THE MINDSET MISSION TEAM® • *Inspiring Growth, One Mind at a Time*

Privacy Notice

How we collect, use, store and share personal information across MMT's services

Controller	Version	Effective	Review
Stu Smith trading as The Mindset Mission Team®	2.1	2 September 2026	September 2027, then at least annually

Our commitment
MMT handles personal information transparently, proportionately and securely. Children's best interests and safeguarding needs are central to our decisions. This notice applies to children and young people, parents/carers, school and partner staff, customers, website users, workers, associates and other people who interact with MMT.

1. Who we are and how to contact us

The data controller is Stu Smith, trading as The Mindset Mission Team® (MMT). This means that, unless another organisation controls the processing as explained below, MMT decides why and how personal information is used.

Data-protection contact	Stu Smith, Founder & Programmes Director
Email	stu@themindsetmissionteam.co.uk
Telephone	07551 149 196
Website	www.themindsetmissionteam.co.uk
Postal correspondence	Please email MMT to request the current business correspondence address.

2. A short explanation for children and young people

In plain language
MMT may need some information about you so that sessions are properly arranged and safe. We only ask for information we reasonably need. We keep it secure and do not sell it. We usually keep mentoring conversations private, but we cannot keep information secret if we think you or somebody else may be unsafe. In that situation, we may tell an appropriate adult or safeguarding service so that help can be provided. You can ask what information we hold about you and ask us to correct something that is wrong.

3. When this notice applies

This notice covers personal information used in connection with:

- school workshops, programmes, assemblies and longer-term interventions;
- privately arranged and school-commissioned one-to-one mentoring, both in person and online;
- holiday, community and off-site provision, including Mission: Unstoppable;
- Staff Training & CPD, INSET and twilight sessions;
- published journals, books, downloadable resources and online purchases;
- enquiries, bookings, contracts, invoices, payments, feedback, complaints and referrals;
- the MMT website, contact forms, mailing lists, analytics and social-media engagement;
- recruitment, safer engagement, DBS-related checks, staff, associates, contractors and volunteers; and
- safeguarding concerns, incidents, allegations, referrals and related records.

4. Our role when a school or organisation commissions MMT

A school, local authority or other commissioning organisation will normally be the controller for pupil information it collects and decides to share with MMT. MMT may act as its processor for activities carried out only on its documented instructions. The organisation's own privacy notice will apply to that processing.

MMT may also act as an independent controller for information it must use for its own service administration, professional records, legal obligations, insurance, complaints and safeguarding decisions. Where roles need clarification, they will be addressed in the commissioning or data-processing arrangements.

5. Personal information we may collect

Depending on the service and relationship, MMT may collect:

- **Identity and contact information:** names, preferred names, dates of birth, age, pronouns where voluntarily provided, school/year group, addresses, email addresses and telephone numbers.
- **Parent/carer and emergency information:** relationship, parental responsibility or authority, emergency contacts, responsible-adult availability, collection arrangements and service addresses.
- **Service information:** enquiries, bookings, consent, contracts, attendance, start/finish times, agreed venues/platforms, goals, feedback, participation, certificates, practical actions and proportionate session notes.
- **Health, SEND and accessibility information:** allergies, medical conditions, relevant medication information, disability, communication, mobility, sensory needs, reasonable adjustments and emergency instructions.
- **Safeguarding information:** concerns, disclosures, observations, exact words, incidents, allegations, advice, decisions, referrals, information sharing and actions taken.
- **School and professional information:** staff names, roles, contact details, DSL details and relevant approved information from schools, commissioners or professionals.
- **Online-session information:** approved platform/account, current location or service address, connection-failure arrangements and significant technical or safety incidents. MMT does not routinely record online sessions.
- **Transaction and business information:** orders, delivery details, invoices, payment status, refunds and accounting records. MMT does not ordinarily retain full payment-card details.
- **Website and communications information:** contact-form submissions, email interactions, device/browser data, IP address, cookie choices, website usage and campaign engagement where enabled.
- **Publicity and feedback information:** photographs, video, quotations, testimonials, student work or feedback—but identifiable use requires an appropriate, separate consent process.
- **Workforce information:** identity, contact details, experience, references, training, role, suitability, safeguarding acknowledgements, DBS status where lawful and necessary, and conduct or allegation records.

Data minimisation
Please do not send extensive medical histories, case files or unrelated sensitive information. Provide only what MMT reasonably needs for the stated purpose. MMT may ask a sender to remove, redact or securely re-send excessive information.

6. Where information comes from

MMT may obtain personal information:

- directly from the individual, including a child or young person, or from a parent/carer with appropriate authority;
- from a school, local authority, commissioner, venue or partner organisation;
- from an employee, associate, contractor, volunteer, referee or applicant;
- from another professional or safeguarding agency where sharing is necessary and lawful;

- through the MMT website, online shop, email, telephone, social media or approved platform, and from payment, delivery, hosting, analytics or communications providers.

