StepWise Tuition

PRIVACY POLICY

This policy explains how StepWise Tuition collects, uses, shares and protects personal information, in line with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations (PECR).

It covers everyone whose information we handle: parents and guardians, students, tutors, schools and other clients, and visitors to our website and social media pages. We provide online and in-person tuition, and we also arrange self-employed tutors for families, schools and other clients.

1. Who We Are

StepWise Tuition is the data controller for the personal information described in this policy. This means we decide how and why it is used.

- **Legal entity:** StepWise Tuition Ltd, a company registered in England and Wales (company number 17065847)
- **ICO registration number:** ZC193740
- **Address:** 167-169 Great Portland Street, 5th Floor, London W1W 5PF
- **Email:** info@stepwisetuition.org
- **Phone:** 07449 183807

For any questions about your information, contact us using these details.

2. Information We Collect

We collect only the information we need to arrange, deliver and improve tuition, and to manage the tutors who work with us.

Who	Information
Parents and guardians	Name, email, phone number, address, payment details, preferred days and times, and messages you send us

Who	Information
Students	Name, age, school year, school, subjects, exam board, academic progress and work, and any special educational needs (SEN) a parent tells us about (see section 5)
Students in online lessons	Video and audio recordings of online lessons (see section 6)
Tutors	Name, contact details, qualifications, teaching experience, right-to-work documents, references, feedback, payment details, and Enhanced DBS check results (see section 5)
Schools and other clients	Names, job titles and contact details of staff we work with
Website and social media visitors	Pages visited, device and browser details, approximate location, and how you reached us, collected through cookies and similar tools (see section 7)

3. Where We Get Your Information

Most information comes directly from you. We also receive it from:

- **Our website and enquiry forms**, including our Wix contact and registration forms
- **Facebook and Instagram lead forms**, when you submit your details in response to one of our ads (provided to us by Meta)
- **Google**, when you contact us after seeing our Google ads or Google Business Profile
- **Parents and guardians**, who give us information about their children
- **Schools and local authorities** that engage us to tutor their students
- **Tutors**, who share notes on lessons and student progress
- **Referees and the Disclosure and Barring Service (DBS)**, for tutor background checks

4. How We Use Information and Our Lawful Bases

The law requires a lawful basis for each use of personal information. Ours are set out below.

What we use it for	Lawful basis
Answering enquiries and arranging tuition or a free first class	Steps at your request before a contract
Delivering online and in-person lessons, scheduling and taking payment	Contract
Tracking progress and sending feedback to parents	Contract
Arranging tutors for clients and managing their assignments	Contract, and legitimate interests in running our tutoring service

What we use it for	Lawful basis
Vetting tutors, including Enhanced DBS checks and references	Legal obligation and legitimate interests in safeguarding children
Recording online lessons	Legitimate interests in safeguarding, quality and letting students rewatch lessons
Recording a student's SEN	Explicit consent of the parent or guardian
Keeping financial, tax and safeguarding records	Legal obligation
Website analytics and advertising cookies	Consent, given through our cookie banner
Marketing emails and texts	Consent, or our legitimate interests for existing customers (see section 8)
Improving our services	Legitimate interests

Where we rely on legitimate interests, we have checked that they do not override your rights. You can ask us for details of that check.

5. Special Educational Needs and DBS Information

Special educational needs (SEN). We ask parents whether their child has any SEN so we can adapt lessons. This can include health or disability information, which the law treats as special category data. We only record it with the parent's or guardian's explicit consent, share it only with the tutor teaching the child, and delete it when tuition ends (see section 11). Parents can withdraw consent at any time.

Criminal records (DBS) information. We require tutors to hold an Enhanced DBS check because they work with children. We process this information under the Data Protection Act 2018 condition for safeguarding children. We record the certificate number, date and outcome, and do not keep copies of certificates for longer than 6 months.

6. Recording of Online Lessons

All online lessons are recorded, including the video, audio and chat. We tell students and parents this before the first lesson. We record lessons to:

- Protect students and tutors (safeguarding)
- Check and improve teaching quality
- Let students rewatch a lesson for revision
- Resolve any complaint or dispute

Recordings are stored securely on TutorCruncher, our lesson and booking platform, and can only be accessed by StepWise Tuition staff and, where needed, the student and their parent or guardian. We keep each recording for 12 months from the date of the lesson, unless it is needed for a safeguarding concern or complaint, in which case we keep it until that matter is

closed. We never use recordings in marketing without separate written consent from the parent or guardian.

In a group class, a recording will include other students. Students can keep their camera off if they prefer.

7. Cookies, Analytics and Advertising

Our website uses cookies and similar tools. Essential cookies run automatically; all others only run if you accept them in our cookie banner. You can change your choice at any time using the privacy settings button in the bottom-left corner of our website.

