



Recording and Storing Information Policy



Background

APPLA tuition is a non-statutory organisation that became a limited company in 2017. Safeguarding and promoting the welfare of children and young people who access our tutoring services is paramount in all the work we do and in all the decisions we take. All APPLA policies and procedures should be understood in this context. We recognise the right of all children and young people, regardless of any 'protected characteristics', to grow and develop in circumstances where they feel safe and supported, so that they can achieve optimal outcomes throughout their childhood, their teenage years and into adulthood.

Our team of carefully selected tutors provide friendly, quality tuition that is tailored to each individual student. We know that a small amount of support can make a huge difference to the lives of our students - now and in the future - and we work hard to deliver a service which is geared towards boosting confidence and boosting grades.

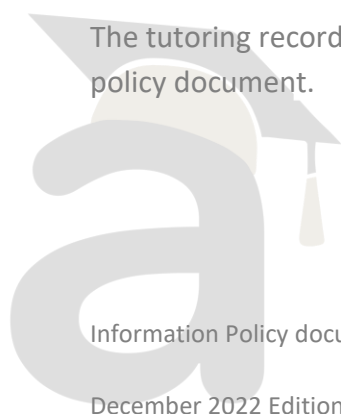
APPLA tuition tutors work with individuals on a one-to-one basis as well as in small groups. We have supported students in home and school environments since 2017. We became an accredited and approved Tuition Partner for the Department for Education's National Tutoring Programme in 2021. In the same year we delivered in excess of 5000 hours of tuition and reached more than 700 students.

In accordance with Data Protection regulations (2018) we are registered (ZB024092) with the Information Commissioner's office (ICO). We apply the General Data Protection Regulations (2018) to any personal information held in our systems.

We use different types of information and records to run our service effectively including:

- identifying information on tutors and students
- personnel records
- records of tutor visits
- records of students that have attended a tutoring session
- tutor session feedback reports
- tutor performance reviews by students
- student evaluation reports from tutors
- quality assurance monitoring

The tutoring records held by APPLA tuition are described in more detail in the Progress policy document.



The purpose and scope of this policy

APPLA tuition are committed to accurate record keeping, secure storage of information and secure destruction of personal records. This policy will define the time limits for retaining records. *See appendix I for record retention storage times.*

Roles and Responsibility

The Managing Director has overall responsibility for this policy and has appointed the Business Manager as the designated Data Protection Officer (DPO) for APPLA tuition. The role of the DPO includes:

- monitoring compliance with the UK GDPR and other data protection laws and our data protection policies
- Act as a contact point for the ICO
- Raising awareness of data protection
- liaising with the schools' data protection officers regarding any concerns/issues
- To be trained in the knowledge and skills required to carry out the role.
- Providing data protection training to APPLA representatives
- Auditing records to ensure GDPR compliance

Our administrative processes are overseen by the Business Manager with support from an administration assistant. They handle invoicing, notes management, diary management (including holidays and sickness), paperwork such as DBS certificates and insurance. The Business Manager is responsible for ensuring all internal admin is up-to-date and accurate. They are responsible for all internal audits.

The management team, which consists of the Managing Director, Business Manager and Accounts Manager(s) are responsible for ensuring that all received records are stored securely, forwarded to the appropriate destination and only retained for the defined time limit. They are also responsible for the secure destruction of personal records.

It is the responsibility of every APPLA representative to maintain accurate records and to forward these to the APPLA Management Team in a timely manner.

Everyone is responsible for following the data protection principles when using personal data. They must make sure the information is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary

- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage (GDPR 2018).

This policy applies to anyone working on behalf of APPLA tuition, including senior managers, paid staff, volunteers, sessional workers, agency staff and students.

References

This policy is based on legislation, policy and guidance that seeks to provide accurate information, appropriate storage of information and apply the GDPR principles to any personal information, including:

- Data Protection Act: 2018
- General Data Protection Regulations 2018 (GDPR)
- Data Protection-GOV.UK
- Working Together to Safeguard Children 2018
- HM revenues and Customs: Records Management and Retention and Disposal Policy

This policy statement should be read alongside other related documents, including:

- Safeguarding policy document
- Whistleblowing policy document
- Recruitment policy document
- Progress policy document

Record Types:

Company Records

APPLA tuition will follow government guidelines on keeping records about the company itself and financial and accounting records. APPLA tuition will tell Companies House if the records are kept somewhere other than the company's registered office address.

