



Trust- Education Group Ltd

GDPR and Data Protection Policy

Introduction

Trust-Education Group Ltd recognises that protecting personal information is a fundamental responsibility and an essential part of safeguarding, pupil welfare, professional conduct and effective school leadership.

As an independent specialist Social, Emotional and Mental Health (SEMH) provision, Trust-Education Group Ltd processes a significant amount of personal, confidential and sensitive information relating to pupils, parents, carers, staff, professionals and external partners. This information is necessary to ensure pupils receive appropriate education, support, safeguarding and care.

The school understands that information relating to pupils, particularly safeguarding records, special educational needs and disabilities (SEND), Education Health and Care Plans (EHCPs), medical information, therapeutic support and family circumstances, requires the highest levels of confidentiality and protection.

Trust-Education Group Ltd is committed to ensuring that all personal data is processed lawfully, fairly and transparently. The school will ensure that information is collected only where necessary, stored securely, accessed appropriately and shared responsibly in accordance with statutory duties.

Effective data protection supports the school's safeguarding culture by ensuring that information is available to those who need it to protect children, while preventing inappropriate access or disclosure.

This policy sets out how Trust-Education Group Ltd meets its responsibilities under UK data protection legislation and how all members of the school community are expected to manage information safely.

Legal and Statutory Framework

This policy has been developed with regard to the requirements of:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Privacy and Electronic Communications Regulations (PECR)
- Education (Independent School Standards) Regulations 2014
- Keeping Children Safe in Education (KCSIE) 2026
- Children Act 1989
- Children Act 2004
- Special Educational Needs and Disability Regulations
- Equality Act 2010
- Freedom of Information Act 2000 where applicable
- Information Commissioner's Office (ICO) guidance

Trust-Education Group Ltd recognises that data protection responsibilities must operate alongside safeguarding duties. The requirement to protect children from harm takes priority where information sharing is necessary to safeguard a child.

Purpose of the Policy

The purpose of this policy is to ensure that Trust-Education Group Ltd has robust arrangements in place to protect personal information and maintain public confidence.

The policy aims to ensure that:

- Personal data is processed lawfully and securely
- Staff understand their responsibilities regarding confidentiality
- Pupils and families understand how their information is used
- Information is shared appropriately with professionals and agencies
- Data breaches are identified and managed effectively
- Individuals can exercise their legal rights regarding their information
- School systems remain secure and appropriately managed

The policy also provides assurance that Trust-Education Group Ltd has appropriate arrangements in place to meet Ofsted expectations regarding safeguarding, leadership and management.

Scope

This policy applies to all individuals who process information on behalf of Trust-Education Group Ltd.

This includes:

- Employees
- Senior Leaders
- Teaching Staff
- Pastoral Staff
- Administration Staff
- Volunteers
- Contractors
- External Professionals
- Governors or Proprietors where applicable

The policy applies to all personal information held by the school, regardless of the format in which it is stored.

This includes:

- Electronic Records
- Paper Records
- Emails
- Digital Documents
- Photographs
- Videos
- Communication Records
- Assessment Information
- Safeguarding Records
- Medical Information
- Employment Records

All staff and individuals working on behalf of the school must understand that they have a professional responsibility to maintain confidentiality and protect personal information.

Data Protection Principles

Trust-Education Group Ltd follows the seven principles of data protection established within UK GDPR.

Personal data must be processed lawfully, fairly and transparently. The school will ensure that individuals understand why information is collected, how it will be used and who it may be shared with.

Personal data will only be collected for specific, clear and legitimate purposes. Information gathered for educational, safeguarding or operational purposes will not be used in ways that are incompatible with those purposes.

The school will ensure that information collected is adequate, relevant and limited to what is necessary. Staff must not collect or retain information that is not required to support pupils, fulfil legal duties or operate the school effectively.

Trust-Education Group Ltd will take reasonable steps to ensure information is accurate and kept up to date. Where errors are identified, information will be corrected promptly.

Personal data will not be retained indefinitely. The school will maintain appropriate retention arrangements to ensure information is securely stored only for as long as necessary.

All personal information will be stored securely and protected from unauthorised access, accidental loss, misuse, damage or disclosure.

Trust-Education Group Ltd accepts responsibility for demonstrating compliance with data protection legislation. The school will maintain evidence of its GDPR arrangements through policies, training records, audits, data processing agreements and monitoring procedures.

Roles and Responsibilities

The Proprietors of Trust-Education Group Ltd, Melissa Wainman and Katie Everson, hold overall responsibility for ensuring that effective governance arrangements are in place for data protection.

They ensure that appropriate resources, systems and procedures are available to support compliance with legislation and that significant data protection matters are appropriately reviewed.

The Co-Headteachers, Melissa Wainman and Katie Everson, are responsible for the day-to-day implementation of this policy. They ensure that staff understand their responsibilities, appropriate training is provided and information systems are managed securely.