7. Why we use information and our lawful bases

MMT must have a lawful basis under Article 6 of the UK GDPR for each purpose. The basis may vary with the context. Consent is not used where another basis is more appropriate, and safeguarding action is not dependent on consent.

Purpose	Typical information	Main lawful basis/bases
Enquiries, bookings and contracts	Contact, service, venue, availability and contract information	Steps before a contract; performance of a contract; legitimate interests for organisational contacts
Delivering workshops, mentoring, holiday provision and CPD	Participant, attendance, goals, adjustments, feedback and service records	Contract; legitimate interests in delivering, administering and improving the service
Safe delivery and emergencies	Emergency contacts, location, health/safety needs and incident information	Legitimate interests; legal obligation where applicable; vital interests in a genuine life-or-death emergency
Safeguarding and child protection	Concerns, disclosures, allegations, referrals and information-sharing records	Legitimate or recognised legitimate interests in safeguarding; legal obligation where applicable; vital interests in an emergency
Orders, payments, accounting and tax	Customer, order, delivery, invoice, payment-status and refund records	Contract; legal obligation; legitimate interests in managing accounts and preventing fraud
Website operation, security and analytics	Technical, device, log, cookie-choice and usage information	Legitimate interests for essential operation/security; consent for non-essential cookies where required
News, resources and marketing	Adult contact details, preferences and engagement	Consent where required; otherwise legitimate interests where electronic-marketing rules permit
Photos, video, testimonials and identifiable work	Image, voice, quotation, feedback or work	Specific consent, which may be withdrawn for future use
Complaints, claims, insurance and legal matters	Correspondence, service, incident, safeguarding and financial records	Legitimate interests; legal obligation; establishment, exercise or defence of legal claims
Recruitment and safer engagement	Applicant, identity, reference, training, DBS-status and suitability information	Pre-contract steps; contract; legal obligation; legitimate interests in safe recruitment and engagement

8. Special-category and criminal-offence information

Health, disability, racial or ethnic origin, religion, sexual orientation and certain other highly sensitive information are special-category data. Safeguarding or suitability records may also contain special-category or criminal-offence information. MMT only uses such information where it is necessary and an additional legal condition applies.

- Explicit consent may be used for relevant health, accessibility or adjustment information where that consent is genuinely appropriate and can be withdrawn.
- For safeguarding, MMT may rely on substantial public interest under Article 9(2)(g), together with Schedule 1, Part 2, paragraph 18 of the Data Protection Act 2018. In a genuine life-or-death emergency, Article 9(2)(c) may apply.
- Article 9(2)(f) may apply for legal claims. Criminal-offence information is processed only where authorised by UK law and an applicable Data Protection Act 2018 condition is met.

Required internal safeguards and documentation are maintained. Safeguarding information is kept separate from routine notes where appropriate and is never used for publicity or general marketing.

9. Consent and the limits of confidentiality

Where MMT relies on consent, it must be informed, specific and freely given. Consent can be withdrawn at any time for future processing by contacting MMT. Withdrawal does not make earlier lawful processing unlawful.

Mentoring information is handled respectfully, but absolute confidentiality cannot be promised. MMT may share relevant information without consent where this is necessary and lawful to protect a child or another person, respond to an emergency, obtain safeguarding advice, comply with law, or manage a serious allegation or legal claim. The child's views will be considered where appropriate, but they do not prevent necessary safeguarding action.

Separate publicity choice
Consent to mentoring, a workshop or another service is not consent to publicity. MMT will not make identifiable promotional use of a child's image, voice, quotation, testimonial or work without a separate appropriate consent process. Refusing publicity consent does not affect access to the core service.

10. Who we may share information with

Where necessary and lawful, MMT may share information with:

- parents/carers and people with appropriate responsibility or authority;
- schools, colleges, local authorities, commissioning organisations, venue providers and their DSLs or safeguarding leads;
- children's social care, a local authority designated officer (LADO), police, emergency services, health services or another safeguarding agency;
- professional advisers, insurers, legal representatives, auditors or regulators;
- website, hosting, cloud-storage, communications, video-conferencing, analytics and IT-security providers;
- payment processors, banks, accountants, delivery providers, printers and product-fulfilment providers;
- email/newsletter and customer-communication providers where used; and
- another organisation where a business transfer or legal restructuring lawfully requires it.

Only information relevant to the purpose will be shared. Service providers acting as processors must use the information only under appropriate instructions and security obligations. MMT does not sell personal information.

11. International transfers

Some technology, payment, communications, analytics or fulfilment providers may store or access personal information outside the United Kingdom. Before making a restricted transfer, MMT will use a lawful transfer mechanism, such as UK adequacy regulations or appropriate contractual safeguards, and will take proportionate steps to protect the information. Further information about the relevant safeguard may be requested from MMT.

