevant Information Commissioner's Office (ICO) guidance.

Winchmore Tutors recognises that effective safeguarding, information sharing and data protection are complementary responsibilities. The lawful and proportionate sharing of information is often essential to protect children and promote their welfare.

Safeguarding and Confidentiality

Winchmore Tutors is committed to safeguarding and promoting the welfare of children and young people.

All staff must understand that confidentiality is important but is **not absolute**.

Where information suggests that a child, young person or vulnerable person may be at risk of abuse, neglect, exploitation, significant harm, radicalisation, self-harm or other safeguarding concerns, safeguarding responsibilities take precedence over confidentiality obligations.

Information will be shared with the Designated Safeguarding Lead (DSL), Children's Social Care, the Police, Local Authorities or other relevant agencies where necessary to protect a child or young person.

Staff must never promise a child or young person that information disclosed to them will be kept secret.

Designated Safeguarding Lead (DSL)

Winchmore Tutors has a Designated Safeguarding Lead (DSL) who takes lead responsibility for safeguarding and child protection across the organisation.

Designated Safeguarding Lead

Name: Craig Varney

Deputy Designated Safeguarding Lead

Name: Dan Stagg

The Winchmore Tutor's Child Protection Number is : 01372 940 808

Role of the DSL

The DSL is responsible for:

- Managing safeguarding concerns and referrals.
- Advising staff regarding safeguarding issues.
- Making referrals to Children's Social Care, Police, LADO and other safeguarding agencies.
- Ensuring safeguarding records are maintained securely.
- Overseeing information sharing decisions.
- Promoting a culture of safeguarding throughout the organisation.
- Ensuring compliance with KCSIE and Working Together to Safeguard Children.
- Monitoring safeguarding concerns, trends and outcomes.
- Supporting staff in understanding how safeguarding responsibilities interact with data protection legislation.

Information Sharing

Winchmore Tutors recognises that effective safeguarding relies upon timely and appropriate information sharing.

Information will only be shared:

- Where there is a lawful basis for doing so.
- On a need-to-know basis.
- With people who are authorised to receive it.
- In accordance with Data Protection Act 2018 and UK GDPR requirements.
- In line with safeguarding obligations and statutory guidance.

When making decisions regarding information sharing, staff should consider:

- The child's safety and welfare.
- Necessity and proportionality.
- Accuracy of information.
- Whether consent is required or whether information can be shared without consent due to safeguarding concerns.
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Safeguarding concerns should never be withheld because consent has not been obtained where a child may be at risk of harm.

Multi-Agency Information Sharing

Winchmore Tutors works collaboratively with:

- Schools and educational settings.
- Local Authorities.
- Social Care.
- Police.
- Health professionals.
- SEND services.
- Alternative Provision providers.

- Youth justice and early help services.

Information may be shared with partner agencies where it is necessary to:

- Safeguard children.
- Promote welfare.
- Support SEND provision.
- Manage risk.
- Facilitate educational provision.
- Meet statutory duties.

Such information sharing will be proportionate, relevant, accurate and recorded appropriately.

Equality, Inclusion and SEND

Winchmore Tutors recognises its responsibilities under the Equality Act 2010 and SEND Code of Practice.

When processing personal information or sharing information about children and young people, particular consideration will be given to:

- Special Educational Needs and Disabilities.
- Neurodiversity.
- Communication needs.
- Social, emotional and mental health needs.
- Disability-related requirements.
- Reasonable adjustments.

Information sharing decisions must promote inclusion and support positive outcomes for all learners.

Use of Devices

Winchmore Tutors recognises the importance of securing personal and sensitive information.

Where staff access or store organisational information electronically:

- Organisation-issued devices should be used wherever possible.
- Personal devices must only be used where authorised.
- Devices must be password protected.
- Multi-factor authentication should be used where available.
- Devices must not be left unattended or accessible to unauthorised persons.
- Safeguarding or special category data must not be stored on unsecured personal devices.
- Public Wi-Fi networks must not be used to access confidential information unless secure VPN protection is in place.

Any loss, theft or compromise of a device containing personal information must be reported immediately to the Data Controller and DSL where relevant.

Record Keeping and Secure Storage

Winchmore Tutors maintains accurate and secure records relating to:

- Learners.
- Safeguarding concerns.
- Staff recruitment and employment.
- SEND support.
- Risk assessments.
- Attendance and engagement.
- Behaviour and welfare.

Records will be:

- Kept securely.
- Protected from unauthorised access.
- Stored in accordance with retention schedules.
- Reviewed regularly for accuracy.
- Archived or destroyed securely when no longer required.

Safeguarding Records

Safeguarding records will:

- Be stored separately from general pupil records where appropriate.
- Be accessible only to authorised safeguarding personnel.
- Be reviewed regularly by the DSL.
- Include concerns, referrals, decisions, actions taken and outcomes.
- Be transferred securely when a learner moves to another setting where appropriate.

The DSL will monitor safeguarding records to identify patterns, recurring concerns and emerging risks.

SEND Records

SEND Information Management

Information relating to SEND will be:

- Managed confidentially.
- Shared only with professionals who require it.
- Used to inform planning, support and reasonable adjustments.
- Regularly reviewed to ensure information is current and accurate.

Staff Records

Staff Information

Staff records, including:

- DBS information.
- References.
- Training records.
- Recruitment documentation.
- Safeguarding training certifications.

will be stored securely and accessed only by authorised personnel who require the information for legitimate business or safeguarding purposes.

The full Data Protection Policy can be found at <http://winchmoretutors.com/policies>

Issue Date: July 2026

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Review Date: July 2027

Signed:



Craig Varney : Winchmore Tutors - Director