The Co-Headteachers ensure that data protection remains embedded within school improvement, safeguarding and operational practice.

The Data Protection Officer provides specialist advice and guidance regarding GDPR compliance. The DPO monitors data protection arrangements, supports staff, advises on data processing activities, manages data protection concerns and liaises with the Information Commissioner's Office where required.

The Designated Safeguarding Leads, Janette Bashall, Ashleigh Haynes and Laura Wilding, ensure safeguarding information is managed securely and appropriately. They oversee safeguarding records, professional information sharing and ensure that confidentiality requirements are maintained while prioritising child protection responsibilities.

The Deputy Designated Safeguarding Leads, Melissa Wainman and Katie Everson, support safeguarding information management and ensure appropriate procedures are followed.

All staff working at Trust-Education Group Ltd have responsibility for protecting personal information. Staff must use information only for legitimate professional purposes, maintain confidentiality, follow school procedures and report concerns immediately.

Staff must never access information without appropriate authority, share personal information through unauthorised methods or disclose confidential information outside professional requirements.

Data Sharing And Partnership Working

Trust-Education Group Ltd recognises that effective partnership working is essential to supporting pupils' education, safeguarding and wider wellbeing. The school will share personal information only where there is a lawful basis to do so and where sharing supports a legitimate educational, safeguarding or operational purpose.

Information sharing decisions will always consider confidentiality, proportionality and the best interests of the pupil.

Information may be shared with appropriate external organisations including:

- Local Authorities
- Commissioning Bodies
- NHS Services
- CAMHS

- Social Care
- Police
- Education Welfare Services
- Educational Psychologists
- Speech And Language Therapists
- Occupational Therapists
- Examination Boards
- Other Education Providers

Trust-Education Group Ltd works closely with commissioning local authorities and professionals to ensure pupils receive appropriate support. Information relating to attendance, progress, safeguarding, behaviour, EHCP outcomes and provision may be shared where necessary.

Where information is shared with external organisations, the school ensures:

- The Sharing Is Lawful
- The Information Is Necessary
- The Information Is Accurate
- The Appropriate People Receive The Information
- Secure Methods Of Transfer Are Used

Where another organisation processes information on behalf of Trust-Education Group Ltd, appropriate agreements will be established, including Data Processing Agreements where required.

Information Sharing With Parents And Carers

Trust-Education Group Ltd recognises the importance of working collaboratively with parents and carers.

Parents and carers will receive appropriate information regarding:

- Their Child's Education
- Progress And Achievement
- Attendance
- Behaviour And Wellbeing
- Safeguarding Where Appropriate
- Medical Information Relevant To Their Child's Care

The school recognises that parental access to information may be affected by legal arrangements, safeguarding concerns or court orders.

Where there are concerns that sharing information with a parent or carer may place a child at risk, advice will be sought from safeguarding leaders and appropriate agencies.

Subject Access Requests

Under UK GDPR, individuals have the right to request access to personal information held about them.

This is known as a Subject Access Request (SAR).

Trust-Education Group Ltd will manage all requests in accordance with data protection legislation.

Requests should be submitted in writing to the Data Protection Officer.

The school will:

- Verify The Identity Of The Person Making The Request
- Identify Relevant Information
- Review Information Before Release
- Consider Third-Party Confidentiality
- Respond Within One Calendar Month Where Possible

Where a request is complex or involves a large amount of information, the school may extend the response period in line with legal requirements.

The school will provide information in an accessible format wherever possible.

Rights Of Individuals

Trust-Education Group Ltd respects the rights of individuals regarding their personal information.

Individuals have the right to:

- Be Informed About How Their Information Is Used
- Access Personal Information Held About Them
- Request Correction Of Inaccurate Information
- Request Restriction Of Processing Where Applicable
- Object To Certain Processing Activities
- Request Deletion Where There Is A Legal Right To Do So
- Request Data Portability Where Applicable

The school recognises that some rights may be limited where information is required to meet legal obligations, safeguard children or fulfil statutory responsibilities.

Photographs, Videos And Digital Images

Trust-Education Group Ltd recognises that photographs and videos are important tools for celebrating achievement, recording progress and evidencing learning.

The school may use photographs and videos for legitimate educational purposes, including:

- Recording Learning Activities
- Evidencing EHCP Outcomes
- Celebrating Achievement
- Supporting Assessment
- Creating Displays
- Supporting Communication With Families

The school ensures that photographs and videos are managed securely and appropriately.

Images will only be shared externally where there is an appropriate lawful basis and where necessary consent or other legal justification exists.

Staff must not:

- Take Photographs Using Personal Devices
- Share Images Through Personal Accounts
- Upload Pupil Images To Unapproved Platforms
- Store Pupil Images Outside Approved Systems

Any concerns regarding inappropriate use of images will be investigated and managed through safeguarding and disciplinary procedures where required.

