

(NOTE: Throughout this document, THE TEACHER TRAINER LTD is referred to as TTT)

TTT POLICY DOCUMENT

Data Protection and GDPR Policy

How TTT handles personal data lawfully, fairly and transparently under UK data protection law.

Document Control

Document Title	Data Protection and GDPR Policy
Version	1.0
Effective Date	22 April 2026
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Policy Owner	Phenil Mehta, Centre Manager
Data Protection Lead	Phenil Mehta, phenil@theteachertrainer.co.uk, 01908 736 777
ICO Registration	Held by The Teacher Trainer Ltd
Approved By	Phenil Mehta, Centre Manager
Classification	Public
Applies To	All staff, associates, learners, resellers and third parties processing TTT personal data

Data Protection and GDPR Policy

1. Purpose

This policy sets out how TTT handles personal data lawfully, fairly and transparently under the UK GDPR, the Data Protection Act 2018 and related UK legislation. It applies to every person who processes personal data on TTT's behalf and is the foundation for TTT's Privacy Notice, Data Retention and Disposal Policy and Information Security and Cyber Security Policy.

2. Scope

This policy applies to:

- All personal data processed by TTT, in any format (digital or paper), and at any stage of its lifecycle
- All TTT staff, associates, resellers, suppliers and any third party acting as processor or joint controller on TTT's behalf
- All systems used to process TTT personal data, including the Learning Management System (LMS), email, finance systems, cloud storage and messaging platforms

3. Definitions

The following terms carry the meanings given throughout this policy.

Personal Data	Any information relating to an identified or identifiable living person.
Special Category Data	Personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health data, sex life or sexual orientation.
Controller	The organisation that determines the purposes and means of processing. TTT is the Controller for learner, staff and business contact data.
Processor	An organisation that processes personal data on behalf of a Controller, such as TTT's Learning Management System (LMS) or email provider.
Data Subject	The living individual to whom personal data relates (a learner, member of staff, prospective learner, supplier contact or visitor).
Processing	Any operation performed on personal data, including collection, storage, access, disclosure, transfer, alteration, archiving and deletion.
Personal Data Breach	A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.
DPIA	A Data Protection Impact Assessment, required before undertaking processing likely to result in a high risk to data subjects.

4. Policy Statement

TTT is committed to the following principles and commitments.

1. Personal data is processed lawfully, fairly and transparently, in line with the seven UK GDPR principles set out in Section 5.
2. TTT is registered with the Information Commissioner's Office and maintains a current registration.
3. Every staff member, associate and third-party processor handling TTT personal data is bound by this policy and receives training appropriate to their role.
4. Data subjects are informed about processing through the TTT Privacy Notice at every point of data collection.
5. Data subject rights are respected and responded to within the statutory timescale of one calendar month.
6. Personal data breaches are managed under Section 12 and, where the threshold is met, reported to the ICO within 72 hours.
7. Privacy by Design and by Default is applied to every new system, process or supplier relationship involving personal data.
8. International transfers of personal data use an approved mechanism (adequacy decision, International Data Transfer Agreement or UK Addendum to the EU Standard Contractual Clauses).

5. UK GDPR Principles

TTT processes personal data in line with the following principles.

Principle	What it means at TTT
Lawfulness, fairness and transparency	Every processing activity has a documented lawful basis and a clear privacy notice.
Purpose limitation	Personal data is collected for specified, explicit purposes and not used for incompatible ones.
Data minimisation	Only the personal data needed for the specified purpose is collected and held.
Accuracy	Personal data is kept accurate and up to date; inaccurate data is corrected or deleted without delay.
Storage limitation	Personal data is retained only for as long as necessary, in line with the Data Retention and Disposal Policy.
Integrity and confidentiality	Personal data is protected by appropriate technical and organisational measures, as set out in the Information Security and Cyber Security Policy.
Accountability	TTT maintains records of processing activities, conducts DPIAs where required, and can demonstrate compliance on request.

6. Lawful Bases for Processing

TTT relies on the following lawful bases under Article 6 of the UK GDPR, depending on the activity:

Lawful Basis	Typical TTT Activity
Contract	Delivering an enrolled course, marking assessments, issuing certificates, processing payments.
Legal Obligation	Retaining records to comply with Awarding Organisation, Ofqual, HMRC or safeguarding duties.
Legitimate Interests	Quality assurance, IQA and EQA sampling, malpractice investigation, marketing to existing learners on related courses, business development analytics.
Consent	Optional marketing to prospective learners; use of testimonials; non-essential use of video or photographs; non-essential cookies.
Vital Interests	Emergency situations where a data subject's life or safety is at immediate risk.

For special category data, TTT additionally relies on Article 9 conditions, most commonly: explicit consent; carrying out obligations in the field of employment and social security; substantial public interest (equality monitoring); or vital interests in emergencies. Health, ethnicity and disability data linked to reasonable adjustments are processed under the substantial public interest (equality) condition supplemented by learner consent where practical.

7. Data Subject Rights

TTT respects and facilitates the following rights, subject to exceptions set out in the UK GDPR and Data Protection Act 2018.

Right	What data subjects can do
Right to be informed	Receive a clear explanation of how TTT processes their personal data via the Privacy Notice.
Right of access	Request a copy of the personal data TTT holds about them (a Subject Access Request).
Right to rectification	Request correction of inaccurate or incomplete personal data.
Right to erasure	Request deletion in certain circumstances, subject to retention obligations for assessment, certification and tax records.
Right to restrict processing	Request that TTT limits processing pending resolution of a dispute.
Right to data portability	Receive their data in a structured, commonly used, machine-readable format, where processing is by consent or contract.

