

STEFFI HESKETH TUTORING

Privacy Notice

Public website policy

Purpose

This notice explains how Steffi Hesketh Tutoring collects, uses, shares, stores and protects personal information about students, parents, tutors, applicants and website users.

Document control	Details
Policy owner	Steffi Hesketh, Founder
Applies to	Parents, carers, students, tutors, applicants and website users as relevant
Approved	21 July 2026
Version	1.0
Next scheduled review	21 July 2027
Status	Approved and operational - public website version

Important

Steffi Hesketh Tutoring is registered with the Information Commissioner's Office as a data controller and pays the data protection fee. The ICO registration number is not required to exercise any of the rights explained in this notice.

steffiheskethtutoring@gmail.com | 07802 828910 | www.steffiheskethtutoring.co.uk

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This notice should be read alongside our Cookies Policy, Online Tuition and Recording Policy, Safeguarding Policy and Parent Terms and Conditions.

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1. Who we are and how to contact us

Steffi Hesketh, trading as Steffi Hesketh Tutoring, is the data controller for the personal information described in this notice unless another organisation is clearly identified as the controller for its own service.

Contact	Details
Data controller	Steffi Hesketh trading as Steffi Hesketh Tutoring
Email and data-rights requests	steffiheskethtutoring@gmail.com
Telephone / WhatsApp	07802 828910
Website	www.steffiheskethtutoring.co.uk
Location	Southampton, Hampshire, United Kingdom
ICO status	Registered data controller; data protection fee paid

The full service address is included on booking confirmations and invoices and is available on request. Data protection queries and complaints can be made electronically using the email address above.

2. Who this notice covers

- Parents, carers, guardians and adult students who enquire, book or pay for services.
- Children and young people who receive trials, one-to-one tuition, group tuition, masterclasses or resources.
- Tutors, prospective tutors, referees, contractors and other people who work with the business.
- Visitors to the website, people who complete forms, book through Calendly, join mailing lists or contact us through email, telephone, WhatsApp or social media.
- People involved in a complaint, safeguarding concern, payment dispute or other enquiry.

3. Personal information we collect

Category	Examples
Identity and contact	Names, pronouns, parent relationship, address where needed, email, telephone number, usernames and emergency contact details.
Student and education	Age, date of birth where needed, year group, school or home-education status, subjects, exam board, grades, targets, attendance, work, progress, feedback and learning preferences.
SEND, health and accessibility	Information voluntarily shared about disability, neurodiversity, medical needs, anxiety, communication needs, access arrangements and reasonable adjustments.
Lesson and platform information	Lesson dates, participation, messages, chat, shared documents, recordings, transcripts or lesson logs, homework and technical information.
Safeguarding	Concerns, disclosures, incident records, referrals, actions, allegations and information necessary to protect a child or another person.
Bookings and finance	Services booked, prices, payment status, invoices, Stripe references, refunds and accounting records. We do not normally receive full card details from Stripe.
Website and marketing	Contact-form entries, cookie choices, IP address or device information where collected, analytics, enquiry source, mailing preferences and engagement.
Tutor and applicant	CV, employment history, qualifications, QTS or professional status, identity, right to work, DBS check information, references, availability, interview notes, insurance and payment details.
Complaints and correspondence	Emails, messages, call notes, evidence, investigation records and outcomes.

We aim to collect only information that is relevant and proportionate. Parents should not send detailed medical reports, identification documents or safeguarding information through ordinary messaging unless asked to use an approved secure method.

4. Where information comes from

- Directly from a parent, student, tutor, applicant or referee.
- From website forms, Calendly, Stripe, email, WhatsApp, social media, Google Workspace, Google Classroom, Zoom, Microsoft Teams, Google Meet or other approved platforms used for the service.
- From a school, exam centre, professional or local authority where the parent has authorised this or where sharing is lawfully necessary for safeguarding.
- From publicly available professional sources used for proportionate tutor vetting, such as qualification registers or professional profiles.
- From the tutor through attendance, progress, payment and safeguarding records.

5. Why we use information and our lawful bases

We identify a lawful basis for each use. More than one lawful basis may apply where the purposes are genuinely different.

