

Privacy policy

This is the statement of general policy and arrangements:

Overall and final responsibility is that of:

Day-to-day responsibility for ensuring this policy is put into practice is delegated to:

Isca School of English
Sarah Tomlinson,
Administration/Office Team

Statement of general policy	Responsibility of (Name / Title)	Action / Arrangements
<p>Our Privacy Policy is in place to govern any kind of processing where we act as a data controller or co-controller (including collection, use, transfer, storage and deletion) of personally identifiable information.</p> <p>We will collect and use your personal information only if we have sensible business reasons for doing so.</p> <p>We will be guided by the following principles when processing data:</p> <ul style="list-style-type: none"> We will only collect data for specific and specified purposes We will make it clear at the point when we request your information, what we are collecting it for and how we are going to use it. We use our student photos, nationality statistics and age statistics to provide information and show the school environment to other prospective students on our website, social media channels in our newsletter and in our brochure. 	<p>Sarah Tomlinson, Principal</p> <p>Relevant Office staff</p>	<p>Relevant risk assessments completed and actions arising out of those assessments implemented. (Risk assessments reviewed every year or earlier if working habits or conditions change.)</p> <p>Please note that our GDPR Policies are separate documents for Students and Parents Staff and Homestay providers. Please ask for a copy of the appropriate document: study@iscaschool.com</p> <p>Please read the following policy carefully to understand what information we may collect from you, how we may use it, and your rights in respect of our use.</p> <p>We will not use data for purposes other than that for which the data was collected, except as stated, or with prior consent.</p> <p>We will seek to verify and/or update data periodically, and we will accept requests for amendments of personal data.</p> <p>Except when stated, we will not store data in identifiable form longer than is necessary to accomplish its purpose, or as is required by law.</p>
<p>Information collected. We collect information on the following categories of users:</p>	<ul style="list-style-type: none"> When you apply to join a course or programme at the school When you contact us for information, via our website, by email, by phone, in person or via social media channels. When you work with us in a commercial capacity (for 	<p>The categories of information that we collect, hold and share include:</p> <ul style="list-style-type: none"> Personal information (such as name, email addresses, phone numbers, address and passport information). Characteristics (such as language, nationality, country of birth) Attendance information (such as sessions attended, number

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	<p>example as an ETO or partner)</p> <ul style="list-style-type: none"> • When you apply to be an English homestay Provider in Exeter • When you apply to work at Isca School of English, and when you are subsequently employed by Isca School of English • If you post on our social media channels or on our website or blog 	<p>of absences and absence reasons)</p> <ul style="list-style-type: none"> • Relevant medical information including medical insurance • Special educational needs information • Consent Forms • Travel Information and Consent Form • Emergency contact information (names, phone numbers, email addresses)
<p>Our students: What personal data do we ask you to provide us with?</p> <p>Before you start and during your relationship with us we will collect, store and process the following personal data:</p> <p>The lawful basis on which we use this information Under Article 6 of the GDPR we collect and use student data as per lawful base: (f) Legitimate interests: the processing is necessary for our legitimate interests.</p> <p>Why we collect and use this information We use the student data:</p> <ul style="list-style-type: none"> • 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 for marketing purposes within the EFL industry (please note, personal data is never used) 	<ul style="list-style-type: none"> • Full Name • Address • Contact telephone numbers • Contact email address • Date of birth • Passport number • Photo or Video • Next of kin contact details including mobile and email. • Consent Forms and other documentation as relevant • Course and language capability details • Medical details and insurance • Other relevant and necessary information to allow us to provide you with the best service 	<p>Permission to collect and store data of students under the age of 18 is obtained directly from the child's parents or legal guardian through our parental consent form.</p> <p>Who has access to your personal data? We are committed to restricting access to personal data to just those individuals who may need it to meet their or the school's obligation.</p> <p>The specific data each individual has access to be limited to <u>only</u> that which is necessary for them to be able to carry out their function.</p> <p>For us this means the following may have access to some or all of your data:</p> <ul style="list-style-type: none"> • Principal • Office Staff • Welfare staff • Your Homestay • Your Teachers • Your Social staff • Isca Airport Transfer team

