

# DATA PROTECTION POLICY

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2026

Quality in Tutoring Ltd  
LONDON – BIRMINGHAM - MANCHESTER  
[www.qualitytutoring.org.uk](http://www.qualitytutoring.org.uk)

Quality In Tutoring Ltd is a registered company in England and Wales (Company No. 10050813) with a registered address at 128 City Road, London, EC1V 2NX. We are an approved Crown Commercial Service (CCS) supplier and a UK registered learning provider (UKPRN).

# Data Protection Policy

**Effective Date:** April 2026

**Review Date:** April 2027

**Approved By:** Mirvat Al-Khulaqi

## 1. Purpose

This Data Protection Policy outlines how Quality in Tutoring Ltd (the “Company”) collects, processes, stores, and protects personal data in compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This policy ensures that all personal data is managed responsibly and used for legitimate purposes in alignment with the rights and expectations of students, parents, employees, and other stakeholders.

Quality in Tutoring Ltd is registered with the Information Commissioner’s Office (ICO), registration number: ZB407748, demonstrating our commitment to maintaining high standards of data protection and privacy compliance.

## 2. Scope

This policy applies to all employees, contractors, and agents of Quality in Tutoring Ltd who handle or process personal data. It covers all data relating to students, parents, staff, and other third parties that the Company interacts with in providing its services.

## 3. Key Definitions

- **Personal Data:** Any information that relates to an identified or identifiable individual.
- **Data Controller:** Quality in Tutoring Ltd, responsible for determining how and why personal data is processed.
- **Data Processor:** Any individual or third party that processes personal data on behalf of the Company.
- **Data Protection Officer (DPO):** The designated person responsible for overseeing data protection and ensuring compliance.

#### 4. Data Protection Principles

Quality in Tutoring Ltd is committed to processing personal data in accordance with the following principles:

- Personal data shall be processed lawfully, fairly, and in a transparent manner.
- Data is collected for specified, explicit, and legitimate purposes and not further processed in an incompatible manner.
- Only relevant and necessary data is collected.
- Personal data shall be accurate and kept up-to-date.
- Data is retained only as long as necessary for its purpose.
- Appropriate security measures are in place to protect data from unauthorised access, loss, or damage.
- The Company is responsible for demonstrating compliance with data protection principles.

#### 5. Data Collection and Usage

The Company collects and uses personal data only as required for the legitimate provision of tutoring services. This may include:

- **Student Information:** Name, age, contact details, academic records, learning progress, special educational needs.
- **Parent/Guardian Information:** Name, contact details, and communication preferences.
- **Staff Information:** Contact details, qualifications, DBS checks, training records, payment order data.
- **Third-Party Providers:** Contact details and agreements related to services provided to the Company.

#### 6. Legal Basis for Processing

The Company ensures that processing of personal data is based on one or more of the following legal bases:

- **Consent:** Obtained from students or parents/carers where applicable.
- **Contractual Necessity:** Required to deliver tutoring services.
- **Legal Obligation:** Compliance with a legal requirement (e.g., safeguarding regulations).

## **7. Data Security**

Quality in Tutoring Ltd employs strict security measures to protect personal data, including:

- Data access is limited to authorised personnel only.
- Sensitive information is encrypted during transmission and storage.
- Physical and digital records are stored securely, with regular backups. Quality in Tutoring has now moved to digital record keeping.
- Security measures are regularly reviewed and updated.

## **Use of Secure Systems (TutorCruncher)**

Quality in Tutoring Ltd uses TutorCruncher as its primary secure data management system for lesson scheduling, attendance tracking, safeguarding reporting, and client communication. Access to TutorCruncher is restricted to authorised personnel only and is controlled secure login credentials and role-based permissions.

All lesson reports, attendance records, and safeguarding concerns must be recorded directly on TutorCruncher to ensure a secure, auditable record. The system is monitored regularly, and data is stored in accordance with UK GDPR requirements. Staff are strictly prohibited from storing sensitive student information on personal devices or external platforms outside of approved systems.

## **8. Data Retention and Disposal**

Personal data is retained only as long as necessary for the purpose for which it was collected. Upon conclusion of the data's retention period, data will be securely disposed of through secure deletion or shredding.

## **9. Individual Rights**

Individuals have the following rights regarding their personal data:

- Request access to their personal data held by the Company.
- Request correction of inaccurate or incomplete data.
- Request deletion of personal data where it is no longer needed or where processing is unlawful.

- Limit processing under certain conditions.
- Obtain and reuse their data across different services.
- Object to data processing based on legitimate interests.
- Request human intervention where automated decision-making is used.

Requests related to these rights can be directed to the Data Protection Officer at

**Data Protection Officer:** Ms Mirvat Al-Khulaqi

**Email:** [Mirvat.alkhulaqi@qualitytutoing.org.uk](mailto:Mirvat.alkhulaqi@qualitytutoing.org.uk)

**Phone:** 07440545612

## **10. Data Breach Notification**

In the event of a data breach, the Company will assess the impact and notify affected individuals and the Information Commissioner's Office (ICO) where required. Measures will be taken to contain and address the breach, and a review will be conducted to prevent future incidents.

## **11. Data Protection Training**

All staff members handling personal data receive training on data protection, privacy policies, and best practices to ensure they understand and fulfil their responsibilities under this policy.

## **12. Third-Party Processors**

The Company uses third-party providers for specific services (e.g., payment processing, secure storage), ensuring these providers comply with data protection regulations and maintain appropriate security standards.

## **13. Policy Review**

This Data Protection Policy will be reviewed annually or as needed to reflect changes in legislation, data processing activities, or organisational structure.

## **14. Contact Information**

For any queries or concerns related to data protection, or to exercise any of the rights mentioned, please contact:

**Data Protection Officer:** Ms Mirvat Al-Khulaqi

**Email:** [Mirvat.alkhulaqi@qualitytutoing.org.uk](mailto:Mirvat.alkhulaqi@qualitytutoing.org.uk)

**Phone:** 07440545612

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### **Acknowledgement**

By working with Quality in Tutoring Ltd, all staff members agree to adhere to this Data Protection Policy and to handle personal data in compliance with all relevant data protection laws and regulations.