Tool	Provider	What it does	Type
Wix	Wix.com	Runs the website and keeps it secure	Essential
Usercentrics	Usercentrics GmbH	Shows our cookie banner and remembers your cookie choices	Essential
Google Analytics	Google	Shows how visitors use the site so we can improve it	Analytics (consent)
Google Ads tag	Google	Measures enquiries from our Google ads and shows our ads to past visitors	Advertising (consent)
Meta Pixel	Meta (Facebook, Instagram)	Measures enquiries from our Facebook and Instagram ads and shows our ads to past visitors	Advertising (consent)
Google Reviews widget	Google and the widget provider	Displays our Google reviews	Functional (consent)

Google and Meta may combine this information with what they already hold about you, under their own privacy policies. You can also manage ad preferences in your Google and Meta accounts.

8. Marketing Communications

We only send marketing emails or texts if you have agreed to receive them. If you are already a customer, we may tell you about similar tuition services, such as new classes or holiday courses.

Every marketing message includes a way to opt out, and you can also email info@stepwisetuition.org at any time. Opting out does not affect messages about lessons you have booked. We never send marketing directly to students under 18.

9. Who We Share Information With

We never sell or rent personal information. We share it only where needed:

- **Tutors:** student details needed to teach, including any SEN, with the tutors we arrange for you.
- **Parents and guardians:** progress updates and feedback about their child.
- **Clients:** a tutor's profile, qualifications and experience when we arrange that tutor for them, with the tutor's agreement. We never share one client's details with another client without written consent.
- **Schools and local authorities:** student information, where the school has engaged us or the parent has agreed in writing.
- **Service providers** who act on our instructions: Wix (website and forms), Usercentrics (cookie consent), TutorCruncher (scheduling, invoicing, online lessons and recordings), Google and Meta (advertising and analytics), Stripe (payment processing), and email and IT providers.
- **Authorities:** the police, local authority safeguarding teams or other regulators, where the law requires it or a child may be at risk.

10. International Transfers

Some of our service providers, including Google, Meta, Wix and Stripe, store or process information outside the UK, mainly in the United States and the European Economic Area.

When this happens, the information is protected by a UK adequacy decision (such as the UK–US Data Bridge) or by the UK International Data Transfer Agreement or Addendum. You can ask us for more detail on these safeguards.

11. How Long We Keep Information

We keep information only as long as we need it, then delete it securely.

Information	How long we keep it
Enquiries that do not become bookings, including ad lead forms	12 months after last contact
Student and parent records	Until tuition ends, plus 1 year
SEN information	Deleted when tuition ends
Online lesson recordings	12 months from the date of the lesson, or until a related concern or complaint is closed
Safeguarding records	Until the student's 25th birthday, in line with UK safeguarding guidance
Invoices and payment records	6 years, as HMRC requires
Unsuccessful tutor applications	6 months

Information	How long we keep it
Tutor records	6 years after the tutor stops working with us
DBS certificate number, date and outcome	While the tutor works with us (copies of certificates: no more than 6 months)
Website analytics data	14 months

12. Security and Data Breaches

We protect personal information with secure passwords, two-factor authentication, encryption, and access limited to people who need it. No system is completely secure, but we review our measures regularly.

Information about children, SEN and DBS checks gets extra protection:

- We review where it is stored at least every 3 months.
- Only the people who need it to teach or keep children safe can access it.
- It is used only for the purpose it was collected for, and we control any copies made.

If a data breach happens, we will act straight away to contain it and assess the risk. Where it is likely to put people at risk, we will report it to the Information Commissioner's Office (ICO) within 72 hours. Where the risk to you is high, we will also tell you promptly, in plain language, and explain the steps you can take.

13. Your Rights and How to Complain

You have the right to:

- **Access** a copy of the information we hold about you
- **Correct** information that is wrong or incomplete
- **Delete** your information in certain circumstances
- **Restrict** how we use it in certain circumstances
- **Object** to our use of it, including for marketing
- **Move** information you gave us to another provider (data portability)
- **Withdraw consent** at any time, where we rely on consent

To use any of these rights, email info@stepwisetuition.org. It is free, and we will reply within one month. We may ask you to confirm your identity first.

Children's information. Parents and guardians can usually make requests about their child's information. Students who are old enough to understand their rights, generally from around age 12, can also make requests themselves.

Complaints. If you are unhappy with how we handle your information, please contact us first so we can put it right. You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk/make-a-complaint or on 0303 123 1113.

14. Automated Decisions and Changes

Automated decisions. We do not make decisions about you using only automated means, and we do not profile students.

Changes to this policy. We may update this policy from time to time. The latest version will always be on our website, with the date it was last updated. If we make a significant change, we will tell current customers by email.

15. Contact Us

If you have any questions or concerns about this Privacy Policy or our data practices, or if you wish to exercise your data protection rights, please contact us at:

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