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<p>• For marketing purposes. We use nationality statistics, course length statistics and age statistics only for marketing purposes.</p> <p>However, we take your privacy seriously and will therefore, never sell your personal data to anyone and will take precautions to keep it secure.</p>		<p>Who do we share your personal data with outside of the school?</p> <p>In order to fulfil our regulatory and contractual obligations we will need to share your personal data with third parties outside of the school. We have also chosen to outsource some of our operational requirements and our outsourced suppliers also need access to your personal data. In all cases we have committed to limiting the personal data that we share to only that which is necessary for them to be able to carry out the function we have contracted with them to perform.</p> <p>Your data may be shared with:</p> <ul style="list-style-type: none"> Government Enforcement Agencies e.g. the Home Office; Immigration; the Health & Safety Executive, the Police • Quality Standard Inspectorates e.g. the British Council; English UK, English UK Young Learners • Education Travel Organisations (Agents) • Hotels, student residences and homestays as appropriate • Leisure Providers where consent is needed for you to enjoy the activities e.g. watersports • Taxi & airport transfer providers <p>How long do we retain your personal data?</p> <p>We will retain all your personal data for the duration of your contract and then for a further 6 years to enable us to meet our regulatory and legal obligations; to ease administration should you wish to return to undertake further studies; and to keep you up to date with news from Isca School of English which may be of interest to you. After 6 years all</p>

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		records will be deleted.
<p>Our Educational Travel Operators</p> <p>Who has access to your personal data? We are committed to restricting access to personal data to just those individuals who may need it to meet their or the school's obligation. The specific data each individual has access to be limited to only that which is necessary for them to be able to carry out their function.</p> <p>For us this means the following may have access to some or all of your data:</p> <ul style="list-style-type: none"> • Principal • Relevant Office Staff • Relevant third Parties <p>We take your privacy seriously and will therefore, never sell your personal data to anyone and will take precautions to keep it secure.</p>	<p>What personal data do we need from you?</p> <p>Before you start and during your relationship with us we will collect, store and process the following personal data:</p> <ul style="list-style-type: none"> • Full Name • Company Address • Contact telephone numbers • Contact email address • Bank details 	<p>Your data may be shared with:</p> <ul style="list-style-type: none"> • Quality Standard Inspectorates e.g. British Council; Quality English • Government Enforcement Agencies e.g. the Home Office; Immigration • the Health & Safety Executive • the Police <p>Who do we share your personal data with outside of the school? In order to fulfil our regulatory and contractual obligations we will need to share your personal data with third parties outside of the school. We have also chosen to outsource some of our operational requirements and our outsourced suppliers also need access to your personal data. In all cases we have committed to limiting the personal data that we share to only that which is necessary for them to be able to carry out the function we have contracted with them to perform.</p> <p>How long do we retain your personal data? We will retain all your personal data for the duration of your contract and then for a further 5 years to enable us to meet our regulatory and legal obligations. After 5 years all records will be deleted.</p>
<p>Our Homestay Providers What personal data do we need from you?</p> <p>Who has access to your personal data?</p> <p>We are committed to restricting access to personal data to just those individuals who may need it to meet their or the school's obligation.</p> <p>The specific data each individual has access to be limited to only that which is necessary for them to be able to carry out their function. F</p>	<p>Before you start and during your relationship with us we will collect, store and process the following personal data:</p> <ul style="list-style-type: none"> • Full Name • Address • Contact telephone numbers • Contact email address • Bank details 	<p>How long do we retain your personal data?</p> <p>We will retain all your personal data for the duration of your contract and then for a further 4 years to enable us to meet our regulatory and legal obligations.</p> <p>After 4 years all records will be deleted.</p> <p>We will retain any legally obligated documentation for as long as we are required to. It will then be destroyed.</p> <p>Who do we share your personal data with outside of the school?</p> <p>In order to fulfil our regulatory and contractual obligations we will need to share your personal data with third parties outside of the school. We</p>