12. How we protect information

MMT uses proportionate technical and organisational safeguards, including:

- password-protected devices, access controls and appropriately secured cloud services;
- restricted access based on role and need to know;
- secure storage of paper records and confidential disposal;
- separation of safeguarding records from routine notes where appropriate;
- data minimisation, accurate record keeping and periodic deletion/review;
- approved communication channels and no routine recording of online mentoring;
- confidentiality, safeguarding and data-protection expectations for workers and associates; and
- appropriate contracts or arrangements with organisations processing information on MMT's behalf.

No method is completely risk-free. Suspected personal-data breaches will be assessed and, where required, reported to the Information Commissioner's Office and affected individuals.

13. How long we keep information

MMT keeps personal information only for as long as reasonably necessary. Retention depends on the purpose, the age of the child, the nature and seriousness of any safeguarding concern, contractual and legal limitation periods, tax/accounting rules, insurance requirements, statutory or professional guidance, and whether the information may be needed to protect a child or respond to a complaint or claim.

Unsuccessful or inactive enquiries	Normally reviewed for deletion after 12 months, unless there is a continuing reason to retain them.
Routine service and contract records	Kept for the service and an appropriate period afterwards for administration, complaints, insurance and legal claims, taking account of the child's age.
Financial and tax records	Normally kept for at least six years after the relevant accounting period, or longer if legally required.
Safeguarding and allegation records	May be kept substantially longer where the nature of the concern, guidance, potential future relevance, insurance or legal requirements justify this.
Publicity consent and content	Kept while the consented use continues and reviewed periodically; withdrawal stops new use where practicable but cannot always reverse material already lawfully published or distributed.
Marketing records	Kept until consent is withdrawn, an objection is upheld or the purpose ends; a minimal suppression record may be retained to honour an opt-out.
Website and technical records	Kept according to security needs, cookie choices and the configured retention of the relevant service.

Information will be securely deleted, anonymised or destroyed when it is no longer needed. MMT may retain a restricted record of a deletion decision or opt-out where necessary to demonstrate compliance.

14. Your data-protection rights

Depending on the circumstances and lawful basis, individuals may have the right to:

- Be informed — about how their information is used;
- Access — their personal information and receive supplementary information;
- Rectification — of inaccurate or incomplete information;
- Erasure — in certain circumstances;
- Restriction — of processing in certain circumstances;
- Object — to processing based on legitimate interests and to direct marketing;
- Data portability — for certain information processed by automated means on consent or contract;
- Withdraw consent — at any time where consent is the basis; and
- Challenge qualifying automated decisions — although MMT does not use solely automated decision-making that produces legal or similarly significant effects.

Rights are not absolute. A request may be limited where disclosure would identify or harm another person, prejudice safeguarding, conflict with a legal obligation or exemption, or interfere with legal claims. MMT may need to verify identity and authority before responding. For a subject access request, MMT will make a reasonable and proportionate search and respond within the applicable legal time limit.

Children have their own data-protection rights. Depending on age, understanding and circumstances, a child may exercise a right directly, or a parent/carer may act with appropriate authority. MMT will consider the child's best interests and capacity rather than assuming that every request must be handled only through an adult.

15. Cookies, analytics and electronic marketing

The MMT website may use essential cookies required for security, shopping and core functionality. Non-essential analytics or advertising cookies will be used only in accordance with the website's cookie controls and applicable electronic-communications law. Users can adjust browser or website cookie settings, although disabling essential cookies may affect functionality.

Adults may receive news, resources or service marketing where they have consented or where another lawful route is permitted. Every electronic marketing message will provide an appropriate way to unsubscribe. MMT does not use children's mentoring or safeguarding information for targeted marketing. Where an online service is likely to be accessed by children, MMT will take children's needs and best interests into account and apply privacy protections appropriate to the service.

16. Complaints

To make a complaint about MMT's use of personal information, email Stu Smith at stu@themindsetmissionteam.co.uk and state that the message is a data-protection complaint. MMT will acknowledge the complaint within 30 days, investigate it appropriately and communicate the outcome without undue delay. MMT will keep the complainant informed where this is necessary. The same email address may be used to exercise a data-protection right.

You also have the right to complain to the Information Commissioner's Office (ICO), the UK supervisory authority. Current complaint information is available at www.ico.org.uk/make-a-complaint or by telephoning 0303 123 1113. Contacting MMT first does not remove the right to approach the ICO.

17. Changes to this notice

This notice was reviewed on 2 September 2026. It is intended to meet the requirements of the UK GDPR, the Data Protection Act 2018 and the Privacy and Electronic Communications Regulations 2003, as amended by the Data (Use and Access) Act 2025. MMT may update this notice when services, suppliers, law, guidance or data-handling arrangements change. The current version will be published on the MMT website. Material changes affecting existing service users will be communicated directly where appropriate. The next formal review is due in September 2027, or earlier if a relevant change requires it.

Related documents
This notice should be read alongside MMT's Safeguarding Policy, relevant consent and service agreements, website cookie information, terms and conditions, and any privacy information supplied by a commissioning school or organisation.