Purpose	Main lawful basis under UK GDPR	Additional condition where relevant
Respond to enquiries, assess needs, match a tutor and arrange trials	Steps at the request of the parent before a contract; legitimate interests in running the service	Not usually applicable
Provide tuition, groups, resources, administration and customer support	Contract; legitimate interests	Explicit consent or safeguarding condition if special category information is necessary
Take payments, issue invoices, manage refunds and keep tax records	Contract; legal obligation; legitimate interests	Not usually applicable
Safeguard children, record concerns and share urgent information	Legal obligation, vital interests, legitimate interests or recognised legitimate interests as applicable	Substantial public interest - safeguarding of children and individuals at risk under the Data Protection Act 2018
Understand SEND, health or accessibility needs and make adjustments	Contract, legitimate interests and, where appropriate, consent	Explicit consent, safeguarding, or another applicable Article 9 and Data Protection Act condition
Record or log lessons for safeguarding, quality, accessibility or complaint handling	Legitimate interests; contract; consent where it is the appropriate basis	Explicit consent or safeguarding condition if special category information is captured and retained
Recruit, vet, contract with and pay tutors	Steps before contract; contract; legal obligation; legitimate interests	Employment/social protection or substantial public interest conditions where applicable; criminal-offence processing condition for DBS information
Handle complaints, disputes, insurance and legal claims	Contract, legal obligation and legitimate interests	Legal claims or safeguarding condition where applicable
Send service updates and permitted marketing	Contract and legitimate interests for service messages; consent or lawful customer soft opt-in for marketing	Not usually applicable
Operate and improve the website	Legitimate interests for security and essential functions; consent or a lawful exemption for other storage/access technologies	Not usually applicable

Safeguarding comes first

Data protection law does not prevent necessary and proportionate information sharing to protect a child. We may share without consent where seeking consent would place someone at risk, prejudice an investigation or is otherwise inappropriate.

6. Children and young people

- Children merit specific protection. We consider their best interests when deciding how to use their information.
- Our website is designed mainly for parents and carers to make enquiries and purchases. A child should not submit payment information or enter a contract independently unless legally able and expressly agreed.

- Parents usually provide information and exercise rights for a child, but a child who is sufficiently mature may exercise their own data protection rights. We consider competence, age, understanding and the nature of the request.
- Privacy information is explained in clear language. The child-friendly summary at the end of this notice can be shared directly with students.
- We do not target children with behavioural advertising or sell their information.

7. Lesson recordings, chat and learning platforms

- A lesson may be recorded, transcribed or documented in a written lesson log for safeguarding, quality assurance, accessibility, revision, absence support or complaint handling.
- Parents are informed of the recording arrangements and the student is told when a session is being recorded. A reasonable opt-out or alternative, such as a written lesson log, is available unless recording is essential for a specific agreed service.
- Camera use is optional. A student may participate using audio, chat or shared work where appropriate.
- Recordings are not used for public marketing or tutor promotion without separate, specific and freely given permission.
- Group recordings may include names, voices, chat or on-screen work. Participants must not download, reproduce or share a group recording unless expressly permitted.
- Platform providers process some information under their own privacy terms. We select reputable providers, restrict access and configure settings proportionately.

8. Who information is shared with

Information is shared only where necessary, proportionate and lawful. Recipients may include:

- The tutor matched to the student and authorised business administrators.
- Website and cloud providers, currently including Wix for the website and providers used for email, documents and secure storage.
- Calendly for appointment booking, Stripe for payments, and the selected lesson or communication platform, which may include Google Workspace, Google Classroom, Google Meet, Zoom, Microsoft Teams or WhatsApp/Meta.
- Accountants, insurers, legal advisers and IT or security providers who owe confidentiality or data-protection duties.
- DBS umbrella bodies, qualification-verification services, referees and professional bodies for tutor vetting.
- Schools, exam centres or other professionals where the parent has requested coordination and sharing is appropriate.
- Local authority children's services, the LADO, police, Prevent partners, regulators, courts, the ICO or another authority where required or necessary to safeguard someone or comply with law.
- A successor business if the service is sold or reorganised, subject to lawful safeguards and notice where required.

We do not sell personal information.

9. International transfers

Some technology providers operate internationally or store information outside the United Kingdom. Where UK personal information is transferred internationally, we use an applicable UK adequacy regulation, the UK International Data Transfer Agreement or Addendum, contractual safeguards, or another lawful transfer mechanism. Parents may ask for further information about the safeguards relevant to a particular provider.

10. How long information is kept

We keep information for no longer than necessary, taking account of the purpose, safeguarding, tax, insurance, limitation periods and any ongoing complaint or legal hold.

Record type	Normal retention approach
Enquiries that do not proceed	Up to 12 months after the last meaningful contact, unless the person asks us to delete it sooner and no lawful reason requires retention.
Client contracts, booking and core payment records	Normally 6 years after the arrangement ends, to manage tax, accounts, complaints and legal claims.
Student lesson notes, attendance and progress records	Normally for the active arrangement and up to 2 years afterwards, unless needed for a complaint, safeguarding matter or agreed ongoing service.
Routine lesson recordings	Normally up to 90 days after the lesson. A recording may be kept longer where needed for a complaint, safeguarding concern, legal claim or agreed course access.

