

## DATA PROTECTION POLICY 2020/2021

This policy informs you of how any personal data we collect from you, or that you give to us, will be processed by us, and aims to be compliant with 2018 GDPR legislation.

This policy applies to our website, application processes and procedures.

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it.

### Data Protection Principles:

Under the GDPR, there are six principles. Personal data must be processed following these principles so that the data are:

- Processed fairly, lawfully, and transparently – and only if there is a valid ‘legal basis’ for doing so
- Processed only for specified, explicit and legitimate purposes
- Adequate, relevant, and limited
- Accurate (and rectified if inaccurate)
- Not kept for longer than necessary
- Processed securely – to preserve the confidentiality, integrity, and availability of the personal data
- We aim to follow those principles.

### Definitions:

**Data controller** - A controller determines the purposes and means of processing personal data.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject – Natural person**

**Categories of data:** Personal data and special categories of personal data

### The personal data we collect from you.:

We may collect and process the following data about you, you may supply this personally or we may collect this information from anyone acting your behalf, such as parents, government sponsors, educational agents or ETOs. We will ask you to consent to give us this information. Consent is the legal basis for us collecting this information.

- Information that you provide by filling in our online application forms. This includes information provided at the time of registering to use our site, subscribing to newsletters, requesting information, or applying to study or work with us.
- Information that you provide by completing any paper application form or information request (including medical information) when applying to study or work with us. Including copies of written or printed documents you supply to support your application.
- Information you supply to using email, written correspondence or verbally.
- Dietary preferences or requirements
- Emergency contact information (names, phone numbers, email addresses)
- Medical information, which is relevant
- Special education needs information
- Information required for certificates, quality assurance purposes, safeguarding and accreditation compliance purposes, such as sessions attended, number of absences and absence reasons
- Bank information where required
- Liability and waiver forms for covid-19
- Tests it required
- Quarantine actions if required
- Information supplied by a third party and relevant to you such as your educational references, exam results, sponsorship details and English test results.
- If you contact us, we may keep a record of that correspondence.
- We may also ask you to complete surveys that we use for research purposes, although you do not have to respond to them.

- Details of your visits to our website including, but not limited to, traffic data, location data, weblogs, operating system, browser usage, the resources that you access and other communication data. Please see our cookie policy.

#### **How we use this information:**

We will use this personal data in the provision of our services, including for the necessary administration of a course booking.

Whilst most of the student information provided to us is mandatory, some of it is provided to us on a voluntary basis.

To comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

We will only use your personal data when the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- To support student learning
- To adhere to safeguarding policies and procedures
- To monitor and report on student progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To provide services to students and fulfil our contract with them
- To comply with the law regarding data sharing
- To be able to supply visa documentation where relevant
- To be able to contact you regarding your booking
- To be able to contact you while you are studying at BLC
- To make sure you are studying on an age and level appropriate course
- To be able to access relevant medical data where relevant while you are staying with us
- To be able to contact your next of kin in case of emergency

#### **Sharing**

Your personal data will be treated as strictly confidential, and will be shared only with:

- Inspectorate bodies including The British Council, ISI (Independent Schools Inspectorate).
- Professional bodies of which LanguageUK is a member. These include English UK and BAC's
- UK Visas and Immigration upon request.
- Educational Tour Organisers and Educational Consultants who work with LanguageUK to send students to the school.
- Host families/Self-Catering accommodation providers.
- LanguageUK residence providers Gauc.
- Our student database
- Taxi/meet and greet companies who provide student airport transfer services.
- Photos of students taken at social programme events and at school are shared on the school's social media sites, including Facebook, Twitter, and Instagram.

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We are required to share student information for routine inspections by bodies such as The British Council or UK Visas, British accreditation council and Immigration as referenced in the list above (Who we share student information with). We are also required to share student information for safeguarding purposes when necessary, for example if there is a welfare issue that would require the police to be involved.

We share student information with professional bodies such as English UK to develop best practice within our industry.

If students request that the school makes accommodation arrangements on their behalf as part of their enrolment with the school, we will share student information with the host family/self-catering accommodation providers.

**Special categories personal data** - The GDPR refers to sensitive personal data as 'special categories of personal data' The special categories specifically include genetic data, and biometric data where processed

to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing-** means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third parties with whom LanguageUK may need to share information:**

Some students and groups use agents to arrange their courses on their behalf. When arranging courses, we only collect and share information that is strictly relevant to the booking. For instance, when arranging transfers between the airport and accommodation, LanguageUK may need to pass on personal information to relevant third parties.

However, we will only share the information required by the third party to complete the task that is required. Third parties may include local authorities and other public authorities, healthcare professionals and independent school bodies, such as the British Council.

This data may be used to:

- Safeguard students and ensure their wellbeing (e.g. health or dental care)
- In the event of a medical emergency we will disclose your data to the appropriate medical authorities.
- Enable the relevant authorities to monitor LanguageUK performance.
- Enable students to take part in examinations and to monitor their progress.
- Compile statistical information (usually on an anonymous basis).
- Ensure each student's safe arrival in the UK and ensure they have suitable accommodation.
- If you have accommodation requirements, we will pass the relevant details on to accommodation providers who will have their own privacy policies.
- Arrange the student's entire stay through their chosen foreign agent and to give them the relevant information regarding their stay. All third parties are expected to comply with the Data Protection Act 1998 and LanguageUK has no influence over the way they use their data.

