Data Protection Policy

This policy is effective for all schools within The Mead Educational Trust, the Teaching School, the SCITT and all other activities under the control of the Trust and reporting to the Trust Board.

Version	6.0
Ratified by	Executive Team
Date ratified	15th September 2026
Review date	February 2029

Revision History:

Version	Date	Author	Summary of Changes
6.0	Aug 2026	CBR	Changes to align with DUAA 2025: Added refs to DUAA 2025. 15 – added refs to expectations around SARs. 32 & App A – added data protection complaints procedures.
5.0	April 2025	CBR	Section 8 – new section on ROPA and RIA. Sections 11 and 32 - additions to reference Trust and School Data Protection Leads and that Trust Lead monitors the info@tmet.uk account. Section 30 - addition of reference to ICO fine. Section 31 – new section on DP compliance.
4.0	April 2024	CBR	Changed 'GDPR' to 'UK GDPR' and 'EU' or 'EU Member State Law' to 'UK Law' because the UK has left the EU and has formed its own data protection legislation.
Earlier version history is available on request.			

Contents

1 Introduction and definitions

1.1 Introduction

This Policy sets out the obligations of The Mead Educational Trust ("the Trust") regarding data protection and the rights of, inter alia, pupils, parents, staff and visitors ("data subjects") in respect of their personal data under the **UK General Data Protection Regulation (UK GDPR)**, the **Data Protection Act 2018 (DPA 2018)**, and the **Data (Use and Access) Act 2025 (DUAA).**

This Policy sets the Trust's obligations regarding the collection, processing, transfer, storage, and disposal of personal data. The procedures and principles set out herein must be followed at all times by the Trust, its employees, agents, contractors, or other parties working on behalf of the Trust.

The Trust is committed not only to the letter of the law, but also to the spirit of the law and places high importance on the correct, lawful, and fair handling of all personal data, respecting the legal rights, privacy, and the Trust of all individuals with whom it deals.

1.2 Legal Framework

We are committed to complying with:

- UK GDPR – governing the processing of personal data in the UK.
- DPA 2018 – providing additional provisions for education, safeguarding, and law enforcement.
- DUAA 2025 – refining data access rights, subject access request (SAR) handling, and recognised legitimate interests.

1.3 Definitions

The terms in this document have the meanings as set out in Article 4 of the UK GDPR unless amended by the Act.

For clarity, the following have been reproduced:

'**personal data'** means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

'data controller' means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law.

'processing' means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

'special category personal data' means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic

data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

2 The Data protection principles

This Policy aims to ensure compliance with the DPA, UK GDPR and DUAA. The UK GDPR sets out the following principles with which any party handling personal data must comply. All personal data must be:

2.1 Processed lawfully, fairly, and in a transparent manner in relation to the data subject.

2.2 Collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes. Further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.

2.3 Adequate, relevant, and limited to what is necessary in relation to the purposes for which it is processed.

2.4 Accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the purposes for which it is processed, is erased, or rectified without delay.

2.5 Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data is processed. Personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes, subject to implementation of the appropriate technical and organisational measures required by the UK GDPR in order to safeguard the rights and freedoms of the data subject.

2.6 Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

3 The rights of data subjects

The UK GDPR sets out the following rights applicable to data subjects (please refer to the parts of this policy indicated for further details):

- The right to be informed (Part 12)
- The right of access (Part 13)
- The right to rectification (Part 14)
- The right to erasure (also known as the 'right to be forgotten') (Part 15)
- The right to restrict processing (Part 16)
- The right to data portability (Part 17)
- The right to object (Part 18)
- Rights with respect to automated decision-making and profiling (Parts 19 and 20)

4 Lawful, fair and transparent data processing

4.1 The GDPR seeks to ensure that personal data is processed lawfully, fairly, and transparently, without adversely affecting the rights of the data subject. The GDPR states that processing of personal data shall be lawful if at least one of the following applies:

4.1.1 The data subject has given consent to the processing of their personal data for one or more specific purposes.

4.1.2 The processing is necessary for the performance of a contract to which the data subject is a party, or in order to take steps at the request of the data subject prior to entering into a contract with them.

