

## Data Protection and Privacy Policy

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This policy outlines our approach to handling personal information in accordance with the UK General Protection Regulation 2016 (UKGDPR) and the Data Protection Act 2018.

The purpose of this Policy is to explain how we handle personal information under the relevant data protection laws.

### Scope

This policy applies to the processing of personal information held by EPG. This includes personal information about parents, students, homestays, suppliers, business contacts,

drivers, schools and other people the guardianship organisation has a relationship with or may need to contact.

### Definitions

**Student:** A student for whom English Plus Guardianship has educational guardian responsibilities.

**Student families:** Parents or other family members who are the legal guardians of the child

**School:** The school at which the student is studying in the UK

**Minor / U18:** Young people under the age of 18 for whom we have a duty of safeguarding

**Personal data:** Data which can identify individuals such as name, address, phone number and email

**Sensitive personal data:** This can include but is not limited to health information, details of past convictions and of any issues at work or within family life

**Data Controller:** A person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data.

**Team members:** Katherine Milburn and any hosts or drivers who operate within English Plus Guardianship

### Responsibilities

The Data Controller at English Plus Guardianship is Katherine Milburn who can be contacted at [english.plus.wales@gmail.com](mailto:english.plus.wales@gmail.com) or Tel: 07958539922

All Team members who process personal information on behalf of EPG are responsible for complying with this policy in its entirety.

### Data Protection Principles

EPG will handle and protect all information in line with data protection principles set out in the UK GDPR.

Data will be:

- Fairly and lawfully processed.
- Processed for limited purposes.
- Adequate, relevant and not excessive in relation to the purpose(s) for which they are processed; (data limitation)
- Accurate and kept up to date; (accuracy)
- Not kept longer than necessary; (storage limitations)
- Processed in accordance with the data subject's rights under the Act.
- Secure and protected. Appropriate technical and organisational measures are in place to protect data from unauthorised or unlawful processing and from accidental loss, damage or destruction; (integrity and confidentiality)

- With transparency and by keeping records that we are complying with these regulations.

For full details of how data is processed to ensure we meet standards of lawfulness, fairness and transparency, please see table below

### Data Protection Rights

EPG will do all we can to ensure that all individuals who come into contact with EPG are fully aware of all your data protection rights. Every user is entitled to the following:

**The right to access** – The right to request EPG for copies of your personal data. We may charge a small fee for this service.

**The right to rectification** – The right to request that EPG correct any information believed to be inaccurate. The right to request EPG complete any information believed to be incomplete.

**The right to erasure** – The right to request that EPG erase personal data, under certain conditions.

**The right to restrict processing** – The right to request that EPG restrict the processing of personal data, under certain conditions.

**The right to object to processing** - The right to object to EPG processing of personal data, under certain conditions.

**The right to data portability** – The right to request that English Plus Guardianship transfer the data that has been collected to another organization, or directly to you, under certain conditions.

**The right of complaint** – The right to complain to the ICO if an individual or organisation is not happy with how their personal information has been processed or feel that their data protection rights have been infringed.

If an individual makes a request, we have one month to respond. Any person wishing to exercise any of these rights, can contact us at our email:

**We may be limited in respect of restricting or erasure of processing where there is a legal requirement that takes precedence**

### Keeping Data Secure

- Data is stored electronically using applications that are password protected and changed regularly. Only Senior Members have access to these.

- Where paper copies are used, they are securely stored and destroyed securely by shredding after use.
- Cloud storage has backup.
- Personal or sensitive information is sent using encrypted email
- We have firewall and anti-virus software in place
- Any paper documents containing personal information are locked away when not in use. Keeping such documents in kept to a minimum.
- EPG team take every opportunity to ensure that information held is accurate and kept up to date
- EPG team members do not disclose personal information to unauthorised persons both within and outside of the team.

### Data Disposal

Where hard copies are no longer in use, they will be shredded before disposal.

Digital records will be disposed of by deleting the relevant records

As much as possible, personal information is removed from communication channels such as emails and WhatsApp where that person is referred to directly and particularly where it is sensitive personal information.

### Managing Personal Data Breaches

This means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data.

All suspected or actual breaches must be reported to the Data Controller, who will be responsible for investigating and recording any data breaches. Katherine Milburn will be responsible for deciding whether a data breach shall be reported to the ICO.

Where there is a risk that the data breach will contravene the rights of individuals whose data is affected, then Katherine Milburn will inform the ICO within 72 hours of the breach being detected.

Katherine Milburn will notify such individuals concerned without delay including the following information:

- Details of the breach
- Who to contact for further information
- Measures taken to mitigate the impact of the breach and to prevent any further breaches occurring.

