

# Tutor Privacy Notice

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## Introduction

The Tutor Trust take the protection of your personal data very seriously and strictly adhere to the rules laid out by data protection laws and the General Data Protection Regulation (GDPR-UK).

Our details are:

Tutor Trust, Studio 10, 2nd Floor, Little Lever Street, Manchester M1 1HR

Contact number: 0161 833 3055

This privacy notice gives you information on how we collect and process your personal data throughout your time as a data subject at the Tutor Trust and any data you may provide during your time with us.

We have appointed a data protection officer (DPO) who is responsible for monitoring and providing guidance with our GDPR status. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact us using the [contact information](#) of this privacy notice.

## Why we collect your personal information

We collect your personal data for one of the following purposes:

- To manage communications between you and us
- Where we need to perform the contract we have entered into with you
- To provide you with information you have requested
- To assess suitability for a job advertised
- Undertake safeguarding and pre-employment checks (such as Disclosure and Barring Service (DBS) checks)
- To support Tutor Trust's Equality, Diversity & Inclusion programmes
- To ensure Child protection and safeguarding
- To facilitate payments to your account

## Lawful basis of Processing Information

We only collect and use personal information about you when the law allows us to.

Most commonly, we use it where:

- The data subject (you) has given consent to the processing activity taking place
- If the processing is necessary for the performance of a contract
- If the processing is necessary for compliance with a legal obligation to which the controller is subject

- If the processing is necessary for the purpose of the legitimate interest pursued by us or our partners

Where legitimate interest is identified as a lawful basis, we will undertake a legitimate interest assessment which is a three-part test covering:

- **The purpose test** – to identify the legitimate interest
- **Necessity test** – to consider if the processing is necessary for the purpose identified
- **Balancing test** – considering the individual's interests, rights or freedoms and whether these override the legitimate interests identified

The legitimate interest could be for example where we may take photographs of Tutors, to manage communications between you and us or provide you with information you have requested or to assess suitability for a job.

## What Information we collect and where from

The categories of personal information that we may collect, store and use about you include:

- Name, address, telephone number, email
- Date of birth
- Identification documents
- Qualification and skills information
- Previous employment records
- Application forms (including relevant references)
- Bank account details
- Result of DBS/Right to Work/Prohibited Teacher checks
- Information about disciplinary incidents
- Answers to internal surveys
- Absence information
- Photographs/Images
- Tutor observations

## Special Category Data

We may collect the following special category data from you:

- Health data and any associated accessibility needs and reasonable adjustments
- Disability data
- Ethnicity
- Sexual orientation

We will only process special category data where we have an Article 9 exception allowing us to do so (as well as an Article 6 lawful basis). The personal data and special category data processed on the Equality and Diversity Monitoring form is based on your consent and explicit consent and is optional.

Health data is considered special category data (particularly sensitive personal data) and we process this in order to make any reasonable adjustments or fulfil any accessibility requirements for you. The relevant basis in this case is Employment, social security and social protection law under Article 9.

We carry out DBS (Disclosure and Barring Service) and Prohibited Teacher checks for all prospective tutors, for the detection and prevention of crime in line with our safeguarding duties and relevant guidance and legislation.

If successful, we will collect data about you from third parties, such as former employers when gathering references.

Should you be successful in your tutor application, we will gather further information from you, for example, your bank details.

### Third-Party collection of Personal Data

We do not collect personal data from any other source except yourselves, except where seeking references as mentioned above.

### How long we keep information for

We pride ourselves on ensuring that your personal data is only retained for the period that we need it for, or in accordance with laws, regulations and professional obligations that we are subject to. In relation to unsuccessful candidates, this retention period is six months.

All personal information collect has a defined retention period, which is in-line with our retention policy. If you would like to find out how long your information is being retained, please see the [additional information](#) section of this policy.

Please note, access to your personal data is restricted to those that require access, dependent on their role at Tutor Trust.

Answers from the Equality and Diversity Monitoring Form are not retained longer than 6 months should you be unsuccessful. The responses may, however, be used for reporting purposes, in an aggregate and anonymised form.

If your application is successful, your data will be kept and transferred to the systems we administer for tutors. We have a separate privacy notice for tutors, which will be provided to you.

## Security of personal information

We take the responsibility for protecting your privacy very seriously and we will ensure your data is secured in accordance with our obligations under the Data Protection laws. We have in place technical and organisational measures to ensure personal information is secured and to prevent your personal data from being accessed in an unauthorised way, altered or disclosed. We have in place measures to ensure restricted access to your personal data to those employees, contractors and other third parties who only have a business need to know. The processing of your personal data will only take place subject to our instruction.

We have policies and procedures to handle any potential data security breaches and data subjects, third parties and any applicable regulators will be notified where we are legally required to do so.

We have ensured that all employees have had information security and data protection training. If you would like more details of the security we have in place, please see the [additional information](#) section of this policy.

## Your individual rights

In this Section, we have summarised the rights that you have under General Data Protection Regulation. Some of the rights are complex, and not all the details have been included in our summaries. Accordingly, you should read the relevant laws and guidance from the regulatory authorities for a full explanation of these rights.