<p>or us this means the following may have access to some or all of your data:</p> <ul style="list-style-type: none"> • Principal • Office Staff • Welfare Summer staff • Your Students <p>However, we take your privacy seriously and will therefore, never sell your personal data to anyone and will take precautions to keep it secure.</p>	<ul style="list-style-type: none"> • Passport number or Driving Licence • Personal references for hosts • Contract and annual updates • Risk Assessments on your property • Proof of gas safety certificate • Ages of all residents and proof of current DBS for all over 18s in the household • DBS 	<p>have also chosen to outsource some of our operational requirements and our outsourced suppliers also need access to your personal data</p> <p>Your data or the relevant sections may be shared with:</p> <ul style="list-style-type: none"> • Students and their parents • Quality Standard Inspectorates e.g. The British Council; English UK • Government Enforcement Agencies e.g. the Home Office; Immigration; the Health & Safety Executive, the Police • Civil & Corporate – DBS Checking Service • Devon Fostering Team • Education Travel Organisations (Agents) • Taxi & airport transfer providers <p>In all cases we have committed to limiting the personal data that we share to only that which is necessary for them to be able to carry out the function we have contracted with them to perform.</p>
<p>Legal bases for processing your data The General Data Protection Regulation (GDPR) establishes 6 legal bases on which we can process your data: these are Consent, Contract, Legal Obligation, Vital Interests, Public Task and Legitimate Interests.</p> <p>For further information about these legal bases and fuller definitions, please refer to the ICO website. We use different legal bases for processing your data depending on the purpose for collecting your data in the first instance:</p>	<ul style="list-style-type: none"> • For all data collected as part of the process of enquiring about, applying for and booking a course or for any other related service (e.g. homestay, airport transfer, social programme, insurance to cover you during your stay, or where you give us feedback about aspects of this provision, we process using Contract or Legitimate Interests, namely the fulfilment of the booking. This may include sending of your data to our partners such as Educational Tour Operators (ETOs), Government Agencies or Schools. 	<p>Where required by law to do so, we may also process your data under Legal Obligation.</p> <p>Any processing of customer data not directly related to the fulfilment of a booking or related services, such as signing up for newsletters or free lessons on our website, or sending messages to you on behalf of third parties, is managed under Consent.</p> <p>From time to time, we may use elements of the data you supply to target the messages we send to you. For example, we may use your location to send you information about an event or opportunity happening in your area.</p> <p>During your stay at Isca School of English, we may take photographs or videos of you, and the use and processing of these is also managed through Consent.</p>

<p>Children under 18</p> <p>We collect or store personal information about children under the age of 18 in the context of managing bookings and directly related products, and for safeguarding purposes. Permission is obtained directly from a legal adult guardian to collect this information through our Parental Consent Form.</p>	<p>As part of this process, we request special category data relating to the health of the child, which we manage through Vital Interest. We also gain consent from parents for the use of photos or video taken during their child’s stay at Isca School of English through the Parental Consent Form.</p>	<p>Information collected via our website How we will use information collected by our website We may use information held about you in the following ways:</p> <ul style="list-style-type: none"> • To process a booking for one of our courses or products • To manage an application to work for the school to be a homestay. • To create a profile for you to help us provide a more personalised service which is suited to meet your preferences. • To ensure that content from our site is presented in the most effective manner for you and your computer. • To send you our newsletters or provide you with information, products or services that you request from us or which we feel may interest you, where you have consented to be contacted for such purposes. • To allow you to participate in interactive features of our service, when you choose to do so. • To notify you about changes to our service.
<p>For all data collected as part of the process of employing and managing staff, we process using Contract, Legal Obligation and Legitimate Interests, namely the employment of the employee.</p>	<p>This will include data required for HMRC, pensions and insurance. In the event of our sending newsletters to our staff, these will be managed under Legitimate Interest.</p>	<p>For all data collected as part of the process of recruiting and managing homestay providers, we process using Contract, Legal Obligation and Legitimate Interests, namely the maintenance of the relationship with the homestay.</p>

