

Data Protection and Information Management Policy

Wealth of Knowledge Tuition | Dr Eleanor Hockley, Sole Trader

Effective date	14 October 2026
Review date	October 2027 or sooner following a significant incident or change in guidance
Applies to	All learners and families receiving tuition, Alternative Provision and EOTAS-related services

1. Our commitment

Wealth of Knowledge Tuition treats information about learners and their families as confidential. I collect only what is needed to deliver safe, effective tuition, meet safeguarding responsibilities and manage the business. I handle information in line with UK GDPR, the Data Protection Act 2018 and applicable data protection law, including relevant changes under the Data (Use and Access) Act 2025.

2. Who is responsible?

Dr Eleanor Hockley is responsible for data protection and information management. For privately arranged tuition, I will usually act as data controller. For some Local Authority-commissioned services I may act as a processor under the authority's written instructions; responsibilities depend on the actual agreement and purpose of processing. Where I decide independently how or why information is used, I may be a controller for that activity.

3. What information do I keep?

Only information reasonably needed for tuition, safeguarding, administration and contractual reporting, such as:

- Learner and parent/carer names, contact details and emergency contacts.
- Relevant learning, communication, accessibility, medical and SEND information, including EHCP details where necessary.
- Assessments, lesson notes, attendance, progress reports and relevant professional correspondence.
- Safeguarding records where required, kept with restricted access.
- Invoices, payments, contracts and essential business records.

4. How is information used?

Information is used to plan and deliver tuition, adapt teaching, monitor progress, communicate with families and professionals, meet safeguarding duties, and fulfil contracts and legal obligations. The lawful basis will depend on the activity and whether I am acting as controller or processor. Additional conditions apply when handling health, disability and other special-category information. I do not use learner information for unrelated marketing.

5. How is information kept safe?

Paper records are kept securely and not left accessible to others. Electronic records are held in access-controlled systems, with appropriate device protection, passwords and account security. I limit access to those who need the information, use secure methods when sharing sensitive documents and take care when working remotely. Lost devices, misdirected messages and suspected unauthorised access are treated as potential data incidents.

6. Who can information be shared with?

Information is shared only where there is an appropriate reason and legal basis, including with agreed parents/carers, commissioning Local Authorities, schools, therapists or other professionals involved in provision.

Where consent is the basis for optional sharing, it can be withdrawn. Confidential information may also be shared without consent where necessary for safeguarding, legal duties or protection from serious harm. I explain relevant sharing arrangements to families wherever appropriate and lawful.

7. How long is information kept?

Information is kept only for as long as necessary. Routine tuition information will normally be reviewed for deletion two months after tuition ends, unless safeguarding, legal, contractual or other retention requirements mean it must be kept longer. Financial records, safeguarding records and records relating to Local Authority contracts may have different retention periods. Records are securely deleted or destroyed when no longer required. The applicable retention schedule and contract terms take precedence over a general two-month rule.

8. Your rights

Where I act as controller, individuals can ask about the information held, request access or correction, and exercise other applicable data protection rights. Rights are subject to legal exceptions and may differ where I act solely on a commissioning authority's instructions. I will respond or refer requests to the appropriate controller promptly and within applicable statutory timescales.

9. Concerns, complaints and breaches

Please raise privacy concerns directly with Dr Hockley using the contact details provided in your tuition agreement. I will acknowledge and investigate data protection complaints, keep the complainant informed and explain the outcome. Individuals may also complain to the Information Commissioner's Office (ICO). Suspected data breaches will be recorded, contained and assessed promptly; relevant controllers, the ICO and affected individuals will be notified where required by law or contract.

10. Photographs, online learning and AI

Photographs or recordings of learners will not be used for publicity without appropriate permission. Online sessions and digital resources must be handled securely. Identifiable learner information, EHCPs or safeguarding records will not be entered into public AI tools without a lawful basis, appropriate safeguards and any required commissioner authorisation.

11. Review and related procedures

This policy is reviewed annually and after significant legal, contractual or operational changes. It operates alongside the Safeguarding Policy, Complaints Procedure, Business Continuity Plan, relevant privacy information, data retention records and any Local Authority data processing or sharing agreement.

Policy owner: Dr Eleanor Hockley, Wealth of Knowledge Tuition

Approved / signed: 

Date: 14/10/26_____