

Westminster Tutors



Website Cookie Policy

2026-2027

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1. Introduction

- 1.1 Westminster Tutors Independent Sixth Form College (“we”, “us” and “our”) is committed to protecting your privacy and explaining how cookies are used on www.westminstertutors.co.uk. This policy explains what cookies and similar technologies are, the purposes for which they may be used, and how you can make and change your choices.
- 1.2 We must comply with the Privacy and Electronic Communications Regulations 2003 (PECR), as amended, including by the Data (Use and Access) Act 2025. Where cookies or similar technologies involve personal information, the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 also apply. Our privacy notices explain how we handle personal information.

2. What are cookies

- 2.1 Cookies are small text files placed on your computer, phone or other device when you visit a website. They can remember information such as your preferences or a previous visit. Similar rules apply to other ways of storing information on, or accessing information from, your device, including local storage, tracking pixels and device fingerprinting.
- 2.2 Session cookies normally last for a browsing session. Persistent cookies remain until their expiry date or until you delete them. First-party cookies are associated with the website you visit; third-party cookies are associated with another domain. A third-party service can also use first-party cookies, so the domain alone does not show who receives the information.

3. Types and purposes of cookies

- 3.1 The website’s cookie notice describes necessary cookies and optional cookies used by third party services to understand how visitors use the site. The college must keep the information in its cookie notice and controls accurate, including each technology’s name, provider, purpose and duration, and whether information is shared with another organisation.
- 3.2 Essential cookies support a service you have requested, for example where storage or access is strictly necessary for that service or solely for transmitting a communication. These uses can be exempt from consent under PECR. A cookie is not exempt simply because it is useful to the college, labelled ‘necessary’, or supplied by a third party.
- 3.3 Performance and analytics cookies help us understand visits and improve the website. Our published cookie notice uses consent for optional analytics. We must not assume that all analytics information is anonymous: identifiers and other information may be personal data even when reports are aggregated.
- 3.4 Functionality cookies can remember choices or provide additional features. Where a feature uses optional storage or access, the college must explain its purpose and obtain consent unless a specific PECR exception applies. An embedded service must not introduce undisclosed optional tracking.
- 3.5 Targeting and advertising cookies are used to select or measure advertising or track activity across services. Before introducing these technologies, the college must review them and update the cookie information. They must not be used without prior consent.

- 3.6 PECR now includes conditional exceptions for certain statistical and appearance or functionality purposes. The college must assess and document every condition before relying on either exception. For both exceptions, it must provide clear information and a simple, free means of objecting, and stop the relevant storage or access if a visitor objects. The presence of an analytics or preference cookie does not by itself establish that an exception applies.

4. Managing your cookie choices

- 4.1 Our approach is to seek consent for optional cookies described in the website's notice. Cookies requiring consent must remain off until you make an informed, affirmative choice. Closing the banner, continuing to browse, or leaving a browser's default settings unchanged does not give consent.
- 4.2 The website's cookie controls must provide clear choices to accept, reject or customise optional cookies by purpose. Rejecting must be as easy as accepting. Options must be understandable and must not use pre-selected consent, misleading presentation or pressure to accept. The college must record choices and respect refusals.
- 4.3 You can withdraw consent at any time. The website must provide an easily accessible on-site way to revisit your choices, and withdrawing consent must be as easy as giving it. When you withdraw consent, further storage, access and personal information processing that depend on it must stop. The college must communicate the withdrawal to relevant providers and address any applicable erasure requirements. Withdrawal does not affect the lawfulness of earlier processing based on consent.
- 4.4 Your browser's help section explains how to block or delete cookies and manage stored website data. These browser controls are additional tools; they do not replace the website's own consent and withdrawal controls. Blocking necessary cookies may prevent parts of the website from working. If you delete the cookie that remembers your choice, or use another browser or device, you may need to choose again.

5. Third party services

- 5.1 Third party services, including analytics tools and embedded content, may store or access information on your device or receive personal information. The college must identify the services actually in use and explain their purposes, any recipients of information and relevant retention periods. A provider's privacy policy can give further information, but does not replace our own responsibility for the use of its tools on our website.
- 5.2 Before adding or changing a third party service, the college must check its cookies and similar technologies, consent settings and data protection arrangements. Where personal information is processed, an appropriate UK GDPR lawful basis and other applicable safeguards are also required. A lawful basis under the UK GDPR does not remove a PECR consent requirement.

6. Changes and queries

- 6.1 The Principal is responsible for reviewing this policy and arranging checks with the website provider. The policy and cookie controls must be reviewed at least annually and when technologies, purposes, providers or relevant law change. Updated information and fresh consent must be provided where required before a new use begins.
- 6.2 The review must include:
- an up-to-date record of the technologies, providers, purposes and durations, with the consent or exception used for each;
 - checks on representative pages before any choice, after rejection, after acceptance and after withdrawal; and
 - confirmation that this policy, the privacy notices, the cookie information and the website's actual behaviour agree.
- 6.3 If you have questions about this policy, your cookie choices or our use of personal information, contact the Principal at info@westminstertutors.co.uk or Westminster Tutors, 86 Old Brompton Road, London SW7 3LQ. You can also find information about cookies and your rights on the Information Commissioner's Office website at ico.org.uk.

Ownership and consultation	
Document author (name)	Sean Doherty, Principal

Audience	
Audience	Principal, college staff, parents, students, and general public

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