

Data Protection Policy

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Related documents

Host handbook

GDPR photography

Parent and Host agreements

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Purpose

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 1998, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically.

All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

General Statement

UK Guardians collects and uses personal information about staff, students, overseas parents, host families and other individuals who meet the organisation. This information is gathered in order to enable it to provide a guardianship service and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that UK Guardians complies with its statutory obligations.

UK Guardians has a duty to be registered, as Data Controllers, with the Information Commissioner's Office (ICO) detailing the information held and its use. These details are then available on the ICO's website.

UK Guardians is always committed to maintaining the above principles. Therefore, UK Guardians will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our staff are aware of and understand our policies and procedures
- Ensure that the necessary consent is obtained, and safeguards are in place before using any photographs of students in publicity materials or within our website or social media activity.

What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes
3. Personal data shall be adequate, relevant, and not excessive
4. Personal data shall be accurate and where necessary, kept up to date
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998
7. Personal data shall be kept secure i.e., protected by an appropriate degree of security
8. Personal data shall not be transferred to a country or territory outside the European Economic Area, unless that country or territory ensures an adequate level of data protection

How we acquire data

Student information is given to us by parents/guardians or educational agencies that are instructed by parents/guardians of each student.

Information we hold includes, but is not limited to:

- Full names or parents/guardians & students
- Home Address
- School Address
- Contact Details
- Medical Information
- Passport Information
- Image of student ID (Photo page of passport)
- Photos of student with family members

Basic host family information is supplied to us by the individual during their initial application (e-mail or telephone), then further detail is provided by the host family during their “home visit” with a UK Guardians Compliance Team.

Information we hold, includes but it not limited to:

- Full names of all household members
- Full names of all regular household guests
- Home Address
- Contact Details
- Photos of family members
- Photos of the homestay property

In processing your application and as part of our safer recruitment policy, we will share your information with a third-party agency called Eurocom who we use to undertake a DBS check as an essential part of our screening process. The information Eurocom gather is also handled in accordance with the Data Protection Act 1988 and the General Data Protection Act 2016

As part of our accreditation process we need to share contact details with AEGIS head office and their inspection team, we permit them to process data only for specified purposes and in accordance with GDPR.

Retention period of information

For students, our retention period is the length of time a student is under our guardianship plus 7 years from leaving, as all records are integrated within our account's information.

After 7 years of inactivity, the data held for students and host families is automatically deleted.

Security precautions in place to protect the loss, misuse, or alteration of your Information.

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. We store your information in a variety of ways.

Cloud backup is used to back up the devices and stored with major providers. Secure file sharing is used to various devices with a major provider.

Privacy Notice

GDPR includes the following rights for individuals:

The right to be informed: UK Guardians is committed to fair processing information, this is through our privacy notice on how your data will be kept and stored.

The right of access: At any time, anyone can access their data that we store and how it is processed. Information will be shared without delay and within one month. This can be extended if agreed by both parties and the request(s) are complex or numerous.

the right to rectification:

The accuracy of your information is important to us. You have the right to request a copy of the information we hold about you so that you can ensure its accuracy. You can do this by the following methods:

Send an email to helen@ukguardians.co.uk and request the information held on file about you or Telephone: 04125 521198

The right to erasure: Once a contract has ended with UK Guardians, students and host families have the 'right to be forgotten', and all data will be deleted in accordance with the above policy. This means that we would erase all their data from our records, after 7 years of inactivity. Once a student becomes 16, they have the 'right to be forgotten' and can request this directly themselves.

The right to restrict processing: If data appears to be inaccurate, it will not be processed until verified. If processing the data becomes unlawful, processing will be restricted but not erased.

The right to data portability: UK Guardians recognises the right to data portability.

The right to object: UK Guardians may use data internally for marketing purposes, both text and photos.

Everyone has the right to object to their information being used in this way. Simply let us know by emailing helen@ukguardians.co.uk

UK Guardians has a duty to protect your data. If you believe there has been a breach of data protection, we suggest first contact Helen (helen@ukguardians.co.uk)

If you are unsatisfied with the outcome of our internal investigation, please contact the Information Commissioner's Office (ICO) +44 303123 1113

Complaints

Complaints will be dealt with in accordance with UK Guardians' complaints policy. Complaints relating to information handling may be referred to the Information Commissioner (the statutory regulator).

Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the Director or nominated representative.

Contacts

If you have any enquires in relation to this policy, please contact Mrs Helen Herridge who will also act as the contact point for any subject access requests.

Further advice and information are available from the [Information Commissioner's Office](#) or telephone 01625 545745