4.1.3 The processing is necessary for compliance with a legal obligation to which the data controller is subject.

4.1.4 The processing is necessary to protect the vital interests of the data subject or of another natural person.

4.1.5 The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

4.1.6 The processing is necessary for the purposes of the legitimate interests pursued by the data controller or by a third party, except where such interests are overridden by the fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child.

4.2 If the personal data in question is "special category personal data" (sometimes referred to as "sensitive personal data") processing is prohibited, unless one, or more, of the following exemptions applies:

4.2.1 The data subject has given their explicit consent to the processing of such data for one or more specified purposes (unless UK law prohibits them from doing so).

4.2.2 The processing is necessary for the purpose of carrying out the obligations and exercising specific rights of the data controller or of the data subject in the field of employment, social security, and social protection law (insofar as it is authorised by UK Law).

4.2.3 The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent.

4.2.4 The data controller is a foundation, association, or other non-profit body with a political, philosophical, religious, or trade union aim, and the processing is carried out in the course of its legitimate activities, provided that the processing relates solely to the members or former members of that body or to persons who have regular contact with it in connection with its purposes and that the personal data is not disclosed outside the body without the consent of the data subjects.

4.2.5 The processing relates to personal data which is clearly made public by the data subject.

4.2.6 The processing is necessary for the conduct of legal claims or whenever courts are acting in their judicial capacity.

4.2.7 The processing is necessary for substantial public interest reasons, on the basis of UK law which shall be proportionate to the aim pursued, shall respect the essence of the right to data protection, and shall provide for suitable and specific measures to safeguard the fundamental rights and interests of the data subject.

4.2.8 The processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of an employee, for medical diagnosis, for the provision of health or social care or treatment, or the management of health or social care systems or services on the basis of EU or EU Member State law or pursuant to a contract with a health professional, subject to the conditions and safeguards referred to in Article 9(3) of the UK GDPR.

4.2.9 The processing is necessary for public interest reasons in the area of public health, for example, protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of EU or EU Member State law which providing for suitable and specific measures to safeguard the rights and freedoms of the data subject (in particular, professional secrecy).

4.2.10 The processing is necessary for archiving purposes in the public interest, scientific or historical research purposes, or statistical purposes in accordance with Article 89(1) of the GDPR based on EU or EU Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection, and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

4.3 Where special category personal data is processed the Trust shall have both a legal basis from Article 6 for using that personal data and at least one of the exemptions from Article 9(2) shall apply.

5 Specified, explicit and legitimate purposes

5.1 The Trust collects and processes the personal data set out in Part 21 of this Policy. This includes:

5.1.1 Personal data collected directly from data subjects; and

5.1.2 Personal data obtained from third parties.

5.2 The Trust only collects, processes, and holds personal data for the specific purposes set out in this Policy (or for other purposes expressly permitted by the GDPR).

5.3 Data subjects are kept informed at all times of the purpose or purposes for which the Trust uses their personal data. Please refer to Part 12 for more information on keeping data subjects informed.

6 Children's Data

We apply enhanced protections for pupils' data, especially for those under 13. Parental consent is required for certain processing activities.

7 Adequate, Relevant, and Limited Data Processing

The Trust will only collect and process personal data for and to the extent necessary for the specific purpose or purposes of which data subjects have been informed (or will be informed) as under Part 5, above.

8 Accuracy of data and keeping data up to date

8.1 The Trust shall take all reasonable steps to ensure that all personal data collected, processed, and held by it is kept accurate and up to date. This includes, but is not limited to, the rectification of personal data at the request of a data subject, as set out in Part 16, below.

8.2 The accuracy of personal data shall be checked when it is collected and at regular intervals thereafter. If any personal data is found to be inaccurate or out-of-date, all reasonable steps will be taken without delay to amend or erase that data, as appropriate.