Your principal rights under General Data Protection Regulation are:

- Right to Object
- Right of Access
- Right to be informed
- Right to Rectification
- Right to Erasure
- Right to Restrict Processing
- Right to Data Portability

### The right to object

You can exercise this right if:

- Processing relies on legitimate interest
- Processing is for scientific or historical research
- Processing includes automated decision making and profiling
- Processing is for direct marketing purposes

## The right of access

- You or any third party acting on your behalf with your authority may request a copy of the personal data we hold about you without charge
- We will ask to verify your identity or request evidence from the third party that they are acting on your behalf before releasing any personal data we hold about you

## The right to be informed

- We are required, to provide clear and transparent information to you about how we process your personal data. This privacy notice addresses this right.

## The right of rectification

- If you believe the personal data we hold about you is incorrect or incomplete you have the right to correct this and you may exercise this right along with the right to restrict processing until these corrections are made

## The right to erasure

- If there is no legal basis or legitimate reason for processing your personal data, you may request that we erase it

## The right to restrict processing

You may ask us to restrict the processing of your personal data. This means we will still hold it but not process it. This is a conditional right which may only be exercised when:

- Processing is unlawful
- We no longer need the personal data, but it is required for a legal process
- You have exercised your right to object to processing and require processing to be halted while a decision on the request to object is made
- If you are exercising your right to rectification

## The right to data portability

You can request that your personal data is transferred to another controller or processor in a machine-readable format if:

- Processing is based on consent
- Processing is by automated means (i.e. not paper based)
- Processing is necessary for the fulfilment of a contractual obligation

If you have any question about these rights, please see the [additional information](#) section of this policy.

## Consent

Where you have given consent for processing, or explicit consent in relation to the processing of special category data, you have the right to withdraw this consent at any time, but this will not affect the lawfulness of processing based on consent before its withdrawal. You can withdraw your consent by emailing [privacy@thetutortrust.org](mailto:privacy@thetutortrust.org)

## Failure to provide Personal Information

Where we need to collect personal data by law or in order to process your instructions or perform a contract we have with you and you fail to provide that data when requested, we may not be able to carry out your instructions or perform the contract we have or are trying to enter into with you. In this case, we may have to cancel our engagement or contract you have with us, but we will notify you if this is the case at the time.

## Cookies

Our website uses cookies. Please see our [cookies policy](#) on our website for full details of the cookies used.

## Automated decision making

Your personal data is not used in any automated decision making (a decision made solely by automated means without any human involvement) or profiling (automated processing of personal data to evaluate certain conditions about an individual).

Where we make an automated decision which has a legal or substantially similar effect, you have the right to speak to us and we may then review the decision, provide a more detailed explanation and assess if the automated decision was made correctly. We will update this section should we use automated decision making or profiling in the future.

## Transfers to Third Parties

The Tutor Trust may disclose your personal data, listed in section 4 to some third parties to help us deliver our services/products. All third parties are contractually bound to protect the personal data we provide to them. We may use several or all of the following categories of recipients:

- Business partners, suppliers, contractors for the performance of any contract we enter into with them or you such as payroll provider, insurance companies, HR platform, bank etc.
- Disclosure and Barring Service (and their umbrella body for checks) for the purposes of criminal record checks
- Third parties that support us to provide products and services e.g. IT support and cloud-based software services

- Professional advisors e.g. lawyers, auditors
- Where necessary, your place of education

## Transfers outside the UK

In this section, we provide information about the circumstances in which your personal data may be transferred and stored in countries outside the UK.

We may share personal information to third parties outside of the UK. Any personal information transferred will only be processed on our instruction and we ensure that information security at the highest standard would be used to protect any personal information as required by the Data Protection laws.

Where personal data is transferred outside of the UK to a country without an adequacy decision, we will ensure appropriate safeguards are in place prior to the transfer. These could include:

- International Data Transfer Agreement or the Addendum
- Binding Corporate Rules
- An exception as defined in Article 49 of the UK GDPR

For more information about transfers and safeguarding measures, please contact us using the information [here](#).

## Right to complaint

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact us via email on [privacy@thetutortrust.org](mailto:privacy@thetutortrust.org) or;

By contacting the Chief Operating Officer (and GDPR Lead)

By Post: Tutor Trust, Studio 10, 2nd Floor, Little Lever Street, Manchester M1 1HR

By Phone: 0161 833 3055

Alternatively, you can make a complaint to the Information Commissioner's Office:

**By Post:** Information Commissioners Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

**By Website:** [Click Here](#)



**By Email:** [Click Here](#)

**By Phone:** 0303 123 1113 (Local rate) or 01625 545 745 (National rate)

## Additional information and Data Protection Officer (DPO)

Your trust is important to us. That is why we are always available to talk with you at any time and answer any questions concerning how your data is processed. If you have any questions that could not be answered by this privacy policy or if you wish to receive more in-depth information about any topic within it, please contact us on [privacy@thetutortrust.org](mailto:privacy@thetutortrust.org)

Our outsourced Data Protection Officers are Bulletproof, and they can be contacted on [dposupport@bulletproof.co.uk](mailto:dposupport@bulletproof.co.uk) or on 01438 500096

## Policy Review and Amendments

We keep this Policy under regular review. This Policy was last updated on 08/07/2025.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.