Bath and Wells Diocesan Academies Trust

Data Protection Policy

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Current date approved	**January 2026**
Next review date	**January 2027**
Approved by	**Full Trust Board**
Policy Owner	**Operations – ICT**
Policy Location	**SharePoint, Website**
Target Audience	**All staff**
Document History	
Version 1 – Date of Review	**January 2026**

Context

The Bath & Wells Diocesan Academies Trust (the Trust) is a dynamic learning community committed to providing a safe and supportive environment where pupils and staff can learn, thrive, and flourish. This policy supports that vision by promoting responsible, secure, and ethical use of digital technology across all Trust schools. Trust policies are a formal way of documenting the procedures and values of the Trust and are designed to provide an instant picture of the principles of the Trust. They form an important framework that will ensure consistency in applying the agreed values and principles across all elements the Trust.

The Trust is committed to ensuring that all personal data collected is processed in accordance with all relevant data protection laws including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

The Bath and Wells Multi Academy Trust is registered as a data controller with the Information Commissioner.

The details of the Bath & Wells Multi Academy Trust's Data Protection Officer (DPO) can be found at Section 3 of the Trust Data Protection – Procedures, Roles and Responsibilities document.

Purpose

The Board of Trustees wishes to be proactive and organised in its approach to data protection and this policy is a fundamental part of the Trust's approach to data protection compliance.

Trustees believe that effective data protection practices will ensure that the Trust and the individuals within it will collect, store and use personal data fairly, safely and lawfully. The purpose of this policy is to ensure the statutory requirements of data protection (and associated legislation/guidance) are met.

The UK GDPR sets out 7 key principles that guide organisations with the processing of personal data:

- **Lawfulness, fairness and transparency** – Personal data must be collected legally and processed in a way that is reasonable, clear and honest
- **Purpose limitation** – Personal data must only be collected for specified, legitimate purposes and not processed for a different purpose.
- **Data minimisation** – This includes ensuring that only the minimal amount of personal data is processed to achieve the organisation's purposes.
- **Accuracy** – Personal data must be accurate and kept up to date.
- **Storage limitation** – Personal data must not be kept for longer than necessary.
- **Integrity and confidentiality (security)** – The security of personal data must be maintained to minimise the risk of loss, destruction, or damage.
- **Accountability** – This includes taking responsibility for how personal data is processed and ensuring that compliance can be demonstrated.

Trustees support these principles, and they sit at the heart of the Trust's approach to processing personal data.

Scope

This policy applies to anyone who has access to data and/or is a user of Trust ICT systems, both within and outside of the Trust, including staff, pupils, volunteers (including Trustees and members of Trust Local Committees), visitors, contractors, and other community users.

This policy is also intended to serve as the Appropriate Policy Document for the processing of special category data.

This policy applies to all personal data for which the Trust is the data controller, regardless of whether it is in paper or electronic format.

Trust Alignment

This policy is linked to Pledge 2 of the Trust's Strategic Plan and the strategic priority: *Our Trust will remove barriers, challenge injustice and celebrate diversity to improve Education in every community we serve.*

Other Related Policies

This policy should be read in conjunction with the following national & Trust policies/procedures:

National Legislation/guidance:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act (DPA) 2018
- The Freedom of Information Act 2000
- The Protection of Freedoms Act 2012
- Guidance published by the Information Commissioner's Office
- Data Protection in Schools published by the Department for Education

Trust Policies and Procedures:

- Data Protection – Procedures, Roles and Responsibilities
- Trust ICT Security Policy
- Online Safety Policy
- Safeguarding Policy
- Records Management Procedure and retention schedule
- Data Breach Procedure and reporting form
- Privacy Notices
- Acceptable Use for Staff, Governors and Volunteers
- Acceptable Use for Pupils & Parents (Trust Template for Schools to edit)
- Consent / Permissions Form (e.g. visits, data sharing, image use etc)
- Admissions Forms

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Monitoring

This policy is owned by the Director of Operations. It will be subject to review by the Board of Trustees every 3 years but may be reviewed at any time due to changes in statutory responsibilities and/or guidance.