9 Record of Processing Activities (ROPA) and Register of Information Assets (RIA)

9.1 The Trust shall maintain a ROPA based on a data mapping exercise. It shall include:

- the personal data processed by the Trust;
- a description of the categories of individuals and of personal data;
- the legal basis of that processing;
- the retention period;
- where the data is stored

9.2 The Trust shall maintain a RIA that records the assets, systems and applications used for processing or storing personal data across the Trust and in the schools.

9.3 The ROPA and RIA shall be reviewed at least once per year to ensure they remain accurate and up to date.

10 Data retention

10.1 The Trust shall not keep personal data for any longer than is necessary in light of the purpose or purposes for which that personal data was originally collected, held, and processed.

10.2 When personal data is no longer required, all reasonable steps will be taken to erase or otherwise dispose of it without delay.

10.3 For full details of the Trust's approach to data retention, including retention periods for specific personal data types held by the Trust, please refer to the TMET Data Retention Policy.

11 Secure Processing

The Trust shall ensure that all personal data collected, held and processed is kept secure and protected against unauthorised or unlawful processing and against accidental loss, destruction, or damage. Further details of the technical and organisational measures which shall be taken are provided in Parts 24 to 28 of this Policy.

12 Accountability and record keeping

12.1 The Data Protection Officer (DPO) is GDPR Sentry Limited.

12.2 The DPO shall be responsible for overseeing the implementation of this Policy and for monitoring compliance with this Policy, the Trust's other data protection-related policies, and with the GDPR and other applicable data protection legislation.

12.3 The Trust shall have a Data Protection Lead who shall be responsible for managing data protection across the Trust, with advice from the DPO where appropriate. This includes overseeing the implementation of the Trust data protection-related policies, liaising with the school Data Protection Leads and seeking advice and guidance from the DPO where appropriate. It also includes monitoring the dpo@tmet.uk email account.

12.4 Each school shall have a named Data Protection Lead who shall be responsible for overseeing the implementation of the Trust data protection-related policies in the school and liaising with the Trust Data Protection Lead.

12.5 The Trust shall keep written internal records of all personal data collection, holding, and processing, which shall incorporate the following information:

12.5.1 The name and details of the Trust, its Data Protection Officer, and any applicable third-party data processors.

12.5.2 The purposes for which the Trust collects, holds, and processes personal data.

12.5.3 Details of the categories of personal data collected, held, and processed by the Trust, and the categories of data subject to which that personal data relates.

12.5.4 Details of any transfers of personal data to non-EEA countries including all mechanisms and security safeguards.

12.5.5 Details of how long personal data will be retained by the Trust (please refer to the Trust's Data Retention Policy).

12.5.6 Detailed descriptions of all technical and organisational measures taken by the Trust to ensure the security of personal data.

13 Data protection impact assessments

13.1 The Trust shall carry out Data Protection Impact Assessments for any and all new projects and/or new uses of personal data which involve the use of new technologies and the processing involved is likely to result in a high risk to the rights and freedoms of data subjects under the GDPR.

13.2 Data Protection Impact Assessments shall be overseen by the Data Protection Officer and shall address the following:

- The type(s) of personal data that will be collected, held, and processed
- The purpose(s) for which personal data is to be used
- The Mead Educational Trust's objectives
- How personal data is to be used
- The parties (internal and/or external) who are to be consulted

- The necessity and proportionality of the data processing with respect to the purpose(s) for which it is being processed
- Risks posed to data subjects
- Risks posed both within and to the Trust
- Proposed measures to minimise and handle identified risks

14 Keeping data subjects informed

14.1 The Trust shall provide the information set out in Part 12.5 to every data subject:

14.1.1 Where personal data is collected directly from data subjects, those data subjects will be informed of its purpose at the time of collection; and

14.1.2 Where personal data is obtained from a third party, the relevant data subjects will be informed of its purpose:

a. if the personal data is used to communicate with the data subject, when the first communication is made; or

b. if the personal data is to be transferred to another party, before that transfer is made; or

c. as soon as reasonably possible and in any event not more than one month after the personal data is obtained.

