

POLICY TITLE	Data Protection Framework Overview
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## REVIEWS COMPLETED

Managing Director	Vanessa Leach		01/08/2024
Finance Director	Phil Davies	<i>Phill Davies</i>	01/08/2024

## DETAILS OF POLICY UPDATES

DATE	DETAILS
01/05/2024	First draft issued by Evalian Ltd.
01/08/2024	Final version agreed with Evalian Ltd.

## Document Release:

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## 1. Introduction

- 1.1. This Data Protection Framework Overview ("Framework") sets out the structure that supports the decision-making processes that Tute Education Limited ("Tute", "we", "us", "our") follow in relation to how we collect, store, create, share, destroy and otherwise process Personal Data.
- 1.2. By adhering to this Framework, we will ensure we handle Personal Data in accordance with the UK General Data Protection Regulation and the Data Protection Act 2018, (together referred to as the "Data Protection Law") and the guidance issued by the Information Commissioner's Office ("ICO").

Please note, the definitions for any undefined terms in this policy can be found in our Data Protection Policy and are applicable to this policy.

## 2. Purpose

- 2.1. The purpose of this document is to explain our Data Protection Framework. The Framework consists of:

- Data protection legislation;
- Guidance from the ICO;
- Roles and responsibilities;
- Clear reporting lines;

Data protection Steering Group;  
Policies and procedures; and  
Training.

2.2. By implementing this Framework, we will be able to demonstrate that we take data protection seriously and are committed to the fair and lawful handling of Personal Data.

### 3. Scope

3.1. This Framework applies to all Personal Data processed by Tute or on our behalf, such as data stored in cloud systems. This includes Personal Data in structured records such as databases, in emails, in audio and video recordings and includes Personal Data we generate such as through access control systems and in personnel files, as well as Personal Data provided to us.

3.2. This Framework applies to all employees, workers, consultants, contractors and interns (“employees”, “you”, “your”). Your compliance with this Framework is mandatory. Any breach of this Framework may result in disciplinary action.

3.3. Tute Education Limited is registered as a Controller in the UK with the ICO, registration number ZA097670.

### 4. Roles and Responsibilities

#### 4.1. Employees

Everyone working for or on behalf of Tute has a responsibility to adhere to the Data Protection Law and:

- Read and comply with all data protection related policies and procedures;
- Undertake data protection awareness training upon induction and refreshed annually;

- Report Personal Data breaches as soon as they become aware of them, in accordance with our Personal Data Breach Procedure; and
- Consult the Data Protection Manager on any data protection matters which are a cause for concern.

#### 4.2. Line Managers

Line Managers have the same responsibilities as all employees, but they also have a responsibility in relation to their teams. Line Managers should be particularly mindful of the requirement to consult the Data Protection Manager before implementing any new systems or procedures for processing Personal Data and consider whether a Data Protection Impact Assessment (“DPIA”) needs to be carried out.

#### 4.3. Data Protection Manager

The Data Protection Manager has overall responsibility for day-to-day data protection issues. They are responsible for implementing and enforcing the data protection policies and procedures.

#### 4.4 Data Protection Officer (“DPO”)

Tute has appointed the following organisation as our DPO:

Evalian Limited  
West Lodge  
Leylands Business Park  
Colden Common  
Hampshire  
Southampton  
SO21 1TH

Phone: 03330 500 111

The Evalian office hours are 9am to 5pm. In the event that you need to report a Personal Data Breach outside these hours, please send an email to [dpo@evalian.co.uk](mailto:dpo@evalian.co.uk).

4.5. The DPO is responsible for monitoring our compliance with the Data Protection Law, providing data protection advice and assistance, and co-operating with and being a contact point for the ICO.

## 5. Security

5.1. We have appropriate technical and organisational measures to protect Personal Data. In terms of organisational measures, we ensure that:

- everyone working for and on behalf of Tute undergo data protection awareness training upon induction, refreshed annually; and
- robust policies and procedures in relation to protecting Personal Data are implemented.

5.2. In terms of technical measures, we ensure that appropriate steps are taken to protect Personal Data, such as the use of firewalls, anti-malware, the principle of least privilege access and suitable safeguards for international transfers (where applicable).

5.3. The above lists are not exhaustive. Further details can be found in our Information Security Policy.

## 6. Policies and Procedures

6.1. We have implemented the following policies and procedures in support of our Data Protection Framework:

- Data Protection Policy
- Personal Data Retention Policy
- Data Subject Rights Procedure
- Data Protection by Design and by Default Policy
- Data Protection Impact Assessment Procedure
- Personal Data Breach Procedure

- Data Sharing Policy
- Email Retention Policy
- Working from Home Guide
- Information Security Policy

## 7. Sharing

7.1. We recognise the importance of ensuring that Personal Data is not disclosed to any third parties unless it is fair, lawful, justified, proportionate and necessary to do so. The ICO have issued a Data Sharing Code of Practice and we are committed to following it, ensuring that data sharing is restricted to limited situations in which certain criteria are satisfied. We have implemented a Data Sharing Policy and ensure that anyone working for or on behalf of us adheres to it.

## 8. Data Breaches

8.1. We recognise that Personal Data breaches may occur from time to time and, as such, it is important to have procedures in place to address such events.

8.2. We have implemented a Personal Data Breach Procedure which sets out the steps to be followed when a Personal Data breach is discovered. We have also implemented a Personal Data Breach Assessment Template which assists us in identifying the level of risk to the individuals involved and whether or not the ICO and the Data Subjects need to be notified.

8.3. We encourage a culture of reporting Personal Data breaches immediately so that remedial action can be taken promptly in the hope of minimising the risks to Data Subjects.

## 9. Implementation & Framework Management

9.1 This Framework shall be deemed effective as of 01.08.2024. No part of this Framework shall have retroactive effect and shall thus apply only to matters occurring on or after this date.

9.2 This Framework will be reviewed annually by the Data Protection Manager and the Data Protection Officer or following any significant Personal Data breach