Data Protection Policy

Original Policy	February 2024
Updated	April 2025
Review Date	April 2026

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1 | Policy Statement

As a leading education business providing a hybrid approach to professional learning and development courses for educators in international contexts and the UK, we are committed to protecting the privacy and personal data of all individuals we interact with. This policy outlines our approach to data protection in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, OFQUAL Regulations and our obligations as a registered organisation with the Information Commissioner's Office (ICO).

The purpose of this policy is to:
- Ensure compliance with data protection laws and ICO requirements.
- Protect the rights and privacy of learners, educators, employees, and other stakeholders.
- Establish clear procedures for handling, storing, and processing personal data securely.
- Minimise the risk of data breaches and ensure timely responses to any incidents.

2 | Scope

This policy applies to:
- All Next Gen Teaching employees, contractors, and Professional Learning Hubs handling personal data on behalf of the organisation.
- All data processing activities, including the collection, storage, sharing, and disposal of personal data.
- All personal data related to learners, educators, employees, and other stakeholders.

3 | Data Protection Principles

We adhere to the following principles when processing personal data:

Lawfulness, Fairness, and Transparency
Data is processed legally, fairly, and transparently.

Purpose Limitation
Data is collected for specified, explicit, and legitimate purposes.

Data Minimisation
Only data necessary for the intended purpose is collected.

Accuracy
Personal data is kept accurate and up to date.

Storage Limitation
Data is retained only for as long as necessary.

Integrity and Confidentiality
Data is stored securely to prevent unauthorised access, loss, or damage.

Accountability
We take responsibility for ensuring compliance with data protection laws.

4 | Types of Data Collected

We collect and process the following types of personal data:

Participant Data
Name, contact details, course records, assessment results, and feedback.

Educator Data
Qualifications, employment details, and performance records.

Employee Data
Personal identification, payroll, and contractual details.

Technical Data
IP addresses, login details, and usage data from online learning platforms.

5 | Lawful Bases for Processing Data

We process personal data under the following lawful bases:

Contractual Obligation
Data processing necessary for delivering educational services.

Legal Obligation
Compliance with OFQUAL and other regulatory requirements.

Legitimate Interest
Ensuring efficient operations, quality assurance, and service improvement.

Consent
Obtained for marketing communications and optional services.

6 | Data Security Measures

We implement appropriate security measures, including:

Encryption and Secure Storage
Protecting data using encryption and secure servers.

Access Control
Restricting access to personal data based on roles and responsibilities.

Regular Audits
Conducting periodic security and compliance audits.

Incident Response Plan
Procedures in place for responding to data breaches promptly.

7 | Data Subject Rights

Individuals have the following rights under UK GDPR:

Right to Access
Request a copy of personal data held.

Right to Rectification
Correct inaccurate or incomplete data.

Right to Erasure
Request deletion of personal data when no longer necessary.

Right to Restrict Processing
Limit how data is used in certain circumstances.

Right to Data Portability
Obtain data in a commonly used format.

Right to Object
Object to data processing for specific purposes.

Rights Related to Automated Decision-Making
Challenge automated decisions impacting them.

8 | Data Sharing and Third-Party Processing

- Personal data is only shared with authorised third parties (e.g., awarding bodies, regulatory authorities) where necessary and in compliance with data protection laws.
- Data processing agreements are in place with all third-party processors.
- International data transfers comply with UK GDPR regulations.

9 | Data Retention

- Personal data is retained only as long as necessary for operational, legal, and regulatory requirements.
- Data retention periods are reviewed periodically to ensure compliance.
- Secure deletion methods are used for data disposal.

10 | Data Breach Response

10.1 Data Breach Response Procedure
- Any suspected or actual data breaches must be reported immediately to the Director - Data Protection Officer (DPO) through the **'URGENT RISK Protocol'**, as outlined in the Next Gen Teaching Risk Management Policy (see 10.2 below)
- We assess the severity of the breach and take appropriate action, including notification to affected individuals, and, where necessary OFQUAL and the ICO.

10.2 'URGENT RISK Protocol', taken from the Next Gen Teaching Risk Management Policy

7.3 Escalation Protocol
- *In the event of an Urgent Risk, the person reporting should report this directly to the Director of Next Gen Teaching, via email, with the subject line as **'URGENT RISK REPORT'***
- *The Director will then communicate this to the **Governing Body**, where an emergency meeting, via TEAMS, will be called to discuss the risk*
- *Where necessary, dependant on the risk, members of the **Academic Leadership Team** and/or **Business Development Team** may also be required at this emergency meeting*
- *Once a plan has been agreed, the **Director** will then disseminate all communication to the **Academic Leadership Team** and **Business Development Team***
- *Dependant on the level of risk, employees of NGT will be informed either via the **Director** or members of the **Academic Leadership Team**. Communication channels will be agreed in the emergency meeting as this will be in relation to the level risk and the actions to be taken*

11 | Responsibilities

- **Governing Body**: Ensure compliance with data protection regulations and oversee risk management.
- **Director - Data Protection Officer (DPO)**: Monitor data protection compliance, handle data breaches, and respond to data subject requests.
- **All Employees & Educators:** Adhere to data protection policies and report any concerns.

12 | Complaints and Queries

12.1 Data Protection Concerns
Individuals with data protection concerns can contact: **Director - Data Protection Officer (DPO)**
Contact Email: sam.cuthbert@nextgenteaching.co.uk

12.2 Information Commissioners Office (ICO)
Next Gen Teaching are registered with the ICO. If concerns are not addressed satisfactorily, individuals may contact the Information Commissioner's Office (ICO): www.ico.org.uk

Registration Reference: ZB630045

**Data Protection
Registration Certificate**

Miss SAMANTHA CUTHBERT

9 Castle Terrace
BRIGHOUSE
West Yorkshire, HD6 3HU

Registration reference: ZB630045
Date registered: 03 December 2023
Registration expires: 02 December 2025

Issued by: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF
Telephone: 0303 123 1113
Website: ico.org.uk

13 | Conclusion

This Data Protection Policy ensures that we handle personal data responsibly, securely, and in compliance with UK GDPR and ICO regulations, maintaining trust and integrity in our educational services.

14 | Policy Approval and Review

Review
This policy, Assessment, will be reviewed annually, or as required, to ensure it remains effective and relevant to the requirements of certifications and qualifications provided by Next Gen Teaching.

Feedback
Regular feedback is sought from staff, consultants, participants and Professional Learning Hubs, to improve and update this policy, ensuring that, at all times, we are adhering to best practice.

Approval
This Assessment Policy has been reviewed and approved by a minimum of two members of the Next Gen Teaching Governing Body and the Director of Next Gen Teaching.

Signatures

Name:	Samantha Cuthbert	Name:	Ian Elliott
Responsibility:	Founder and Director	Responsibility:	Chair of Governors
Name:	Siobhan Brady	Name:	Helen Hemingway
Responsibility:	Governor	Responsibility:	Governor