14.2 The following information shall be provided:

14.2.1 Details of the Trust including, but not limited to, the identity of its Data Protection Officer.

14.2.2 The purpose(s) for which the personal data is being collected and will be processed (as detailed in Part 21 of this Policy) and the legal basis justifying that collection and processing.

14.2.3 Where applicable, the legitimate interests upon which the Trust is justifying its collection and processing of the personal data.

14.2.4 Where the personal data is not obtained directly from the data subject, the categories of personal data collected and processed.

14.2.5 Where the personal data is to be transferred to one or more third parties, details of those parties.

14.2.6 Where the personal data is to be transferred to a third party that is located outside of the European Economic Area (the "EEA"), details of that transfer, including but not limited to the safeguards in place (see Part 30 of this Policy for further details).

14.2.7 Details of data retention.

14.2.8 Details of the data subject's rights under the UK GDPR.

14.2.9 Details of the data subject's right to withdraw their consent to the Trust's processing of their personal data at any time.

14.2.10 Details of the data subject's right to complain to the Information Commissioner's Office (the "supervisory authority" under the GDPR).

14.2.11 Where applicable, details of any legal or contractual requirement or obligation necessitating the collection and processing of the personal data and details of any consequences of failing to provide it.

14.2.12 Details of any automated decision-making or profiling that will take place using the personal data, including information on how decisions will be made, the significance of those decisions, and any consequences.

15 Data subject access requests

15.1 Data subjects may make subject access requests ("SARs") at any time to find out more about the personal data which the Trust holds about them, what it is doing with that personal data, and why. They are encouraged to make these requests by contacting the school concerned or by emailing **dpo@tmet.uk.**

15.2 SARs must be "reasonable and proportionate". Where required, the Trust reserves the right to request clarification of requested data, in line with provisions set out in the Data (Use and Access) Act 2025 (DUAA).

15.3 Responses to SARs shall normally be made within one calendar month of receipt, however this may be extended by up to two months if the SAR is complex and/or numerous requests are made. If such additional time is required, the data subject shall be informed.

15.4 Responses to SARs shall be dependent upon the terms of the GDPR, the Data Protection Act (2018), The Data (Use and Access) Act, and associated ICO guidance.

15.5 The Trust is under no obligation to resend data already accessible to the requester.

15.6 The Trust does not charge a fee for the handling of normal SARs. The Trust reserves the right to charge reasonable fees for additional copies of information that has already been supplied to a data subject, and for requests that are manifestly unfounded or excessive, particularly where such requests are repetitive.

15.7 The Trust has defined a process for handling SARs and other data subject requests. This process is found the TMET Subject Access Request Policy.

16 Rectification of personal data

16.1 Data subjects may have the right to require the Trust to rectify any of their personal data that is inaccurate or incomplete.

16.2 Where such rectification is possible, the Trust shall rectify the personal data in question, and inform the data subject of that rectification, within one month of the data subject informing the Trust of the issue. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

16.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of any rectification that must be made to that personal data.

17 Erasure of personal data

17.1 Data subjects have the right to request that the Trust erases the personal data it holds about

them in the following circumstances:

17.1.1 It is no longer necessary for the Trust to hold that personal data with respect to the purpose(s) for which it was originally collected or processed.

17.1.2 The data subject wishes to withdraw their consent to the Trust holding and processing their personal data.

17.1.3 The data subject objects to the Trust holding and processing their personal data (and there is no overriding legitimate interest to allow the Trust to continue doing so) (see Part 18 of this Policy for further details concerning the right to object).

17.1.4 The personal data has been processed unlawfully.

17.1.5 The personal data needs to be erased in order for the Trust to comply with a particular legal obligation.

17.1.6 The personal data is being held and processed for the purpose of providing information society services to a child.

17.2 Unless the Trust has reasonable grounds to refuse to erase personal data, all requests for erasure shall be complied with, and the data subject informed of the erasure, within one month of receipt of the data subject's request. The period can be extended by up to two months in the case of complex requests. If such additional time is required, the data subject shall be informed.