CCTV

Where CCTV is used on school premises, Trust-Education Group Ltd ensures that it operates in accordance with UK GDPR, the Data Protection Act 2018 and relevant ICO guidance.

CCTV is used to:

- Support The Safety Of Pupils And Staff
- Protect School Property
- Assist With Incident Investigation
- Support Safeguarding Where Appropriate

CCTV footage is accessed only by authorised individuals and will not be disclosed unless there is a lawful reason to do so.

Appropriate signage will inform visitors and members of the school community that CCTV is in operation.

Data Breaches

Trust-Education Group Ltd recognises that a data breach may occur when personal information is:

- Lost
- Stolen
- Accessed Without Permission
- Shared Incorrectly
- Accidentally Disclosed
- Destroyed Without Authorisation

All staff have a responsibility to report suspected data breaches immediately to the Data Protection Officer or a member of the Senior Leadership Team.

Examples of breaches may include:

- Sending Information To The Wrong Person
- Losing A Device Containing Personal Data
- Leaving Confidential Documents Unsecured
- Unauthorised Access To Systems

When a breach occurs, the school will:

- Assess The Level Of Risk
- Contain The Breach
- Record The Incident
- Investigate The Cause
- Take Action To Prevent Recurrence
- Notify The Information Commissioner's Office (ICO) Within 72 Hours Where Required

Where a breach presents a high risk to individuals, affected people will be informed appropriately.

All breaches will be recorded within a data breach log.

Data Retention And Secure Disposal

Trust-Education Group Ltd retains information only for as long as necessary.

Retention periods are determined by:

- Legal Requirements
- Department For Education Guidance
- Safeguarding Responsibilities
- Operational Requirements

Examples of retention periods may include:

Pupil educational records are retained in accordance with education record retention requirements.

Safeguarding records are retained in line with statutory safeguarding guidance and local safeguarding procedures.

Staff employment records are retained in line with employment and financial requirements.

Financial records are retained according to statutory accounting requirements.

When information is no longer required, it will be securely destroyed.

This may include:

- Confidential Shredding
- Secure Digital Deletion
- Removal From Systems

Staff Confidentiality And Professional Conduct

All staff at Trust-Education Group Ltd have a professional duty to maintain confidentiality.

Staff must understand that pupil information must only be accessed, discussed and shared for professional reasons.

Staff must:

- Discuss Pupils Only With Appropriate Professionals
- Maintain Confidentiality Outside School
- Follow Secure Communication Procedures
- Report Concerns Immediately
- Protect Information During Remote Working

Staff must not discuss confidential information in public areas or through personal communication channels.

Failure to maintain confidentiality may result in disciplinary action.

Training And Awareness

Trust-Education Group Ltd ensures that all staff receive appropriate GDPR training.

Training is provided:

- During Staff Induction
- Annually As Part Of Refresher Training
- Following Changes To Legislation
- Where Additional Training Needs Are Identified

Training includes:

- Data Protection Principles
- Confidentiality
- Secure Systems
- Information Sharing
- Cyber Security
- Data Breach Procedures
- Safeguarding Information Management

Staff working with sensitive information, including safeguarding, SEND and therapeutic records, receive additional guidance where required.

Monitoring, Audit And Review

Trust-Education Group Ltd monitors GDPR compliance through ongoing review and quality assurance.

Monitoring includes:

- Review Of Data Protection Procedures
- Staff Training Records
- Access Permissions
- Data Breach Records
- Information Sharing Arrangements
- System Security Checks

The Data Protection Officer and Senior Leadership Team review arrangements regularly to ensure continued compliance.

Any identified improvements are incorporated into school development planning.

Policy Review

This GDPR and Data Protection Policy applies for the academic year 2026–2027.

The policy will be reviewed annually or sooner where:

- Legislation Changes
- ICO Guidance Is Updated
- School Systems Change
- Significant Data Protection Issues Occur
- Safeguarding Requirements Change

The review will be completed by the Co-Headteachers and Data Protection Officer, with outcomes shared with the Proprietors.

Compliance Statement

Trust-Education Group Ltd is committed to maintaining the highest standards of data protection and confidentiality.

Through strong leadership, secure systems, effective training and robust monitoring, the school ensures that personal information is protected while enabling effective education, safeguarding and partnership working.

This policy demonstrates compliance with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Information Commissioner's Office Guidance
- Education (Independent School Standards) Regulations 2014
- Keeping Children Safe In Education (KCSIE) 2026
- Equality Act 2010

Trust-Education Group Ltd recognises that protecting information is an essential part of protecting children and maintaining a safe, respectful and professional learning environment.

Policy Lead	Melissa Wainman Proprietor
Date:	1st September 2026
Policy Review Date:	1st September 2027
Version:	1
Approval:	Matthew Embley Chair of the Governing Body