Westminster Tutors

Student 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 all students, including students aged 18 or over. If anything in this notice is unclear, or you have questions about how we use your information, you can contact the Principal at info@westminstertutors.co.uk.

2. What Personal Information Might The College Hold About You

2.1 Depending on your circumstances, we may collect and hold:

- Your name, date of birth, contact details, photograph, and other identifying information;
- Information about your parents, carers, emergency contacts, home circumstances, and fee arrangements;
- Admissions, enrolment, previous education, immigration, and right-to-study information;
- Your courses, timetable, attendance, punctuality, academic work, assessments, predicted grades, reports, qualifications, examination entries, access arrangements, and university applications;
- Information about your health, disabilities, special educational needs, wellbeing, pastoral support, safeguarding, behaviour, and accidents;
- Information about your racial or ethnic origin, religion or beliefs, and other sensitive information where relevant;
- Correspondence, meeting notes, complaints, and records of communications involving you;
- Information generated through your use of our accounts, systems, internet connection, and online learning services, including access, filtering, and monitoring records;
- Photographs and CCTV images, together with relevant dates and times; and
- If you consent to biometric access, your name, a biometric template generated from measurements of your fingertip, entry and exit records, and recorded occupancy status. We do not intentionally retain a conventional fingerprint image.

3. Information We Receive From, And Share With, Other People or Companies

3.1 We may receive personal information directly from you and from:

- Your parents, carers, emergency contacts, or fee-payer;
- Your current or previous education providers and teachers;
- Examination boards, awarding organisations, UCAS, universities, local authorities, healthcare professionals, and safeguarding agencies; and
- Government bodies and other organisations where this is necessary and lawful.

We also create information through your attendance, studies, assessments, use of our systems, and participation in college life.

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

- Your parents, carers, or identified fee-payer;
- Staff, teachers, examination boards, awarding organisations, partner examination centres, UCAS, universities, and other education providers;
- Local authorities, healthcare professionals, social services, the police, emergency services, and safeguarding agencies;
- UK Visas and Immigration, regulators, courts, and other public authorities; and
- Service providers and professional advisers who help us operate the College and are required to protect your information.

3.3 We routinely share relevant information about attendance, punctuality, academic progress, assessment outcomes, engagement, and fee administration with identified parents, carers, or fee-payers where there is an appropriate lawful basis.

3.4 If you are aged 18 or over, your parents, carers, or fee-payer do not have an automatic right to your information. We may continue the routine sharing described in paragraph 3.3 where this is necessary, proportionate, and supported by an appropriate lawful basis. You may object to this sharing by contacting the Principal. We will consider your objection carefully, although it may not always require us to stop sharing. We will not routinely share sensitive pastoral, health, or safeguarding information unless there is an appropriate lawful basis for doing so.

3.5 Routine reporting does not give a parent, carer, or fee-payer unrestricted access to your complete record. We will not routinely share sensitive pastoral, health, or safeguarding information unless there is an appropriate lawful basis for doing so.

4. Contact Us if You Have Further 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. Westminster Tutors has assessed that it is not currently required to appoint a Data Protection Officer.

5. How The College Uses Your Information

5.1 We may use your personal information to:

- Consider your application and manage your enrolment;
- Provide and coordinate your education, timetable, assessments, examinations, mentoring, and pastoral support;
- Monitor and report on your attendance, punctuality, progress, attainment, and engagement;
- Support your health, wellbeing, safety, special educational needs, disabilities, and access arrangements;
- Meet our safeguarding, legal, regulatory, immigration, examination, and health and safety responsibilities;
- Administer fees, contracts, complaints, and college operations;
- Communicate with you and, where appropriate, your parents, carers, fee-payer, teachers, and other organisations;
- Protect our premises, systems, students, staff, teachers, visitors, and examination materials; 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 providing and administering education, supporting students' progress and welfare, communicating with families and fee-payers, administering examinations, operating securely and effectively, protecting people and property, maintaining IT security, and investigating complaints or incidents.

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 required for enrolment, examinations, safeguarding, legal compliance, or the provision of educational services, we will explain this where appropriate. If the information is not provided, we may be unable to enrol you, enter you for examinations, provide particular services or support, or meet our legal 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 Data

6.1 Some information requires additional protection. This includes information about your health, disabilities, racial or ethnic origin, religion or beliefs, sexual orientation, and biometric information used to identify you.

6.2 We may use this information to support your health, safety, wellbeing, special educational needs, access arrangements, religious requirements, safeguarding, and equality of opportunity, or to operate the optional biometric access system.

6.3 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, healthcare or social-care purposes where the legal requirements are met, or establishing, exercising, or defending legal claims.

7. Where We Need Your 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 obtain appropriate written consent before using identifiable photographs or videos for marketing or promotional purposes. Where you are under 18, we will obtain consent from your parent or carer and take account of your wishes. If you are aged 18 or over, you provide your own consent. We will stop future use following withdrawal where reasonably practicable, although we may be unable to recall materials already distributed or published by others.

7.3 Where information about matters such as your racial or ethnic origin or religion is requested on an optional basis, you do not have to provide it. If you do provide it, we may use it to support your needs and monitor equality of opportunity.

7.4 Biometric access is optional. It is used to control access, maintain an occupancy record, and support emergency evacuation procedures. It is not used to record lesson attendance, monitor punctuality, or assess your conduct or performance.

7.5 If you are under 18, we will seek written authorisation from you and your parent or carer before enrolling you on the biometric system. We will not process your biometric information if you or your parent or carer objects. If you are aged 18 or over, you provide your own written consent.

7.6 7.6 You may refuse or withdraw biometric consent without disadvantage and use the reception buzzer instead. Consent may be withdrawn by emailing info@westminstertutors.co.uk. Biometric use will be disabled on withdrawal, and your biometric template will normally be deleted within one working day after we receive your request. Working days are Monday to Friday, excluding bank holidays in England, and include working days during College holidays.

8. Transfer of Personal Information Outside The Country

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;
- Object to particular uses of your information, including processing based on legitimate interests;
- 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 If you are under 18 but have sufficient understanding to exercise your own data protection rights, we will normally deal directly with you. A parent, carer, or other person may act for you where you have authorised them or where you are not able to exercise the right yourself and it is appropriate for them to act in your best interests.

9.3 If you are aged 18 or over, another person may normally exercise your rights only if you have authorised them or they have another legal entitlement to act for you.

9.4 To exercise any of these 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 another person's authority to act for you.

10. How Long We Keep Your Personal 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, examination requirements, or legitimate business needs.

10.2 10.2 We generally retain your core student education record, registration form, academic reports and SEND records until your 25th birthday. We retain a minimal permanent record of your full name, date of birth, enrolment dates and final examination results so that we can verify your studies and qualifications many years later. Other records follow the specific periods and exceptions in our Data Retention Policy.

10.3 Biometric templates and active user profiles are deleted within five working days of confirming that access is no longer required. The annual September review checks that departures have been dealt with. If consent is withdrawn, biometric use is disabled and the template is normally deleted within one working day, including working days during College holidays. Biometric entry and exit records are retained until the end of the relevant academic year plus three years.

10.4 10.4 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

11.1 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
86 Old Brompton Road, London, SW7 3LQ
(or by email at: info@westminstertutors.co.uk)

12.2 If you believe we have not handled your information properly, you may make a complaint using the College's Complaints Procedure. 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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