17.3 In the event that any personal data that is to be erased in response to a data subject's request has been disclosed to third parties, those parties shall be informed of the erasure (unless it is impossible or would require disproportionate effort to do so).

18 Restriction of personal data processing

18.1 Data subjects may request that the Trust restricts processing the personal data it holds about them. If a data subject makes such a request, The Mead Educational Trust shall in so far as is possible ensure that the personal data is only stored and not processed in any other fashion.

18.2 If the Trust is required to process the data for statutory purposes or for reasons of legal compliance, then the Trust shall inform the Data Subject that this processing is expected to take place. If possible, this notice will be provided prior to processing.

18.3 In the event that any affected personal data has been disclosed to third parties, those parties shall be informed of the applicable restrictions on processing it (unless it is impossible or would require disproportionate effort to do so).

19 Data portability requests

19.1 The Trust processes personal data using automated means. Such processing is carried out by, inter alia, our management information system, our human resources system and our catering management system.

19.2 Where data subjects have given their consent to the Trust to process their personal data in such a manner, or the processing is otherwise required for the performance of a contract between the Trust and the data subject, data subjects have the right, under the UK GDPR, to receive a copy of their personal data and to use it for other purposes (namely transmitting it to other data controllers).

19.3 Where technically feasible, if requested by a data subject, personal data shall be sent directly to the required data controller.

19.4 All requests for copies of personal data shall be complied with within one month of the data subject's request. The period can be extended by up to two months in the case of complex or numerous requests. If such additional time is required, the data subject shall be informed.

20 Objections to personal data processing

20.1 Data subjects have the right to object to the Trust processing their personal data where such processing is based on the performance of a public task or the legitimate interests of the Trust which include may direct marketing and profiling.

20.2 Where a data subject objects to the Trust processing any such personal data, the Trust shall act as though the data subject has submitted a request for restriction of processing for the specified personal data

20.3 The Trust shall be responsible for reviewing the processing the data subject has objected to so as to provide a compelling demonstration of the Trust's grounds for the processing that override the data subject's interests, rights, and freedoms, or that the processing is necessary for the conduct of legal claims.

20.4 Where a data subject objects to the Trust processing their personal data for direct marketing purposes, the Trust shall cease such processing immediately.

20.5 Where a data subject objects to the Trust processing their personal data for scientific and/or historical research and statistics purposes, the data subject may object on grounds relating to his or her particular situation. The Trust is not required to comply if the research is necessary for the performance of a task carried out for reasons of public interest.

21 Automated decision making

21.1 Data subjects have the right not to be subject to a decision based on automated processing of their personal data, including profiling, where that decision has a legal effect or significantly affects them.

21.2 The Trust may use such processing if the decision:

21.2.1 is necessary for entering into, or performance of, a contract between the data subject and a data controller;

21.2.2 is authorised by Union or Member State law to which the controller is subject and which also lays down suitable measures to safeguard the data subject's rights and freedoms and legitimate interests; or

21.2.3 is based on the data subject's explicit consent.

21.3 Where such decisions have a legal (or similarly significant effect) on data subjects, those data subjects have the right to challenge to such decisions under the UK GDPR, requesting human intervention, expressing their own point of view, and obtaining an explanation of the decision from the Trust.

21.4 Such decisions should not concern a child (natural persons under the age of 18) unless there is a compelling, demonstrated and documented reason for doing so.

22 Profiling

22.1 The Trust uses personal data for profiling purposes. These purposes relate to helping students maximise achievement and attendance.

22.2 When personal data is used for profiling purposes, the following shall apply:

22.2.1 Clear information explaining the profiling shall be provided to data subjects, including the significance and likely consequences of the profiling.

22.2.2 Appropriate mathematical or statistical procedures shall be used.

22.2.3 Technical and organisational measures shall be implemented to minimise the risk of errors. If errors occur, such measures must enable them to be easily corrected.

22.2.4 All personal data processed for profiling purposes shall be secured in order to prevent discriminatory effects arising out of profiling (see Parts 22 to 26 of this Policy for more details on data security).