Record type	Normal retention approach
Safeguarding and child-protection records	Significant records are normally retained until the child reaches age 25, or for 10 years after the case was received where longer, with longer retention where required for serious sexual-abuse records, litigation, inquiry or local guidance.
Complaints and disputes	Normally 6 years after closure, with longer retention if a claim, regulator or safeguarding issue remains active.
Tutor contract and vetting record	For the engagement and normally 6 years afterwards. A copy of a DBS certificate is not normally retained for longer than 6 months, although a record of the check and decision may be kept.
Unsuccessful tutor applications	Normally 6 months after the recruitment decision unless the applicant consents to a longer talent-pool period.
Marketing records	Until consent is withdrawn or the person opts out. Minimal suppression information may be retained to respect the opt-out.
Cookie and consent records	For the period shown in the cookie settings or as needed to record preferences and demonstrate compliance.

These are standard periods, not automatic minimums. Information may be deleted sooner where it is no longer needed or kept longer where a documented lawful reason applies.

11. Security and data breaches

- Access is limited to people who need the information for their role.
- Passwords, access controls, secure cloud services, device security, confidentiality requirements and appropriate sharing methods are used.
- Safeguarding and special category information is handled with additional care and should not be placed in ordinary lesson chats or public AI tools.
- Suspected personal-data breaches are assessed, contained and documented. The ICO and affected people are notified where the legal threshold is met.
- No system can be guaranteed completely secure. Parents and tutors should report misdirected messages, lost devices, unauthorised access or accidental sharing immediately.

12. Your data protection rights

Depending on the circumstances, a person may have the right to:

- Be informed about how information is used.
- Ask for access to personal information and receive a copy.
- Ask for inaccurate or incomplete information to be corrected.
- Ask for information to be erased where there is no overriding lawful reason to keep it.
- Ask us to restrict use of information in certain circumstances.
- Object to processing based on legitimate interests or to direct marketing.
- Receive certain information in a portable format where the right applies.
- Withdraw consent at any time where consent is the lawful basis, without affecting earlier lawful use.
- Ask for human review and safeguards if a significant decision is made solely by automated processing. We do not currently make such decisions about students or tutors.

Requests should be sent to steffiheskethtutoring@gmail.com. We may ask for proportionate identification and clarification. We normally respond within one month, subject to lawful extensions or exemptions.

13. Data protection complaints

How to complain

Email steffiheskethtutoring@gmail.com with the subject line "Data Protection Complaint" or use the website contact form and state that the message is a data protection complaint.

- We provide an electronic route for data protection complaints and will not require a person to use a postal process.
- We will acknowledge a data protection complaint as soon as reasonably practicable and no later than 30 days after receiving it.

- We will investigate appropriately, keep the person informed if more time or information is needed, and communicate the outcome without undue delay.
- The outcome will explain the action taken or why no further action is proposed and will signpost the right to complain to the Information Commissioner's Office.
- A person may complain to the ICO. The ICO normally expects the organisation to have had an opportunity to resolve the concern first.

14. Marketing

- Service messages about a booking, payment, safeguarding, timetable or policy are not marketing and may be sent where necessary to perform the service.
- Promotional email or text marketing is sent only where consent has been given or where the customer soft opt-in is lawfully available and an easy opt-out was offered.
- Every electronic marketing message includes a clear way to unsubscribe. Opting out of marketing does not stop essential service communication.
- Children are not directly targeted with marketing based on profiling.

15. Automated decision-making and AI-assisted tools

- We do not use solely automated processing to make decisions that have a legal or similarly significant effect on a student, parent or tutor.
- Software or AI-assisted tools may be used to help draft generic resources, organise information or support administration, but a person reviews the output and remains responsible for decisions.
- Safeguarding records, detailed medical information, identification documents and confidential student information must not be entered into open or public AI tools.
- We apply data protection by design and consider children's needs when introducing new technology.

16. Changes to this notice

We may update this notice when law, guidance, technology or the service changes. The current version and approval date will be published on the website. Material changes will be communicated where appropriate.

17. Child-friendly summary

Your information and your lessons

We use information about you so we can choose the right tutor, teach you, help you access lessons and keep you safe. We only ask for information we need. We may share it with your parent, your tutor and people who help us run lessons safely. We do not sell it.

- You can ask what information we have about you.
- You can tell us if something is wrong or needs changing.
- You can ask why we need a recording or piece of information.
- You can normally keep your camera off and use audio or chat instead.
- Tell your parent, tutor or Steffi if you are worried about privacy or safety.
- You or your parent can email steffiheskethtutoring@gmail.com.

Contact Steffi Hesketh Tutoring

Email: steffiheskethtutoring@gmail.com

Phone / WhatsApp: 07802 828910

Website: www.steffiheskethtutoring.co.uk

Based in: Southampton, Hampshire, United Kingdom

Legal and guidance framework

This notice reflects the UK GDPR, Data Protection Act 2018, Data (Use and Access) Act 2025, Privacy and Electronic Communications Regulations, relevant Information Commissioner's Office guidance on children, complaints, retention and privacy by design, and Department for Education guidance on safeguarding records. It is reviewed at least annually and sooner when law, guidance, systems or business arrangements change.