



GDPR and Data Protection Policy

1. Introduction

This Data Protection Policy outlines how Lighthouse Tuition South-West ("the Company") ensures compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and relevant aspects of IR35 legislation. It governs the collection, processing, storage, and disposal of personal data belonging to clients, tutors, and other stakeholders in the delivery of tuition services.

2. Scope

This policy applies to:

- All directors, employees, contractors, and sub-contracted tutors working with or on behalf of Lighthouse Tuition South-West.
- All personal data processed by the Company in relation to tuition services.

3. Data Protection Principles

Lighthouse Tuition South-West complies with the following UK GDPR principles:

- Lawfulness, Fairness, and Transparency: Data is processed lawfully, fairly, and transparently.
- Purpose Limitation: Data is collected for clear, specified, and legitimate purposes.
- Data Minimisation: Only data that is strictly necessary is collected and processed.
- Accuracy: Personal data is accurate and kept up to date.
- Storage Limitation: Data is retained only as long as necessary for the purposes collected.
- Integrity and Confidentiality: Personal data is processed securely to prevent unauthorised or unlawful processing, accidental loss, destruction, or damage.
- Accountability: Lighthouse Tuition South-West takes responsibility for demonstrating compliance with these principles.

4. Lawful Bases for Processing

Lighthouse Tuition South-West processes personal data on the basis of one or more of the following:

- Consent: Where required, informed and explicit consent is obtained.
- Contractual Obligation: For fulfilment of service agreements with families and tutors.
- Legal Obligation: Compliance with applicable laws and safeguarding duties.
- Legitimate Interests: When processing is necessary for the Company's operations and does not override individual rights.
- Vital Interests: In situations involving health and safety or safeguarding concerns.

5. Roles and Responsibilities

- Lighthouse Tuition South-West is the Data Controller responsible for determining how and why personal data is processed.
- Tutors are expected to act as independent Data Processors where applicable, particularly under the IR35 framework, ensuring their own compliance with data protection obligations.
- All personnel must complete regular training and adhere to this policy in full.





6. Data Security

Lighthouse Tuition South-West implements the following to ensure data is secure:

- Secure encrypted storage systems for electronic records.
- Password-protected devices and systems.
- Restricted access to data based on role.
- Physical security measures for paper records.

Tutors must store any client information securely and ensure all data is deleted or returned to the Company upon completion of their service or termination of agreement.

7. Data Sharing and Sub-Processing

Personal data is only shared:

- With authorised personnel or tutors under contract with Lighthouse Tuition South-West.
- When legally required (e.g., safeguarding or legal investigations).
- With third-party service providers under a strict data processing agreement.

No data is transferred outside the UK without adequate protection in place.

8. Data Retention

Lighthouse Tuition South-West retains data only for as long as necessary. Retention periods include:

- Client and tutor records: 6 years after end of service for audit and safeguarding purposes.
- Safeguarding records: In line with statutory guidance.
- Financial records: As required by HMRC (minimum 6 years).

9. Rights of Data Subjects

Individuals have the right to:

- Be informed of how their data is used.
- Access their personal data.
- Rectify inaccuracies.
- Erase their data (“right to be forgotten”) where appropriate.
- Restrict or object to processing.
- Data portability.
- Lodge complaints with the Information Commissioner's Office (ICO).

10. IR35 and Data Protection

Under IR35 guidelines, tutors providing services through their own intermediary are responsible for their own data compliance. However:

- Tutors must follow all data handling procedures outlined in the Lighthouse Tuition South-West Service Level Agreement and IR35 Guidelines Agreement.
- Where tutors process client data, they do so as independent Data Processors under the instruction of Lighthouse Tuition South-West and must not use data for any other purpose.





11. Breach Reporting

All data breaches—whether accidental or deliberate—must be reported immediately to the Company Director. Where necessary, Lighthouse Tuition South-West will notify the Information Commissioner’s Office (ICO) within 72 hours, and affected individuals where required.

12. Policy Review

This policy is reviewed annually or when legislation changes. All staff and tutors will be notified of updates and are required to acknowledge receipt and understanding.

Name of Tutor: _____

Signed by Tutor: _____

Date: _____

Signed on behalf of Lighthouse Tuition (South-West)

Director Name: _____

Signature: _____

Date: _____