23 Personal data collected, held and processed

The Trust uses a wide range of personal data across many processes. More detail can be found in our Privacy Notices. Our Data Protection Officer can provide a list of the categories of personal data we process.

24 Data security – Transferring personal data and communications

24.1 Personal data may be transmitted over secure networks only; transmission over unsecured networks is not permitted in any circumstances.

24.2 The Trust will ensure that, where special category personal data or other sensitive information is sent in the post, it shall be possible to demonstrate that it was delivered.

24.3 Where personal data is to be sent by facsimile transmission the recipient should be informed in advance of the transmission and should be waiting by the fax machine to receive the data.

24.4 Where special category personal data or other sensitive information is to be sent by e-mail the email will either be sent using a suitable encryption method or the data will be sent in an attached, encrypted document and not in the body of the e-mail.

24.5 Where personal data is to be transferred in removal storage devices, these devices shall be encrypted. The use of unencrypted removable storage devices is prohibited by the Trust.

25 Data security – Storage

The Trust shall ensure that the following measures are taken with respect to the storage of personal data.

25.1 All electronic copies of personal data should be stored securely using passwords, user access rights and, where appropriate, data encryption.

25.2 All hard copies of personal data, along with any electronic copies stored on physical, removable media, should be stored securely in a locked box, drawer, cabinet, or similar.

25.3 All personal data relating to the operations of the Trust, stored electronically, should be

backed up on a regular basis.

25.4 Where any member of staff stores personal data on a mobile device (whether that be computer, tablet, phone or any other device) then that member of staff must abide by the Acceptable Use Policy of the Trust. The member of staff shall also ensure that they can provide a secure environment for that device to be used to minimise any risk to the confidentiality or integrity of the information.

26 Data security – Disposal

When any personal data is to be erased or otherwise disposed of for any reason (including where copies have been made and are no longer needed), it should be securely deleted and disposed of. For further information on the deletion and disposal of personal data, please refer to the Trust's Data Retention Policy.

27 Data security – Use of personal data

The Trust shall ensure that the following measures are taken with respect to the use of personal data.

27.1 No personal data may be shared informally and, if an employee, agent, sub-contractor, or other party working on behalf of the Trust requires access to any personal data that they do not already have access to, such access should be formally requested.

27.2 No personal data may be transferred to any employees, agents, contractors, or other parties, whether such parties are working on behalf of the Trust or not, without the initial authorisation of a member of the Trust HR Team.

27.3 Personal data must always be handled with care and should not be left unattended or on view to unauthorised employees, agents, sub-contractors or other parties at any time.

27.4 If personal data is being viewed on a computer screen and the computer in question is to be left unattended for any period of time, the user must lock the computer and screen before leaving it.

27.5 Where personal data held by the Trust is used for marketing purposes, it shall be the responsibility of the individual using that data to ensure that the appropriate consent is obtained and that no data subjects have opted out, whether directly or via a third-party service such as the TPS.

28 Data security – IT security

Full details of the Trust's IT security requirements and procedures can be found in the IT policies. The Trust shall ensure that, inter alia, the following measures are taken with respect to IT and information security:

28.1 The Trust requires that any passwords used to access personal data shall have a minimum of 9 characters, composed of a mixture of upper- and lower-case characters, numbers and symbols. Passwords are not expected to be changed upon a regular basis, but users will be expected to change their password if instructed by the Trust.

28.2 Under no circumstances should any passwords be written down or shared between any employees, agents, contractors, or other parties working on behalf of the Trust, irrespective of seniority or department. If a password is forgotten, it must be reset using

the applicable method. IT staff do not have access to passwords.

28.3 All software (including, but not limited to, applications and operating systems) shall be kept up to date. The Trust's IT staff shall be responsible for installing any and all security-related updates as soon as reasonably and practically possible, unless there are valid technical reasons not to do so.

28.4 No software may be installed on any Trust-owned computer or device without the prior approval of the Head of IT Services.

