

GDPR Officer

Navigate Staff Quick Guide

Navigate and GDPR

With responsibility for leading on college data protection, you'll know it is imperative that colleges – and those companies they outsource software services to – are compliant with GDPR.

We take the requirements of GDPR very seriously and are committed to ensuring that Navigate is compliant with all regulations.

To this end, please find our GDPR statement below:

1. Navigation Learning Ltd is aware of and committed to all relevant laws and regulations relating to the collection, storage and use of its data. This includes, but is not limited to, the Data Protection Act 1998, the 2016 EU General Data Protection Regulations (GDPR) and guidance from the Information Commissioner's Office. We understand that all data subject preferences and rights must be accommodated and adhered to.
2. Navigation Learning Ltd is aware of and committed to relevant terms and clauses for data processing as described by the ICO and where acting as the processor of personal data under this agreement, where the Licensee is the controller, will adhere to the following:
 - a. the processor must only act on the controller's documented instructions, unless required by law to act without such instructions;
 - b. the processor must ensure that people processing the data are subject to a duty of confidence;
 - c. the processor must only engage a sub-processor with the controller's prior authorisation and under a written contract;
 - d. the processor must take appropriate measures to help the controller respond to requests from individuals to exercise their rights;
 - e. taking into account the nature of processing and the information available, the processor must assist the controller in meeting its GDPR obligations in relation to the security of processing, the notification of personal data breaches and data protection impact assessments;
 - f. the processor must delete or return all personal data to the controller (at the controller's choice) at the end of the contract, and the processor must also delete existing personal data unless the law requires its storage;
 - g. the processor must submit to audits and inspections. The processor must also give the controller whatever information it needs to ensure they are both meeting their Article 28 obligations; and
 - h. the processor must take appropriate measures to ensure the security of processing.
3. Our data: Navigation Learning Ltd maintain a database of education establishments, people at those establishments, and additional profiling information relating to the establishment and/or the people who work and learn there. Typically, this will be individuals working and learning in schools, colleges and training providers.
4. Use of our data: We process personal information to enable us to provide platform services, technical support and reporting data services for our clients in relation to fulfilling our contractual obligations.
5. Methods of Research: Navigation Learning Ltd data is collected either directly from organisations that use Navigate, or from information that has been placed in the public domain. This can include school and college websites, Local Authority listings and data released by the various Departments for Education. Data is validated at its source and the date of collection/confirmation are recorded within our database. We are always clear as to the reasons for collection and use of the data.
6. Personal Data: Data related to individuals within educational establishments included in our database is defined as "personal data". Typically, this will include the individuals name, email

address, organisational identifiers (student number etc.) and other information that is used to provide reporting data to our customers. This data is held by Navigation Learning Ltd only if it has been provided by the organisation. Each college (or college group) using Navigate is the Data Controller for this information and must decide the legal basis for storing their student data in Navigate. It is the responsibility of the college to ensure students are made aware of this data and how it is used.

7. Data Security and Retention: Access to all data held by Navigation Learning Ltd is restricted by user account, permissions and passwords. The data itself is stored on dedicated servers in the UK which have restricted physical access and limited network access based on role and permission groups.
8. Navigation Learning adheres to a Data Protection Policy which forms part of all employees' contracts of employment. This policy includes rules relating to the collection, storage and use of personal data held by the company. All data held is subject to the company's research and validation procedures.
9. Data Licence and Use: The rights of the individual data subjects is key and use of the data must be in accordance with legislation and permitted use. As data controller for all student data held in Navigate, colleges (and college groups) must consider the following:
 - a. The content must be relevant to the recipient.
 - b. It must not be excessive or inappropriate to the role of the data subject.
 - c. There must be a clear opt-out on all communications – and a defined process to action and adhere to such requests.
 - d. Data must be held securely and not passed to third parties without explicit consent.
10. Data Subject Enquiries: We recognise that the data subjects held by us have the right to have their personal data removed from our database. They may also enquire about how their data was sourced.
11. If a data subject wishes to have their details removed from our database, or enquire as to the source of their data, they should contact the data controller at their college. If a data subject is still unhappy after contacting their college data controller, they may contact the Information Commissioners Office on 0303 123 1113 or via their website <https://ico.org.uk>
12. Additional information: Our Data Protection Act Registration Number is ZA085652

For more information please contact us on info@navigate.uk.com or 01634 729 818.