## Data Collection and Processing Details for English Plus Guardianship

Type of Data	What data do we collect	Reason for collecting the data	How is the data collected	Who is it shared with	How do we protect the data	Data updated and kept until
<b>Student Data A</b>	Contact Information: name, email, phone number, medical information, educational background, interests, any special learning needs, headshot image	Legitimate interest: to carry out normal business activity and for supporting the welfare of the child	By application form sent via email or online, or filled in on paper	Homestay hosts (primary carer only) via email. Third parties where there is a legitimate safeguarding need	Stored digitally in cloud-based software – password protected.	Updated if school or parents inform of change of circumstances. Erased 7 years after the end of services
<b>Student Data B</b>	Home address, parental contact information, special learning needs and academic background, medical information, passport data, school academic records	Legitimate interest; to carry out normal business activity and for supporting the welfare of the child, to support student learning	By application form sent via email or online, or filled in on paper  School records to be viewed on school website where there is a valid reason. In the students' interest	Third parties where there is a safeguarding need.	Stored digitally in cloud-based software – password protected.	
<b>Student Data C</b>	Records of activities including school visits, concerns, homestay logs and transport logs	Keeping legitimate records for the benefit of the welfare of the student	Recorded by hosts and EPG	Authorities where there is a safeguarding need	In online logs which are stored in cloud-based software. Homestay logs	

					kept on paper in a secure location and destroyed after the contents have been transferred to the online system	
<b>Supplier Information; suppliers of facilities, contracted teachers, and instructors, outside agencies etc.</b>	<p>A. Contact Information: name, address, email, phone number</p> <p>Bank information</p> <p>B. Contracted professionals may provide more sensitive details such as DBS records, ID, qualifications etc</p>	<p>A. Legitimate interest to carry out normal business activity including facilitating payments</p> <p>B. To fulfil statutory requirements for risk assessments, to meet contractual agreements and for safeguarding purposes. Also, for the purpose of supplying references</p>	Email, face to face, What's App or on the phone.	<p>A. Personal information is shared internally unless specific permission is given to share with third parties. B. General information not linked to specific names) regarding suppliers' experience, qualifications and safeguarding may be used for marketing purposes</p>	Stored digitally in cloud-based software – password protected	<p>A. Contact information: as long as that supplier is in operation and we are likely to be using their services. B. Individual information for contacting: for five years after the final contracted period for legal requirements</p>
<b>Host families</b>	Personal information including address,	Normal delivery of services and to fulfil	Job application sites, website	Students, house parents and the	Stored digitally in cloud-based	Updated at annual house

	phone number, job, family members, pets and hobbies	contractual agreements with customers	contact forms, email, face to face or over the phone and messaging apps such as WhatsApp, Messenger and SMS	families of students who will be staying with the hosts. Third party for the purpose of DBS checks. Statutory bodies where that is necessary in the interests of the student	software – password protected Printed copies are kept to a minimum and destroyed or kept in locked cabinet after use.	check. Data related to specific students held for seven years
	Personal sensitive data such as relevant health history, DBS information, references	Legal requirements for safeguarding	Face to face and over the phone	Internally unless additional consent is given for AEGIS), there is a safeguarding concern, or it is necessary to share with responsible adults for U18s for the welfare of the minor	Secure, password protected apps for digital storage. Hard copies kept in locked cabinet.	
<b>Visitors to website</b>	Anonymous details of visit including but not limited to traffic data, communication and location data.	For legitimate business interests	English Plus websites	Internal use. Anonymous data may be used for internal research which may be	Password protected data	Anonymous information kept indefinitely

	Information that user provides when filling in contact forms.			shared with third parties		
<b>Parents and other family members of Students</b>	Contact Information: name, address, email, phone number	Legitimate interest; to carry out normal business activity and for the wellbeing of the student	By email or online forms	Internal English Plus use unless there is a safeguarding concern that requires sharing information with statutory authorities	Stored digitally in cloud-based software – password protected	Updated if school or parents inform of change of circumstances. Erased 7 years after the end of services
<b>Drivers</b>	Photocopies of ID, full name and phone number. We also see but don't keep evidence of car insurance	Legitimate interest and for the safeguarding of Students	Email or What's App	Students, their parents and school. Occasionally shared with airlines where UMs are involved	Digitally in cloud-based software	Contact information kept until that person has not longer collaborated with English Plus Guardianship for 7 years

### Who needs to know this policy?

**English Plus Guardianship**

### How will they know about it?

Discussion and updating of policy at regular meetings  
 Website: [www.english-plus.co.uk](http://www.english-plus.co.uk)



<b>Homestay Hosts</b>	Information given in Host Family Handbook and contract. www.english-plus.co.uk
<b>Drivers</b>	In induction information <a href="http://www.english-plus.co.uk">www.english-plus.co.uk</a>
<b>Parents and Students</b>	In relevant handbooks Website: www.english-plus.co.uk

### Further Related Documents

CCTV Code of Practice

Photography and Film Policy

### Legislation Relevant to this Policy

#### The Information Commissioner's Office

The Information Commissioner's Office (ICO) is "the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals" (ICO website). It is responsible for administering the provisions of the Data Protection Act 1998; the Freedom of Information Act 2000; and the General Data Protection Regulation 2018.