28.5 Where members of staff or other users use online applications that require the use of personal data, the use of that application must be signed off by the Head of IT Services.

29 Organisational measures

The Trust shall ensure that the following measures are taken with respect to the collection, holding, and processing of personal data.

29.1 All employees, agents, contractors, or other parties working on behalf of the Trust shall be made fully aware of both their individual responsibilities and the Trust's responsibilities under the UK GDPR and under this Policy, and shall have free access to a copy of this Policy.

29.2 Only employees, agents, sub-contractors, or other parties working on behalf of the Trust that need access to, and use of, personal data in order to carry out their assigned duties correctly shall have access to personal data held by the Trust.

29.3 All employees, agents, contractors, or other parties working on behalf of the Trust handling personal data will be appropriately trained to do so.

29.4 All employees, agents, contractors, or other parties working on behalf of the Trust handling personal data will be appropriately supervised.

29.5 All employees, agents, contractors, or other parties working on behalf of the Trust handling personal data shall be required and encouraged to exercise care, caution, and discretion when discussing work-related matters that relate to personal data, whether in the workplace or otherwise.

29.6 Methods of collecting, holding, and processing personal data shall be regularly evaluated and reviewed.

29.7 All personal data held by the Trust shall be reviewed periodically, as set out in the Trust's Data Retention Policy.

29.8 The performance of those employees, agents, contractors, or other parties working on behalf of the Trust handling personal data shall be regularly evaluated and reviewed.

29.9 The contravention of these rules will be treated as a disciplinary matter.

29.10 All employees, agents, contractors, or other parties working on behalf of the Trust handling personal data will be bound to do so in accordance with the principles of the UK GDPR and this Policy by contract.

29.11 All agents, contractors, or other parties working on behalf of the Trust handling personal data must ensure that any and all of their employees who are involved in the processing of personal data are held to the same conditions as those relevant employees of the Trust arising out of this Policy and the UK GDPR.

29.12 Where any agent, contractor or other party working on behalf of the Trust handling personal data fails in their obligations under this Policy that party shall indemnify and hold

harmless the Trust against any costs, liability, damages, loss, claims or proceedings which may arise out of that failure.

30 Transferring personal data to a country out of the EEA

30.1 The Trust may from time to time transfer ('transfer' includes making available remotely) personal data to countries outside of the EEA.

30.2 The transfer of personal data to a country outside of the EEA shall take place only if one or more of the following applies:

30.2.1 The transfer is to a country, territory, or one or more specific sectors in that country (or an international organisation), that the European Commission has determined ensures an adequate level of protection for personal data:

30.2.2 The transfer is to a country (or international organisation) which provides appropriate safeguards in the form of a legally binding agreement between public authorities or bodies; binding corporate rules; standard data protection clauses adopted by the European Commission; compliance with an approved code of conduct approved by a supervisory authority (e.g. the Information Commissioner's Office); certification under an approved certification mechanism (as provided for in the UK GDPR); contractual clauses agreed and authorised by the competent supervisory authority; or provisions inserted into administrative arrangements between public authorities or bodies authorised by the competent supervisory authority;

30.2.3 The transfer is made with the informed consent of the relevant data subject(s):

30.2.4 The transfer is necessary for the performance of a contract between the data subject and the Mead Educational Trust (or for pre-contractual steps taken at the request of the data subject):

30.2.5 The transfer is necessary for important public interest reasons:

30.2.6 The transfer is necessary for the conduct of legal claims:

30.2.7 The transfer is necessary to protect the vital interests of the data subject or other individuals where the data subject is physically or legally unable to give their consent; or

30.2.8 The transfer is made from a register that, under UK or EU law, is intended to provide information to the public and which is open for access by the public in general or otherwise to those who are able to show a legitimate interest in accessing the register.

31 Data breach notification

31.1 All personal data breaches must be reported immediately to the Trust's Data Protection Officer by logging it on GDPR Sentry.

