

Data Protection and Information Security Policy

Version 1.0 — 03 May 2026

Learner-Friendly Summary

SBK Teaching Standards collects and uses personal data so we can deliver online courses, process assessments, and meet our legal responsibilities. We only collect the information we need, keep it secure, and never share it unnecessarily. You have rights over your data, including the right to access it, correct it, or ask for it to be deleted. All data is stored securely using Moodle Cloud, Outlook, Google Drive, and our website systems. We do not work with under-18s.

1. Purpose

This combined policy sets out how SBK Teaching Standards:

- Collects, uses, stores, and protects personal data
- Ensures compliance with UK GDPR and the Data Protection Act 2018
- Maintains the confidentiality, integrity, and security of all learner information
- Ensures secure digital delivery of assessments through Moodle Cloud

This policy applies to all learners, private candidates, centre-entered learners, and any individuals interacting with SBK Teaching Standards.

2. Scope

This policy covers:

- All personal data processed by SBK Teaching Standards
- All digital systems used for course delivery and communication
- All assessment submissions and administrative records
- All safeguarding, conduct, and Prevent-related information

SBK Teaching Standards works exclusively with adults aged 18+.

3. Data We Collect

SBK Teaching Standards collects the following categories of data:

3.1 Identity & Contact Data

- Full name
- Email address
- Phone number (optional)
- Age / date of birth (to confirm 18+)

3.2 Assessment & Learning Data

- Assessment submissions (written tasks, MCQs, reflective tasks, scenario-based tasks)
- Portfolio uploads
- **Insurance documents**
- **Risk assessments**
- **Policy documents**
- Grades and feedback
- Moodle activity logs
- IP address and device information
- Cookies and analytics

3.3 Membership & Administrative Data

- Membership applications
- CPD evidence
- Renewal information

3.4 Payment Data

- Bank transfer information
- Date payment received (No card details are collected.)

3.5 Communication Records

- Email correspondence
- Moodle messages
- Facebook messages

3.6 Safeguarding & Conduct Data

- Safeguarding reports
- Behaviour or conduct concerns
- Prevent-related information

4. Lawful Bases for Processing

SBK Teaching Standards processes data under the following lawful bases:

- **Contract** – to deliver courses, assessments, and certification
- **Legal obligation** – safeguarding, Prevent, financial record-keeping
- **Legitimate interests** – service improvement, security, quality assurance
- **Consent** – optional communications or marketing

5. How We Use Personal Data

We use personal data to:

- Deliver online courses and assessments
- Verify learner identity and age
- Provide feedback and grades
- Maintain accurate membership and CPD records
- Process payments
- Respond to enquiries and support requests
- Manage safeguarding and Prevent responsibilities
- Improve our services and digital accessibility

We do not sell or trade personal data.

6. Data Storage Locations

Data is stored securely using:

- **MoodleCloud** (assessment delivery and learner activity)
- **Outlook email** (communication)
- **Google Drive** (secure document storage)
- **Website hosting provider** (contact forms, analytics)

No data is stored on personal laptops.

7. Data Retention

SBK Teaching Standards retains data for the following periods:

Data Type	Retention Period
Assessment records	5 years
Appeals & complaints	5 years
Safeguarding records	7 years
Financial/payment records	6 years
Membership records	Duration of membership + 1 year
Communication logs	2 years

After these periods, data is securely deleted.

8. Data Sharing

We only share data when necessary and proportionate.

8.1 Essential Service Providers

- MoodleCloud
- Outlook email
- Google Drive
- Website hosting provider
- Bank (for payment processing)

8.2 Legal or Safety Requirements

Data may be shared with:

- **Local authorities** (Prevent duty)
- **Police** (if required for safeguarding or legal reasons)

We do not share data with third parties for marketing.

9. Data Subject Rights

Learners have the right to:

- Access their personal data
- Request correction of inaccurate data
- Request deletion (where legally appropriate)
- Restrict processing
- Object to processing
- Request data portability
- Withdraw consent (where consent is the lawful basis)
- Complain to the **Information Commissioner's Office (ICO)**

Requests will be responded to within **30 days**.

10. Information Security Measures

SBK Teaching Standards maintains strong digital security controls, including:

- **Strong password policy**
- **Encrypted storage** for personal details
- **Regular backups** of essential data
- **Antivirus and device security**
- **Access controls** (only the Responsible Officer can access learner data)
- **Secure deletion procedures**
- **Secure configuration of Moodle Cloud and Google Drive**

All systems are monitored for unusual activity.

11. Data Breach Procedure

If a data breach occurs, SBK Teaching Standards will:

1. **Immediately contain** the breach
2. **Assess the risk** to individuals
3. **Notify affected individuals** where required
4. **Notify the ICO within 72 hours** if the breach poses a risk to rights and freedoms
5. **Record the breach** in the internal breach log
6. **Implement corrective actions** to prevent recurrence

12. Children's Data

SBK Teaching Standards does **not** work with under-18s. No children's data is collected or processed.

13. Linked Policies

This policy should be read alongside:

- Privacy Policy
- Online Safety & Learner Conduct Policy
- Safeguarding Policy
- Assessment Policy
- Complaints Policy
- Appeals Policy
- Refunds & Cancellations Policy

14. Review Cycle

This policy is reviewed:

- **Annually**, or
- When legislation or regulatory guidance changes