<p>As newsletters and emails to homestays are an important part of how we communicate with them, these are managed under Legitimate Interest.</p>	<p>We may process any of your personal data identified in this policy where necessary for the establishment, exercise or defence of legal claims, whether in court proceedings or in an administrative or out-of-court procedure. The legal basis for this processing is Legitimate Interest, namely the protection and assertion of our legal rights, your legal rights and the legal rights of others.</p>	<p>We may process any of your personal data identified in this policy where necessary for the purposes of obtaining or maintaining insurance coverage, managing risks, or obtaining professional advice. The legal basis for this processing is Legitimate Interest, namely the proper protection of our business against risks.</p> <p>We will make it as easy as we can for you to opt out of unwanted processing under Consent, providing it does not restrict our ability to provide you with the primary service you have requested.</p>
<p>We collect data for a wide range of purposes. Data is managed to ensure that it is either erased from our system when it is no longer required for the purpose for which it was collected, retained for legal reasons, or minimised and retained.</p> <p>We are co-processors of information relating to marketing and booking clients with partners overseas (for example ETOs, schools, and government and national sponsors). As such, we may transfer some data outside of the EU, but this will be limited to data necessary for the performance of a contract made in the interests of the individual (which is an exemption to the 8th principle of the GDPR legislation). We remain responsible for the data held, processed or sent via our systems. We are not responsible for the security and processing of data which is held, processed or sent via our partners' systems. However, we require all of our partners overseas to confirm that they will process data securely in line with the requirements of</p>		<p>We may process and record securely risk assessments of these DBS checks where the disclosure is not clear. These risk assessments will be disposed of securely when that person no longer has supervisory responsibility or unsupervised contact with young people under the age of 18 on behalf of the school.</p>

<p>GDPR or the equivalent in their country. We do not sell your data at any time.</p>		
<p>For all data collected as part of managing our relationship with commercial partners, such as ETOs, Government Agencies and Schools, we process using Contract, Legitimate Interest and Legal Obligation, namely the maintenance of the commercial relationship.</p>	<p>We may request updates to your information and contracts</p>	<p>As newsletters to commercial partners are an important part of how we communicate with them, these are managed under Legitimate Interest.</p>
<p>The school has safeguarding responsibilities and carries out DBS checks on all staff and other people who are likely to have direct supervisory responsibility for or unsupervised contact with young people under the age of 18.</p>	<p>Special Category Data/Criminal Record Data We may request health data from potential students, employees and prospective homestay providers.</p>	<p>This data has special protection under the GDPR under the specific conditions listed in Article 9 (2) of the GDPR that processing is necessary either to protect the vital interests of the data subject, (or of another natural person where the data subject is physically or legally incapable of giving consent), or where processing is necessary for the purposes of preventive or occupational medicine or the assessment of the working capacity of an employee.</p>

<p>Links from our website</p>	<p>Our website contains links to and from websites operated by individuals and companies over which we have no direct control. If you follow a link to any of these websites, please note that these websites have their own privacy and terms of use policies and that we do not accept any responsibility or liability for these policies. We advise you to check these policies before you submit any personal data to these websites</p>	
<p>What to do if you have a concern or complaint about how we store, use or share your personal data?</p>	<p>Initially, we would encourage you to raise this directly with us and depending on the nature of the concern or complaint we should be able to resolve the matter informally. If following this you do not believe that your concern has been adequately addressed, than you should raise your</p>	

	<p>complaint in writing. In the unlikely event that we have been unable to address your concern internally, you may call the Information Commissioner's Office helpline on 0303 123 1113. Changes to our Privacy Policy Any changes we may make to our Privacy Policy in the future will be posted on our website in this document. Please check from time to time to ensure that you are aware of any changes to our Privacy Policy.</p>
<p>You also have the right to withdraw consent to the processing of information for which you have previously given consent. You may also request access to the data we hold on you.</p>	<p>Please email us for information about how to access your documentation.</p>

Produced by	Richard Tomlinson	Date:	04.05.2007	Last revised	10/02/2020
Subject to review, monitoring and revision by:	Sarah Tomlinson	Every:	12	months or sooner if work activity changes	