

Talk The Talk Data Protection and GDPR Compliance Policy

General Statement of Talk The Talk Duties and Scope

Talk The Talk processes relevant personal data regarding members of school staff, members of Talk The Talk staff and applicants for employment with Talk The Talk as part of its operation and shall take all reasonable steps to do so in accordance with this policy.

Talk The Talk is committed to conducting its business in accordance with all applicable Data Protection laws and regulations and in line with the highest standards of ethical conduct.

Talk The Talk's leadership is fully committed to ensuring continued and effective implementation of this policy and expects all Talk The Talk employees and Third Parties to share in this commitment.

This policy applies to all processing of personal data in electronic form (including electronic mail and documents created with word processing software) or where it is held in manual files that are structured in a way that allows ready access to information about individuals.

This policy has been designed to establish a baseline standard for the processing and protection of personal data by all Talk The Talk employees. Where national law imposes a requirement that is stricter than that imposed by this policy, the requirements in national law must be followed. Furthermore, where national law imposes a requirement that is not addressed in this policy, the relevant national law must be adhered to. ^[L]_[SEP]

Any breach of this policy will be taken seriously and may result in disciplinary action or business sanction.

Data Protection

Talk The Talk ensure that all personal data is processed in compliance with this Policy, the principles of the Data Protection Act 1998 and the General Data Protection Regulation Directive 2018.

Personal Data Employees

Personal data covers both facts and opinions about an individual where that data identifies the individual.

Talk The Talk staff records are held securely by the Administrator and Director.

Intellectual Property

All employment contracts cover the lodging of all company IP on termination of employment, and on a three monthly basis with the Administrator. All staff must use the adopted software for all record keeping. Our definition of IP includes copies of all transactions/emails whilst in the employment of TTT.

Personal Data Schools

Personal data of schools (corporate subscribers) and school employees (corporate users) held by Talk The Talk does not include sensitive personal data. This data is limited to:

- Corporate Subscriber Postal Address
- Corporate Subscriber Email Address

- Corporate User Name
- Corporate User Job Title
- Corporate User Email Address
- Corporate User Postal Address

Talk The Talk processes the above school data for direct marketing purposes as per our Legitimate Interest Statement which demonstrates our accountability obligations under Articles 5(2) and 24 of the GDPR. Data subjects have the right to request an opt-out to these activities, which must be respected.

Data Security

Talk The Talk will take appropriate technical and organisational steps to ensure the security of personal data. All staff, by way of induction and on-going training, will be made aware of this policy and their duties under the Act.

Talk The Talk all staff are required to respect the personal data and privacy of others and must ensure that appropriate protection and security measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to all personal data.

An appropriate level of data security must be deployed dependent on the type of data and the data processing being performed. In most cases, personal data must be stored in appropriate systems and be encrypted when transported offsite. Talk The Talk uses a password-protected CRM system to store the vast majority of its data.

No data held by Talk The Talk or its employees will be shared with any other party.

Care should always be taken in pursuing an ethos of secrecy and files should never be left on office desks, but always stored appropriately.

Talk The Talk will adopt physical, technical, and organisational measures to ensure the security and protect the confidentiality, integrity and availability of the Personal Data.

External Processors

Talk The Talk must ensure that data processed by external processors, for example, service providers, Cloud services including storage, CRM systems and web sites are compliant with this policy and the relevant legislation.

Secure Destruction

When data held in accordance with this policy is destroyed, it must be destroyed securely in accordance with best practice at the time of destruction.

Retention of Data

Records should only be stored for a statutory period as required by HMRC or other national organisations within password-protected systems or in locked cabinets. The administrator maintains key storage procedure. Records will be reviewed on an annual basis and any to be disposed of will be shredded on site or disposed of via a confidential shredding/data destruction service.

Talk The Talk GDPR Compliance – Marketing To Schools

Where digital marketing is carried out in a ‘business to business’ context, there is no legal requirement to obtain an indication of consent to carry out digital marketing to individuals, provided they are given the opportunity to opt-out.

Talk The Talk marketing to School and School Teacher Data falls under the business-to-business marketing regulations of the The Data Protection Act 2018.

Employees of corporate data, i.e. limited companies and government departments (schools and academies) are provided on an opt-out basis NOT opt-in.

Emails to employees of corporates are given the option to easily unsubscribe or opt-out from receiving further email marketing.

Talk The Talk will ensure that:

All recipients are given the option to easily unsubscribe or opt-out from receiving further email marketing. All products or services that Talk The Talk is promoting are relevant to the audience that we are emailing.

Talk The Talk will follow the GDPR compliance rules concerning:

The Right Of Access

If an individual asks Talk The Talk what information we hold on them, we must provide this without delay (Name / Job Title / Email Address / School Address)

The Right To Erasure

If an individual asks for all data that can identify them to be erased, Talk The Talk will do this without any delay.

Data Breach

Any individual who suspects that a Personal Data Breach has occurred due to the theft or exposure of Personal Data must immediately notify Talk The Talk Director, Mark Farmer, providing a description of what occurred. Notification of the incident can be made via e-mail to mark@talkthetalkuk.org or by calling 01981 580015. The Talk The Talk Director should update the internal breach log, including pertinent facts relating to the incident, effects and remedial actions taken.

All reported incidents will be investigated to confirm whether or not a Personal Data Breach has occurred. For severe Personal Data Breaches, Talk The Talk must inform the ICO within 72 hours of becoming aware of the breach. In some cases, affected Data Subjects should be advised of the personal data breach.

Appendix One – Evaluation Data

Talk The Talk processes data supplied by schools for the purposes of evaluation.

This data is always to be anonymous – with no pupil names present on any of the data provided to Talk The Talk for processing purposes.

Where hard copies of this data are provided to Talk The Talk, they will be kept securely as described above. Hard copies of this data will be destroyed securely as per above security statement.

This data will only be retained as per conditions set by national organisations.

We are committed to reviewing our policies and good practice annually

This policy was last reviewed and updated on 01.07.23

It was adopted by the trustees at their meeting on 12th July 2023

This policy is due to be reviewed in July 2024



Liz Lloyd, Chair of Trustees
13.07.23