**How long we keep your information:**

We will keep personal data only for as long as is necessary to fulfil the purposes for which we collected it, including for the purposes of satisfying any legal, accounting or reporting requirements. Normally, our retention period for personal data collected for this purpose is a minimum of 5 years after the end of the period that we are providing services or support.

We hold student data on a passworded database and on our network servers, which only necessary and approved members of the school staff have access to. After five years we will anonymise any data held on the system relating to the student that could be used to personally identify them.

After this period, any student data held in folders on our system is manually deleted. After that, we keep records only of the dates of attendance and student nationality on our database to form the basis of figures for quality development planning within the school and figure analysis.

**Where we store and use your Personal Data:**

The data that we collect from you will be primarily stored on our bespoke Data base, certain staff also have access to this data. We also keep some paper copies of information on site at the school. Information may also be shared between staff as appropriate and as necessary to meet the needs of our business and to deliver your education.

The school uses email and cloud storage with Outlook Microsoft, this information is not shared with anyone else.

The data may also be used to meet our regulatory, legal, inspection or compliance responsibilities. By submitting your personal data, you agree to this transfer, storage, or processing by LanguageUK. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

Personal data will be used to provide you with our Marketing Information that you ask for, or that we think are relevant to the preferences that you may have given to us. We may analyse what areas of information

are of interest to you so that we can better target the Information that we provide. We will only use your personal data when the law allows us to and with your consent to do so.

### **Cookies**

Our website uses cookies, as almost all websites do, to help provide you with the best experience we can. Cookies are small text files stored on your computer or mobile device when you browse websites. Our cookies also provide us with aggregated information about how visitors interact with our website.

Our cookies help us:

- Make our website work as you would expect
- Improve the speed and security of our site
- Continuously improve the website for you
- Improve the quality of the information we provide you

We do not use cookies to collect any personally identifiable information about you (without your express permission), nor to pass any personally identifiable data to third parties. We do not pass personal data collected via cookies to advertising networks.

### **Permission to use cookies**

If the settings on your browser are adjusted to accept cookies, we take this, and your continued use of our website, to mean that you are fine with this. Should you wish to remove or not use cookies from our site, you can learn how to do this below, however doing so will likely mean that our site will not work as you would expect.

### **Turning cookies off**

You can usually switch most cookies off by adjusting your browser settings to stop it from accepting cookies. Doing so however will likely limit the functionality of our and a large proportion of other websites, as cookies are a standard part of most modern websites. To find out more about cookies, including how to see what cookies have been stored and how to manage and delete them, visit

<https://www.allaboutcookies.org/>

### **Links from our website**

Our website may, from time to time, contain links to and from the websites of third parties that we permit to make such links. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. We recommend that you check these policies before you submit any personal data to these websites.

### **Security:**

LanguageUK understands its responsibilities in keeping all personal data safe. Any information stored on paper is either locked in a secure place or kept in an area constantly manned by a senior staff member. All electronically stored information is securely password-protected and/or securely encrypted, and access is restricted to only the relevant members of senior staff.

Where other staff members require access, only the essential, relevant information is disclosed.

### **Your rights**

#### **Right to be provided with certain information:**

We must provide you with certain information at the time we collect your personal information, including how we use it and the legal basis for doing so, who we share it with, how long we intend to keep it, where we got the information from and your rights in relation to it. You find this information in this Privacy Policy.

#### **Right to access information:**

We must provide you with a copy of your information unless providing some or all of it would adversely affect the rights and freedoms of others, or the law allows us not to comply with your request. You can access your personal information by emailing us at [info@languageuk.co.uk](mailto:info@languageuk.co.uk). We aim to provide you with your information within 30 days.

#### **Right to correction:**

You can ask us to correct any information which you believe is inaccurate. We will update your information as soon as we can. You may need to provide supporting evidence before we can deal with your request, e.g. a copy of your marriage certificate if you want to update your name.

**Right to erasure ('right to be forgotten'):**

You can ask us to erase your personal information:

- if you think it is no longer necessary for us to hold your information.
- if you do not think we have any legitimate grounds for processing it.
- if you think we are using your personal information unlawfully; or
- if you think we should delete your personal information because the law requires us to do so.

**Right to restrict processing:**

You can ask us to stop using your personal information:

- if you think it is inaccurate.
- if you think it is illegal for us to use it.
- if you do not want us to destroy it because you need it for legal proceedings.
- if you have told we do not have a legitimate reason for using it and we are considering your request.

**Notification obligation:**

You can ask us to notify everyone to whom we have given your personal information whenever we amend, delete, or agree to restrict our use of it.

**Right to object:**

We may use your personal information to further our legitimate interests; e.g., we may use information about you to improve our marketing messages because we have a legitimate interest in making sure our students know about courses which could be of benefit to them. We will always give you a right to object whenever we intend to use your personal information for our legitimate interests.

Questions, comments, and requests regarding this privacy policy are welcomed and should be addressed to:

Languageuk

9 St Georges Place

Canterbury

CT1 1UT

Tel number 0044 (0)1227455556

[info@languageuk.com](mailto:info@languageuk.com)

**Making a complaint:**

If you are unhappy with how we have handled your information you can refer your concerns to the Information Commissioner's Office, the body that regulates the handling of personal information in the UK, at:

**Information Commissioner's Office**

03031231113 or via email <https://ico.org.uk/global/contact-us/email/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, England.

**Changes to our policy**

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

**Issued - October 2016**

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**Reviewed -November 2019**

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