Tarbiyyah Global Academy
Part of the Tarbiyyah Education Trust · globalacademy.tarbiyyah.co.uk · globalacademy@tarbiyyah.co.uk · 020 3719 8697

DATA PROTECTION POLICY

Protecting personal information as an amanah

ACADEMIC YEAR 2026 – 2027

Policy name	Data Protection Policy 2026–2027
Applies to	All pupils, parents, staff, trustees and volunteers of Tarbiyyah Global Academy
Policy owner	Data Protection Officer
Approved by	Ustadh Abu Zayn Haneef Sandhar, Headteacher
Agreed with	The Chair of Trustees, Tarbiyyah Education Trust
Date of issue	1 September 2026 (version 1.2)
Next review due by	31 August 2027
Basis	Updated from the Tarbiyyah Global Academy Data Protection Policy draft (September 2026); platform references updated to the Academy's current systems
Read alongside	Recording of Live Lessons and Use of Images Policy; Online Safety and Acceptable Use Policy; Child Protection and Safeguarding Policy; Admissions Policy; the privacy notice on the Academy website
Availability	Published on the Academy website and Parent Portal. Available in large print or another accessible format on request.

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1. Vision and Ethos

The personal data of our pupils, families and staff is an amanah — a trust. In a fully online school, lessons, communication, pupil work and records all pass through digital systems, so protecting data is both a legal duty and a daily responsibility for everyone.

2. Legal Framework

This policy complies with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations. The Academy's processing of personal data is carried out under the Tarbiyyah Education Trust's arrangements with the Information Commissioner's Office (ICO); confirmation of the registration is available from the Headteacher on request. Where pupils live in other countries, the Academy also has regard to relevant local data protection laws.

3. The Data Protection Principles

Personal data is:

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. kept no longer than necessary;
6. processed securely.

The Academy is responsible for, and able to demonstrate, compliance with these principles (accountability).

4. Roles and Responsibilities

Role	Responsibility
Trustees	Overall accountability for compliance
Data Protection Officer (DPO)	Advises on and monitors compliance, handles requests and breaches, liaises with the ICO. The DPO role is held by a suitably trained person with direct access to the trustees; the Trust may appoint an external DPO service
Digital Lead	Security of Academy systems, account management, access control and secure deletion; reviews the audit logs of Academy systems every month and whenever a concern is raised, and reports any suspected breach to the DPO the same day
All staff	Handle data in line with this policy and complete the Academy's data protection training, with its short quiz, at induction and every year

5. What Data We Hold and Why

The Academy holds personal data about pupils (for example name, date of birth, address, country of residence, attendance, assessment, SEND and medical information, safeguarding records, lesson recordings), parents (contact details, fee and payment records), staff and applicants. The purposes and lawful bases are set out in the privacy notice on the Academy website. Special category data (such as health, religion or SEND information) is processed only where an Article 9 condition applies, such as substantial public interest for safeguarding.

6. Academy Systems

System	Use
Microsoft 365 / the Academy's live-lesson platform (currently Microsoft Teams), joined from the Student Portal	Live lessons, recordings, email
Academy Parent and Student Portals (hosted on Supabase, London region)	Admissions calls, parent and student accounts, bookings, merits, announcements, documents, assignments, class notebooks
Transactional email service (Resend)	Booking confirmations, reminders and portal sign-in codes
Approved learning subscriptions	Only where a data processing agreement is in place

Each processor is covered by a written data processing agreement, and a data protection impact assessment (DPIA) is completed before any new system that processes pupils' data is introduced. A DPIA is completed for the Parent and Student Portals before they go live.

7. Security and Access

- Access to data is limited by role. Safeguarding and SEND records are accessible only to authorised staff.
- Staff accounts use single sign-on and multi-factor authentication. Access can be revoked immediately if a device is lost, a staff member leaves, or an account is compromised.
- Staff may use personal devices only through Academy accounts, never downloading pupil data to personal storage.
- Paper documents received are scanned into Academy systems and securely shredded.

8. International Transfers

Many families live outside the UK, and some staff may work from abroad. Personal data is stored in UK or EU data centres where possible. Where data is transferred to or accessed from a country without UK adequacy regulations, the Academy uses appropriate safeguards (such as the International Data Transfer Agreement) and a transfer risk assessment.

9. Individuals' Rights

Individuals have the right to be informed, to access their data, to rectification, to erasure (in some circumstances), to restrict or object to processing, and to data portability. Requests, including subject access requests, are sent to the DPO and answered within one calendar month (extendable in limited circumstances). Pupils aged around 12 and over are generally considered able to make their own requests. Information about other people, including other pupils in lesson recordings, is redacted or withheld as the law requires.

10. Data Breaches

Any suspected breach — for example a lost device, an email sent to the wrong person, or an unauthorised person in a lesson — must be reported to the DPO immediately. The DPO assesses the

risk and, where required, reports to the ICO within 72 hours and informs affected individuals without undue delay. Every breach is recorded and reviewed.

11. Photographs, Video and Recordings

Lesson recordings are governed by the Recording of Live Lessons and Use of Images Policy. Photographs and video for publicity require specific, written consent, which can be withdrawn at any time.

12. Retention Schedule

Record	Retention	Action
Routine live lesson recordings	1 academic year, unless needed for an open matter	Secure deletion
Admissions record	3 years from the date of the last entry	Secure deletion
Attendance registers	3 years from the date of entry	Secure deletion
Main pupil record and internal results	Until the pupil's 25th birthday	Secure deletion
SEND files and EHCP records	Until the pupil's 31st birthday	Secure deletion
Child protection files	Until the pupil's 25th birthday, then review; longer if litigation or an inquiry requires	Review, then secure deletion
Allegations against staff (substantiated or not false/malicious)	Until normal retirement age or 10 years, whichever is longer	Secure deletion
Staff personnel files	6 years after employment ends	Secure deletion
Unsuccessful job applications	6 months after the decision	Secure deletion
Financial records, invoices and payroll	6 years from the end of the financial year	Secure deletion
Unsuccessful admissions applications	1 year after the decision	Secure deletion

13. Training and Review

All staff receive data protection training at induction and annually. This policy is reviewed annually by the DPO and approved by the Headteacher and agreed with the Chair of Trustees.

Approved by: Ustadh Abu Zayn Haneef Sandhar, Headteacher · Next review due: 31 August 2027 · Tarbiyyah Global Academy · A specialist education, rooted in faith