

Privacy Policy

Primary Steps Tutoring

Last updated: 1 July 2026

1. Introduction

Primary Steps Tutoring (“we”, “our”, “us”) is committed to safeguarding the privacy and security of personal data in accordance with the UK General Data Protection Regulation (GDPR) and other applicable data protection laws.

This Privacy Policy explains how we collect, use, store, and protect personal information relating to our tuition services, website use, and communications.

If you have any questions about this policy or how we handle your data, please contact:

Data Controller: Karen Waller

Address: 47 Drake Avenue, Torquay, TQ2 6JL

Email: info@primarystepstutoring.co.uk

2. Legal Basis for Processing

We process personal data on one or more of the following legal bases:

- **Performance of a contract** – to provide tuition or related services you have requested.
 - **Legitimate interests** – for administrative, operational, and service improvement purposes.
 - **Legal obligations** – to comply with safeguarding, record-keeping, and reporting requirements.
 - **Consent** – for optional communications or activities (e.g. marketing emails or session recordings), which you can withdraw at any time.
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3. Information We Collect

We may collect the following types of personal data:

From parents, students, and clients:

- Contact details (name, address, phone number, email).

- Student details (name, age, school year, academic performance, learning needs).
- Session information (attendance, progress notes, reports).
- Payment and invoicing details (where applicable).

From tutors:

- Qualifications, experience, DBS checks, references, and feedback.

From website users:

- IP address, browser type, operating system, referring site, and browsing activity (automatically collected).
- Voluntary information submitted via website forms, such as contact details or enquiry information.

4. How We Use Your Information

We process personal data to:

- Provide and manage tuition services.
- Communicate about lessons, scheduling, feedback, and progress.
- Assess suitability for grammar school preparation or other tuition programmes.
- Comply with safeguarding, legal, and regulatory obligations.
- Improve our services and tailor support to individual needs.
- Send relevant updates or marketing information (only with your explicit consent).
- Analyse website usage to improve content and user experience.

We do **not** sell or rent your personal data to third parties for marketing purposes.

5. Sharing of Information

We may share data with:

- **Tutors** engaged or subcontracted to deliver tuition.
- **Parents/guardians** to provide updates, progress reports, and feedback.
- **Schools or local authorities** (with written consent or where part of a contracted service).
- **Service providers** who assist in operations (e.g. IT support, payment processing).
- **Regulatory or safeguarding authorities** when required by law.

All third-party partners are required to handle personal data securely and only for legitimate purposes.

6. Session Recordings

For quality assurance, safeguarding, and training purposes, **Primary Steps Tutoring** may record online or in-person tuition sessions using a secure webcam system.

Recordings are used for the following purposes:

- To ensure the safety and wellbeing of students and tutors.
- To monitor teaching quality and provide reflective feedback.
- To address any safeguarding, complaint, or incident reviews if required.

All recordings are stored securely and are **not shared with any third parties** unless required by safeguarding or legal authorities.

Recordings are retained for a **limited period (typically up to 6 months)**, unless a longer retention is necessary for safeguarding or legal purposes.

Access to recordings is strictly limited to **Karen Waller** and, where applicable, authorised safeguarding or regulatory bodies.

Consent for session recording is obtained from parents/guardians prior to any recording, and consent can be withdrawn at any time by contacting info@primarystepstutoring.co.uk.

7. Cookies and Website Data

Our website uses cookies to help us understand how visitors use the site and to improve your experience.

- Cookies collect anonymous traffic data (e.g. pages visited, time on site).
 - You can choose to accept or decline cookies via your browser settings.
 - We use Google Analytics; you can read Google's privacy policy here: <https://www.google.com/privacypolicy.html>.
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8. Data Retention

We retain personal data only as long as necessary to fulfil the purposes for which it was collected, including legal and accounting requirements.

- Tuition-related data is usually kept for up to **six years** after the end of service.
 - Marketing data is retained until you unsubscribe or request deletion.
 - Session recordings are retained for up to **six months**, unless required longer for safeguarding purposes.
 - Sensitive data relating to children or vulnerable adults is subject to additional reviews and restricted access.
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9. Data Security

We take data security seriously and implement suitable physical, electronic, and organisational safeguards, including:

- Secure passwords and two-factor authentication.
- Encryption of sensitive files.
- Restricted access to authorised personnel only.
- Regular reviews of data storage and protection measures.

While we strive to use all reasonable means to protect your information, transmission over the internet can never be guaranteed to be completely secure.

10. Data Subject Rights

Under GDPR, you have the right to:

- **Access** your personal data.
- **Rectify** inaccurate or incomplete information.
- **Request erasure** of your personal data (subject to legal retention requirements).
- **Restrict processing** in certain circumstances.
- **Data portability** – request a copy of your data in a machine-readable format.
- **Object** to certain processing, including direct marketing.
- **Withdraw consent** at any time for data processed on that basis.

To exercise any of these rights, contact info@primarystepstutoring.co.uk.

11. Data Breach Procedure

In the event of a data breach, we will:

- Take immediate action to mitigate the impact.
 - Assess what data was affected and inform impacted individuals, where appropriate.
 - Report the breach to the Information Commissioner's Office (ICO) within 72 hours if required.
 - Take corrective steps to prevent recurrence.
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12. Links to Other Websites

Our website may contain links to other websites. We are not responsible for the privacy practices or content of these external sites. Please review the privacy policies of any third-party websites you visit.

13. Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in legal, technical, or business developments. Updates will be posted on our website with the revised “Last updated” date.

14. Contact Us

If you have any questions or wish to exercise your data rights, please contact:

Karen Waller

Primary Steps Tutoring

47 Drake Avenue

Torquay, TQ2 6JL

 info@primarystepstutoring.co.uk