Westminster Tutors

Parent Privacy Notice

2026-2027

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1. Introduction

1.1 Westminster Tutors Ltd, trading as Westminster Tutors, is the data controller for your personal information. This means that we decide why and how your information is used.

1.2 This notice explains what personal information we collect about you, where it comes from, how and why we use it, who we may share it with, how long we keep it, and your data protection rights.

1.3 Personal information means any information that identifies you or could be used to identify you.

1.4 This notice applies to parents, carers, emergency contacts, clients, and fee-payers of prospective, current, and former students. In this notice, "you" means the person whose information we are using.

1.5 Information about students is covered by the Student Privacy Notice. This notice does not give you any additional right to receive a student's personal information.Please read the following carefully to understand our views and practices regarding your and your student's data and how we will treat it.

2. Personal Information We Hold About You

2.1 Depending on your relationship with Westminster Tutors, we may collect and hold:

- Your name, title, contact details, signature, and relationship to the student;
- Information about parental responsibility, guardianship, authority to act, and emergency contact arrangements;
- Information provided during enquiries, admissions, enrolment, and withdrawal;
- Contract, fee, invoice, payment, refund, and account information;
- Information about relevant family or personal circumstances;
- Correspondence, meeting notes, complaints, requests, and records of communications involving you;
- Information relevant to safeguarding, health, accessibility, or emergency arrangements;
- Information generated through your use of our website, accounts, systems, internet connection, and online services;
- Photographs or recordings involving you where relevant; and
- CCTV images and associated dates and times when you visit our premises.

2.2 We will collect only the information that is relevant and reasonably necessary for the purpose for which it is used.

3. Where Your Information Comes From And Who We Share It With

3.1 We may receive personal information directly from you and, where relevant and lawful, from:

- The student and other parents, carers, emergency contacts or authorised representatives;
- Current or previous education providers, teachers, examination bodies and universities;
- Local authorities, healthcare professionals and safeguarding agencies; and
- Payment providers, service providers, professional advisers and public authorities.

We will collect only the information that is relevant and reasonably necessary for the purpose for which it is used.

3.2 Where necessary and lawful, we may share relevant information with:

- The student and other parents, carers, emergency contacts, or authorised representatives;
- Staff and independent teachers;
- Examination bodies, education providers, universities, local authorities, healthcare professionals, social services, the police, emergency services, and safeguarding agencies;
- UK Visas and Immigration, regulators, courts, HMRC, and other public authorities;
- Companies within the David Game group where they provide relevant governance, administrative, financial, IT, or professional support; and
- Service providers, payment providers, debt recovery providers, insurers, accountants, solicitors, and other professional advisers who help us operate Westminster Tutors and are required to protect your information.

3.3 We share only information that is necessary, proportionate, and relevant to the particular purpose.

3.4 We may use your contact information to provide appropriate reports and communications about a student's attendance, punctuality, academic progress, assessment outcomes, engagement, and fees. Any disclosure of student information must have an appropriate lawful basis and remains subject to the student's rights.

3.5 If a student is aged 18 or over, you do not have an automatic right to their information because you are their parent, carer, client, or fee-payer. Routine reporting may continue where it is necessary, proportionate, properly explained to the student, and supported by an appropriate lawful basis. It does not provide unrestricted access to the student's complete record.

4. Contact Us If You Have Questions

4.1 If you have questions about this notice or how your information is used, please contact the Principal at info@westminstertutors.co.uk.

4.2 Westminster Tutors has assessed that it is not currently required to appoint a Data Protection Officer.

5. How and Why We Use Your Information

5.1 We may use your personal information to:

- Respond to enquiries and administer admissions and enrolment;
- Coordinate the student's programme, timetable, examinations, mentoring, and other College services;
- Communicate with you about attendance, progress, engagement, welfare, safeguarding, and College arrangements;
- Administer contracts, fees, payments, refunds, and accounts;
- Confirm your identity, relationship to the student, parental responsibility, or authority to act;
- Manage emergencies, safeguarding concerns, health and safety matters, complaints, and disputes;
- Operate and protect our premises, accounts, systems, and services;
- Meet our legal, regulatory, safeguarding, immigration, examination, tax, and accounting responsibilities; and
- Establish, exercise, or defend legal rights.

5.2 Depending on the purpose, we rely on one or more of the following lawful bases:

- The processing is necessary to take steps at your request or perform a contract with you;
- The processing is necessary to comply with a legal obligation;
- The processing is necessary to protect someone's vital interests;
- The processing is necessary for our legitimate interests, or those of another person, provided that those interests are not overridden by your rights and interests; or
- You have given valid consent for a specified purpose.

5.3 Our legitimate interests include administering admissions and College services, coordinating education delivered by independent teachers, communicating with families and fee-payers, collecting fees, supporting students' progress and welfare, maintaining security, investigating concerns, and operating Westminster Tutors effectively.

5.4 We use CCTV in designated entrance, circulation, and examination-security areas for safeguarding, access control, crime prevention, protection of property and examination materials, and investigation of specific incidents. We rely on legitimate interests for this processing. The system does not record audio or use facial recognition or automated analytics.