31.2 If a personal data breach occurs and that breach is likely to result in a risk to the rights and freedoms of data subjects (e.g. financial loss, breach of confidentiality, discrimination, reputational damage, or other significant social or economic damage), the Data Protection

Officer must ensure that the Information Commissioner's Office (ICO) is informed of the breach without delay, and in any event, within 72 hours after having become aware of it.

31.3 In the event that a personal data breach is likely to result in a high risk (that is, a higher risk than that described under Part 30.2) to the rights and freedoms of data subjects, the Data Protection Officer must ensure that all affected data subjects are informed of the breach directly and without undue delay.

31.4 Data breach notifications shall include, as a minimum, the following information:

- The categories and number of data subjects concerned
- The categories and number of personal data records concerned
- The name and contact details of the Trust's data protection officer (or other contact point where more information can be obtained)
- The likely consequences of the breach
- Details of the measures taken, or proposed to be taken, by the Trust to address the breach including, where appropriate, measures to mitigate its possible adverse effects.

31.5 The ICO could impose a fine for failure to report a data breach or for the breach itself. Fines may be up to 20 million euros or 4% of annual turnover, whichever is the greater.

31.6 The **TMET Data Breach Policy** has details on managing personal data breaches.

32 Complaints

Complaints related to data protection are addressed as detailed in Appendix A.

33 Monitoring Data Protection Compliance

33.1 GDPR Sentry Limited shall conduct data protection audits of the Trust schools and central office at least once every two years.

33.2 The Trust and School Data Protection Leads shall conduct spot checks on data security and retention on a regular basis.

34 Data Protection Officer and Data Protection Leads

34.1 The Data Protection Officer for The Mead Educational Trust is GDPR Sentry Limited.

34.2 The Trust has a Trust Data Protection Lead and each school has a Data Protection Lead.

34.3 The dpo@tmet.uk email account is monitored by the Trust Data Protection Lead.

35 Associated Policies

- TMET Data Retention Policy
- TMET Subject Access Request Policy
- TMET Data Breach Policy

APPENDIX A: Data Protection Complaint Handling Procedure

1. Purpose and Scope

This procedure outlines how The Mead Educational Trust handles complaints related to the data protection, in accordance with UK data protection law. It applies to all individuals who believe we have infringed their rights under the UK General Data Protection Regulation (UK GDPR) and/or the Data Protection Act 2018 (as amended).

Complaints may include, but are not limited to:

- Concerns regarding information provided in a Subject Access Request
- Concerns around data security, for example how we responded to a data breach
- Concerns with the way that we're processing or accessing data
- Being unhappy with the accuracy of the data that we hold
- The retention of personal data

2. How to Lodge a Complaint

If you have concerns about how we collect, use, store, or share your personal data, you can lodge a complaint by contacting the Trust Data Protection Lead via dpo@tmet.uk

Please include:

- Your full name and contact details
- A clear description of your complaint
- The data or processing activity involved (if known)
- Any evidence or relevant correspondence
- The outcome or remedy you are seeking (if applicable)

3. What Happens Next

Once your complaint is received:

- **Acknowledgement -** We will acknowledge your complaint **within 30 calendar days** of receipt.
- **Investigation -** We will review your complaint and may contact you for further information. The investigation will be handled by our **Trust Data Protection Lead** or a designated privacy lead.
- **Response -** We aim to respond **without undue delay**, and in most cases, within **one calendar month** of receipt. If the matter is complex, we may extend this by up to two further months—but we will inform you and explain why.

4. Escalation: Your Rights

If you are not satisfied with our response, or you believe we have not handled your complaint appropriately, you have the right to escalate the matter to the **Information Commissioner's Office (ICO)**:

Website: https://ico.org.uk/make-a-complaint/
Phone: 0303 123 1113
Post:
Information Commissioner's Office
Wycliffe House

Water Lane
Wilmslow
Cheshire
SK9 5AF

Under the **Data (Use and Access) Act 2025**, the ICO may require that you first submit your complaint to us before they investigate.

5. Record Keeping

All complaints and responses will be logged and retained for 6 years, in accordance with our privacy and compliance obligations.