

Trust- Education Group Ltd

GDPR Policy

Introduction

Trust-Education Group Ltd recognises its duty to comply with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. As an independent SEMH school, we handle a significant amount of personal and sensitive information relating to students, parents/carers, staff, and partners.

The purpose of this policy is to ensure that all personal data is processed fairly, lawfully, and securely, and that individuals' rights are protected at all times.

Scope

This policy applies to:

- All staff, governors, external providers and volunteers who process personal data on behalf of Trust-Education.
- All personal data, whether stored electronically, on paper, or in other formats.
- All data processing activities carried out within Trust-Education Group Ltd.

Data Protection Principles

Trust-Education Group Ltd is committed to the seven principles of data protection. Personal data will be:

1. Processed lawfully, fairly and transparently.
2. Collected for specified, explicit and legitimate purposes.
3. Adequate, relevant and limited to what is necessary.
4. Accurate and kept up to date.
5. Retained only as long as necessary for the intended purpose.
6. Kept secure, protecting against unauthorised access, loss or damage.
7. Accountable, with records kept to demonstrate compliance.

Roles and Responsibilities

- **Board of Governors:** Overall accountability for GDPR compliance.
- **Senior Leadership Team:** Ensures staff are trained, systems are compliant, and monitoring is effective.
- **Data Protection Officer (DPO):** Provides advice, monitors compliance, manages Subject Access Requests and data breaches, and liaises with the Information Commissioner's Office (ICO).
- **All Staff:** Must handle data responsibly, follow policy, and report breaches immediately.
- **Third Parties:** Must comply with Trust-Education's GDPR standards under formal agreements.

Lawful Basis for Processing

Trust-Education Group Ltd will only process personal data where a lawful basis exists under Articles 6 and 9 of the UK GDPR. These may include:

- **Legal obligation:** compliance with safeguarding and education law.
- **Public task / legitimate interest:** delivering education, wellbeing and SEMH support.
- **Contract:** fulfilling staff, supplier, and service agreements.
- **Consent:** for optional activities (e.g., photographs, publicity).
- **Vital interests:** protecting life in emergencies.

For special category data (health, therapy, safeguarding, SEN), processing is carried out under:

- Substantial public interest (safeguarding children).
- Provision of health and social care.

Categories of Data Processed

Trust-Education Group Ltd processes:

- **Student Data:** personal identifiers, academic progress, attendance, safeguarding records, EHCPs, health and therapy information.
- **Parent/Carer Data:** contact details, custody arrangements, communication preferences.
- **Staff Data:** employment contracts, payroll, DBS checks, training, HR records.
- **Other Data:** governors, contractors, and visitors' details where required.

Data Sharing

Personal data may be shared with authorised third parties where necessary and lawful, such as:

- Local Authorities
- NHS, CAMHS, GPs, and therapy providers.
- Social Services and safeguarding partners.
- Examination boards and education providers.
- Law enforcement agencies.

All external organisations must comply with GDPR and sign a Data Processing Agreement where appropriate.

Data Security

Trust-Education protects personal data by ensuring that:

- Systems and devices are encrypted and password-protected.
- Paper records are securely stored and access-controlled.
- Data is only accessible by staff with a legitimate need to know.
- Secure disposal methods are used (shredding, digital wiping).
- Regular monitoring and audits are carried out.

Data Retention

Data is retained in line with statutory guidance and Trust-Education's retention schedule, for example:

- Student records: until the student is 25 years old.
- Safeguarding files: in line with legal safeguarding requirements.
- Staff records: 6 years after employment ends.
- Financial records: 7 years for audit purposes.

Rights of Individuals

Under GDPR, individuals have the right to:

- Be informed about how their data is used.
- Access their personal data (Subject Access Request).
- Request correction of inaccurate data.
- Request deletion of data, where lawful.

- Restrict or object to certain processing.
- Request data portability (where applicable).

Requests should be submitted in writing to the DPO. Responses will be made within **one calendar month**.

Data Breaches

- All data breaches must be reported immediately to the Data Protection Officer.
- The Data Protection Officer will investigate and, if necessary, report to the information Commissioner's Office within 72 hours.
- Where a breach presents a high risk to individuals, those affected will be informed.
- All breaches will be logged and reviewed to prevent recurrence.

Training and Awareness

- All staff receive GDPR training at induction and annually thereafter.
- Staff working with sensitive data (safeguarding, SEN, therapy) receive enhanced training.
- Regular reminders and updates are provided to maintain compliance.

Monitoring and Review

This policy is reviewed annually by the Data Protection Officer and approved by the Board of Governors. Updates are made sooner if there are changes in legislation, best practice, or school procedures.

Policy Lead	Melissa Wainman Director of Education
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Approval:	Trust-Education Group Board of Governors