The Act requires every data controller who is processing personal information to register with the ICO (unless exempt). English Plus Guardianship is registered with the ICO as a data controller, and this is renewed annually (Registration reference: ZA779037).

The ICO publishes a Register of data controllers on their website, on which English Plus Guardianship is listed.

#### The Freedom of Information Act 2000

The Freedom of Information Act 2000 provides public access to information held by public authorities, in two ways:

- public authorities are obliged to publish certain information about their activities; and
- members of the public are entitled to request information from public authorities.

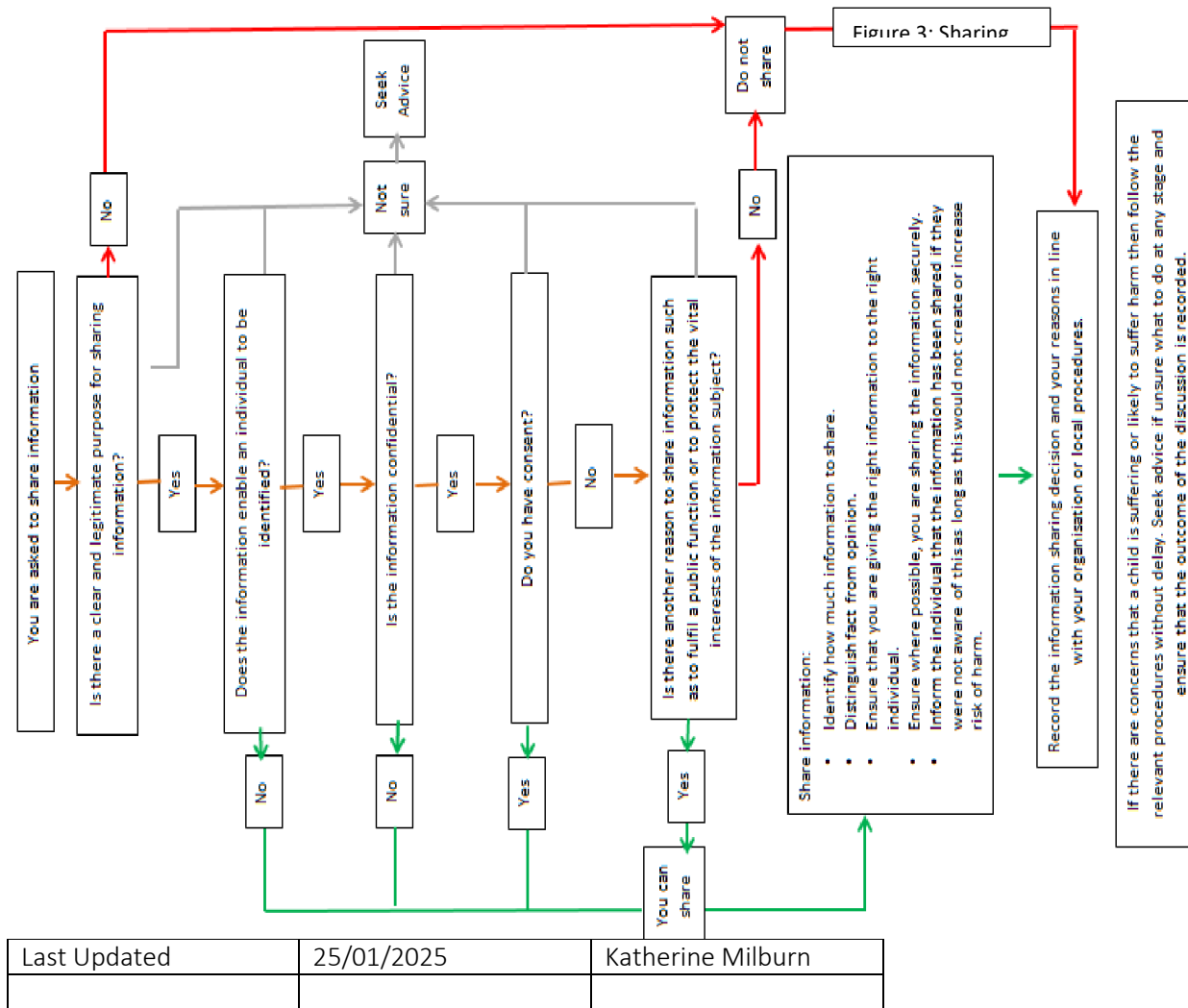
### General Data Protection Regulation 2018

Regulations have binding legal force throughout every Member State and enter into force on a set date in all the Member States. The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union.

GDPR replaces the 1995 Data Protection Directive (Directive 95/46/EC) -The Data Protection Act 1998. Although the key principles of data privacy still hold true to the previous directive, many changes have been proposed to the regulatory policies.

The GDPR places greater emphasis on the documentation that data controllers must keep demonstrating their accountability. Compliance requires organisations to review their approach to governance and how they manage data protection as a corporate issue.

[Pathway to Sharing Personal Data](#)



For further questions or information not covered in this policy, please contact English Plus directly.