Right	What data subjects can do
Right to object	Object to processing based on legitimate interests or direct marketing; an unqualified right to object exists for direct marketing.
Rights related to automated decisions	Not to be subject to decisions based solely on automated processing with significant effects. TTT does not make automated decisions of this nature.

Requests are directed to phenil@theteachertrainer.co.uk and are responded to within one calendar month. Where a request is complex or TTT receives multiple requests from the same data subject, TTT may extend the response time by two further months and inform the data subject within the first month.

8. Roles and Responsibilities

Role	Responsibility
Centre Manager and Data Protection Lead (Phenil Mehta)	Overall accountability; maintains ICO registration; handles data subject rights requests; authorises DPIAs; leads breach response; reviews this policy annually.
Course Coordinator	Day-to-day data handling of learner records; applies retention schedules; flags concerns to the Data Protection Lead.
Course Tutors, Assessors, IQAs and associates	Process only the personal data needed for their role; use TTT-approved systems; report suspected incidents without delay.
Processors and suppliers	Operate under a UK GDPR-compliant contract with TTT; process data only on TTT's documented instructions; notify breaches to TTT without undue delay.
Data subjects (learners, staff, contacts)	Provide accurate information; keep details up to date; exercise rights through the routes in this policy.

9. Records of Processing Activity

TTT maintains a Record of Processing Activities (ROPA) covering each category of processing (for example: Learner delivery, Marketing, Finance, Recruitment, Resellers). The ROPA records categories of data subjects and personal data, purposes, lawful basis, recipients, retention period and security measures. The ROPA is reviewed annually and when any significant new processing is introduced.

10. Privacy by Design and DPIAs

Privacy considerations are built in from the start of every new system, process, product or supplier engagement. A DPIA is required where processing is likely to result in a high risk to data subjects, for example:

- Systematic monitoring of learners, such as online exam proctoring
- Large-scale processing of special category data

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- Use of a new technology or a novel form of data processing
 - Profiling with significant effects on learners

The DPIA records the processing, assesses necessity and proportionality, identifies risks and sets out mitigations. The Data Protection Lead signs off completed DPIAs and consults the ICO where residual high risk remains.

11. International Transfers

Where TTT transfers personal data outside the United Kingdom, one of the following safeguards is in place:

- Transfer to a country with a UK adequacy decision
- The UK International Data Transfer Agreement (IDTA)
- The UK Addendum to the EU Standard Contractual Clauses
- Transfer under the UK Extension to the EU-US Data Privacy Framework where available

Transfers are documented in the ROPA and reviewed when legal or political changes affect their validity.

12. Personal Data Breach Management

1. Any suspected breach is reported to the Data Protection Lead at dataprotectionofficer@theteachertrainer.co.uk without delay and in any event within 24 hours of discovery.
2. The Data Protection Lead contains the breach, assesses risk to data subjects and logs the incident in the Breach Register.
3. Where the breach is likely to result in a risk to the rights and freedoms of data subjects, it is reported to the ICO within 72 hours of TTT becoming aware.
4. Where the breach is likely to result in a high risk to the rights and freedoms of data subjects, the affected individuals are notified without undue delay.
5. A post-incident review identifies root cause and corrective actions, which are tracked to closure.

13. Processors and Data Sharing

- TTT uses only processors that provide sufficient guarantees of UK GDPR compliance
- Written contracts (as part of agreements/licences) under Article 28 UK GDPR are in place with every processor, covering subject-matter, duration, nature, purpose, types of personal data and processor obligations
- Processors are not permitted to engage sub-processors without TTT's prior written authorisation
- Data sharing with other controllers (for example, Awarding Organisations, Ofqual, law enforcement, employers, etc.) is carried out only where there is a lawful basis and a legitimate purpose, and is documented

14. Marketing and Electronic Communications

- Direct marketing by electronic means (email, SMS) relies on the soft opt-in for existing learners or on prior consent for prospects, in line with the Privacy and Electronic Communications Regulations 2003
- Every marketing message includes a clear opt-out (Unsubscribe); opt-outs are honoured immediately
- Communication via WhatsApp for course-related purposes operates under the contract basis; non-essential marketing through WhatsApp requires consent

15. Staff Training

TTT provides data protection training to every staff member and associate at induction and at least annually. Training covers the principles in this policy, data subject rights, breach recognition and reporting, secure handling of personal data and any role-specific responsibilities. Completion is recorded.

16. Monitoring and Review

This policy is reviewed annually by the Centre Manager as part of TTT's self-evaluation process. Interim reviews are triggered by ICO guidance, legal reform, a significant breach, a supplier change or changes to TTT's systems. All outcomes are recorded in the Version History at Section 18.

17. Related Documents

This policy should be read alongside:

- Privacy Notice
- Data Retention and Disposal Policy
- Information Security and Cyber Security Policy
- Artificial Intelligence Policy
- Cookies Policy
- Electronic Communication Disclaimer Policy
- Social Media Policy
- Online Learning and Digital Conduct Policy
- Video Assessment Policy
- Safeguarding and Prevent Duty Policy

- Reseller Policy and Agreement

- Course Terms and Conditions

18. Version History

Version	Date	Author	Summary of Changes
1.0	22/04/2026	Phenil Mehta	Covers UK GDPR and Data Protection Act 2018 with explicit principles, lawful bases, data subject rights, DPIA gateway, international transfer safeguards (adequacy, IDTA, UK Addendum, UK DPF extension) and a 24-hour internal / 72-hour ICO breach response.

19. Approval

This policy has been reviewed and approved by the Centre Manager of TTT.

Phenil Mehta

Name

P Mehta

Signature

22/04/2026

Date