5.5 Where information is needed to process an application, enter into or perform a contract, administer fees, respond to an emergency, or meet a legal or safeguarding responsibility, we will explain this where appropriate. If the information is not provided, we may be unable to process an application, enter into a contract, provide particular services, communicate effectively, or meet our responsibilities.

5.6 We do not currently make decisions about you based solely on automated processing that have legal or similarly significant effects.

6. Sensitive Personal Information

6.1 We may occasionally need information about your health, disability, racial or ethnic origin, religion or beliefs, or other sensitive matters where this is relevant to accessibility, safeguarding, emergency arrangements, or another legitimate purpose.

6.2 We will use sensitive information only where both an appropriate lawful basis and an additional legal condition apply. Depending on the circumstances, this may include explicit consent, protecting someone's vital interests, safeguarding or another substantial public interest supported by law, or establishing, exercising, or defending legal claims.

6.3 Criminal-offence information will be used only where this is necessary, lawful, and appropriately protected.

7. Where We Rely On Consent

7.1 We rely on consent only where it is appropriate. You may refuse or withdraw consent without disadvantage. Withdrawal will not affect any processing that was lawful before consent was withdrawn.

7.2 We may send you information about Westminster Tutors' services or events where permitted by law. You may ask us to stop sending promotional communications at any time. Essential administrative, contractual, fee, safeguarding, or student-related communications are not marketing and may continue where necessary.

7.3 We obtain appropriate consent before using identifiable photographs or videos for marketing or promotional purposes. Where the image is of a student under 18, we will obtain consent from a parent or carer and take account of the student's wishes. Students aged 18 or over provide their own consent.

7.4 You can withdraw consent or object to direct marketing by contacting info@westminstertutors.co.uk.

8. Transfers Outside The United Kingdom

8.1 Some service providers may process or store your personal information outside the United Kingdom.

8.2 Where this involves a restricted international transfer, we will ensure that it is permitted by data protection law. This may include relying on UK adequacy regulations, UK-approved contractual safeguards, or a relevant statutory exception.

8.3 You may contact the Principal for further information about the safeguards applying to an international transfer involving your information.

9. Your Rights

9.1 Depending on the circumstances, you may have the right to:

- Ask for access to the personal information we hold about you;
- Ask us to correct inaccurate or incomplete information;
- Ask us to delete your information;
- Ask us to restrict how we use your information;
- Receive certain information in a structured, commonly used, and machine-readable format, or ask us to transfer it to another organisation;
- Withdraw consent where we rely on consent;
- Object to direct marketing; and
- Be told about a personal data breach where the law requires us to notify you.

These rights do not apply in every circumstance, and legal exemptions may sometimes allow or require us to refuse or limit a request.

9.2 Right to object: You may object to processing based on legitimate interests. We will consider your objection and stop the processing unless we have compelling legitimate grounds to continue or the processing is required for legal claims.

9.3 Your rights under this notice relate to your own personal information. A request for information about a student will be considered separately.

9.4 The right of access to a student's information belongs to the student. Where a student is competent to exercise their own rights, we will normally require their authority before another person acts for them. Where a student is not competent, a person with parental responsibility may ordinarily act where this is consistent with the student's best interests. A person acting for a student aged 18 or over must provide evidence of their authority or other legal entitlement.

9.5 To exercise your rights, contact the Principal at info@westminstertutors.co.uk. We may ask for information reasonably necessary to confirm your identity, clarify your request, or verify your authority to act for another person.

10. How Long We Keep Your Information

10.1 We keep personal information only for as long as it is needed for the purpose for which it was collected or as required by law, safeguarding responsibilities, contractual requirements, or legitimate business needs.

10.2 Information forming part of the core student education record, including the registration form, is generally retained until the student's 25th birthday. A minimal permanent record of the student's full name, date of birth, enrolment dates and final examination results is kept for long-term verification. This does not mean that all information about you is retained for those periods. Financial, contractual, safeguarding, complaint and other records follow the specific periods and exceptions in our Data Retention Policy.

11.1 Routine CCTV footage must be automatically deleted or overwritten no later than 30 calendar days after recording. Relevant footage may be preserved for an identified safeguarding concern, incident, investigation, complaint, information-rights request or legal obligation. Preserved footage is kept securely for only as long as necessary for that purpose, with the reason and review date recorded.

11. Changes to This Privacy Notice

11.2 We may update this notice where our use of personal information, legal requirements, or regulatory guidance changes. We will bring significant changes to your attention

12. Data Controller and Complaints

12.1 Westminster Tutors Ltd is the data controller. Questions, requests, and complaints about how we use your personal information should be directed to:

The Principal
Westminster Tutors Ltd
86 Old Brompton Road
London
SW7 3LQ
info@westminstertutors.co.uk

Westminster Tutors Ltd is registered with the Information Commissioner's Office under registration number ZA804163.

12.2 If you believe we have not handled your information properly, you may make a complaint using the College's Complaints Procedure or by contacting the Principal. We will acknowledge a data protection complaint within 30 days, investigate it without undue delay, keep you appropriately informed, and communicate the outcome.

12.3 You may also complain to the Information Commissioner's Office. Information is available at www.ico.org.uk, or you can telephone 0303 123 1113.

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