Tutoring service agreements

APPLA tuition keeps records of agreements to supply tutoring services to schools and individuals in the local area.

Personnel records

Personal details for any APPLA representative, such as name and date of birth are recorded on the induction template and kept in individual folders, securely in the office. Other records including job descriptions, contract details, enhanced DBS checks, training records, previous employment, qualifications, performance reviews, disciplinary actions, grievances etc are also kept in these folders (see Recruitment policy document).

Recruitment records

APPLA tuition keep the details of job adverts, records of shortlisting and interviews in the office.

Whistleblowing records

Serious allegation records are detailed in the Whistleblowing policy document. Only the Managing Director has access to these records.

Student records

1. **Personal data:** APPLA tuition keeps records of the full names of all its students on file. It also holds the addresses of students that are tutored on a one-to one basis at home. APPLA management personnel have computer access to these details. These details are only given to the allocated tutor/s that will be tutoring the students. Any shared records only contain the students' first name and initial of their surname.
2. **Attendance registers:** Student attendance registers are completed for school contracts. These have the date and time of the session, name of tutor and students' first name and initial of their surname. The tutor completes the attendance record and forwards it, each week, by email to the APPLA management team.
3. **Progress records:** details of student progress and achievements is collated from reports received from all the tutors and stored electronically by the APPLA management team. This information is shared with teachers from school contracts and parents/guardians of individual contract students.
4. **Online tutoring consent forms:** In compliance with our safeguarding policy, we have online face to face tuition consent forms which must be signed by the parents/guardians/carers of students who access our online services. These consents include permission to record and store videos from online sessions.
5. **Safeguarding concern:** Details of any safeguarding concerns are stored securely by the managing director only and forwarded to the children's social care team at Warrington council or the NSPCC as detailed in the safeguarding policy document.

Records of online tutoring sessions

Logs of all online work which has taken place – including times, dates, who was present (students' first name and initial of their surname)/tutor and recordings of the sessions are stored as well as chat logs.



Reports

Tutors are required to complete reports of each tutoring session and email them to the APPLA management team each week. The content and processing of reports is described in more detail in the Progress policy document. These reports must be an accurate reflection of the session and have a standard format to help with the quality of feedback. Training on completion of reports is provided to tutors at induction, see Recruitment policy document. All reports are signed and dated by the person who makes them.

Tutor performance reviews

To ensure a continual quality tutoring service, APPLA management regularly review tutor performance, see the Progress policy document. This is facilitated by monitoring student progress reports and feedback from school contracts and students as well as spot checks/observations by senior tutors. These records are kept securely in personnel files in the APPLA tuition's office.

Security of Information

Hard copies of records including personal information are kept securely in the APPLA tuition office. The office is in a secure, well-maintained building. Only the APPLA tuition management team have access to this office.

Electronic records are protected using encryption. Access to these records is limited to the APPLA tuition management team only, by means of usernames and passwords.

Appropriate privacy settings are in place for all online tutoring sessions. All lessons are set up with password protection and waiting rooms to ensure that unauthorised persons cannot gain access to the session.

Disposal of Records

Once records have reached the storage limit (*see appendix I*), they are destroyed. Hard copies are shredded or burnt, and electronic records are deleted from the computer database. If the computer containing the records is to be disposed of, APPLA tuition will physically damage the data disk to prevent outside access to any stored records.

Appendix I: Record retention storage limits

Record Type	Paper/ Electronic	Storage limit	reference
Agreements for services with schools	E	6 years from the end of the last company financial year they relate to	HMRC
Audits	P/E	6 years	GOV.UK
Financial and accounting Records	E	6 years from the end of the last company financial year they relate to	HMRC
Incorporated documents: e.g., certificate of incorporation	P	Permanently	GOV.UK
Individual tutoring arrangements	E	One year after cessation	GDPR
Online tutoring sessions	E	One year after cessation	GDPR
Personnel Files and Training Records:	P	6 years from the end of employment.	GOV.UK
Quality assurance evaluations	P/ E	6 years	GOV.UK
Safeguarding records	P/E	until the child is 25	IRMS 2019
Student records	P/ E	One year after cessation	GDPR
Tutor performance reviews	P/ E	6 years from the end of employment.	GOV.UK
Tutor reports	P/ E	One year after cessation	GDPR
Whistleblowing reports	P/E	Personal data processed by a whistle-blowing scheme should be deleted, promptly, and usually within two months of completion of the investigation of the facts alleged in the report	Article 29 of the Data Protection Working Party

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