



PRIVACY NOTICE - Students

In accordance with the General Data Protection Regulation (GDPR), we have implemented this privacy notice to inform our students of the types of data we process about them. We also include within this notice the reasons for processing data, the lawful basis that permits us to process it, how long we keep data for and your rights regarding your data.

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This notice applies to current and former students.

A) DATA PROTECTION PRINCIPLES

Under GDPR, all personal data obtained and held by us must be processed according to a set of core principles. In accordance with these principles, we will ensure that:

- a) processing is fair, lawful and transparent
- b) data is collected for specific, explicit, and legitimate purposes
- c) data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- d) data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- e) data is not kept for longer than is necessary for its given purpose
- f) data is processed in a manner that ensures appropriate security of personal data including protection against unauthorised or unlawful processing, accidental loss, destruction or damage by using appropriate technical or organisation measures
- g) we comply with the relevant GDPR procedures for international transferring of personal data

B) TYPES OF DATA HELD

We keep several categories of personal data on our students in order to carry out effective and efficient processes. We keep this data in a personnel file relating to each student and we also hold the data within our computer systems.

Specifically, we hold the following types of data:

- a) personal details such as name, address, address when residing in the UK, phone numbers
- b) name and contact details of your next of kin
- c) your gender, information of any disability you have or other medical information
- d) right to study documentation, including type & expiry date (we do not keep copies of passports on file)
- e) information on your race and religion for equality monitoring purposes and host placement
- f) information gathered via the enrolment process
- g) details on your education and employment history etc
- h) information relating to your study with us, including:
 - i) your wider terms and conditions of study
 - ii) details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records where appropriate, attendance records and performance information
- i) IT equipment use and internet access.

C) COLLECTING YOUR DATA

You provide several pieces of data to us directly during the enrolment process and subsequently upon the start of your study.





In some cases, we will collect data about you from third parties, such as student agencies, former schools when gathering references or credit reference agencies. Personal data is kept in files or within the IT systems.

D) LAWFUL BASIS FOR PROCESSING

The law on data protection allows us to process your data for certain reasons only. In the main, we process your data in order to comply with a legal requirement or in order to effectively manage the contract we have with you, including ensuring you are taught correctly.

The information below categorises the types of data processing we undertake and the lawful basis we rely on.

Activity requiring your data	Lawful basis
Carry out the student - school contract that we have entered into with you e.g. using your name, contact details, education history, information on any disciplinary, grievance procedures involving you	Performance of the contract
Carrying out checks in relation to your right to study in the UK	Our legitimate interests
Making reasonable adjustments for disabled clients	Legal obligation
Making level and enrolment decisions in relation to both initial and subsequent teaching and host family allocations	Our legitimate interests
Ensuring efficient administration of contractual benefits to you, eg changes of level and service to you as a client	Our legitimate interests
Effectively monitoring both your progress, including timekeeping and attendance.	Our legitimate interests
Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained	Our legitimate interests
Implementing grievance procedures	Our legitimate interests
Assessing needs in your education	Our legitimate interests
Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments	Our legitimate interests
Gaining expert medical opinion when making decisions about your fitness for study/playing	Our legitimate interests
Dealing with legal claims made against us	Our legitimate interests
Preventing fraud	Our legitimate interests
Ensuring our administrative and IT systems are secure and robust against unauthorised access	Our legitimate interests





E) SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- a) health
- b) sex life
- c) sexual orientation
- d) race
- e) ethnic origin
- f) political opinion
- g) religion
- h) trade union membership
- i) genetic and biometric data.

We carry out processing activities using special category data:

- a) for the purposes of equal opportunities monitoring
- b) in our sickness absence management procedures
- c) to determine reasonable adjustments

Most commonly, we will process special categories of data when the following applies:

- a) you have given explicit consent to the processing
- b) we must process the data in order to carry out our legal obligations
- c) we must process data for reasons of substantial public interest
- d) you have already made the data public.

F) FAILURE TO PROVIDE DATA

Your failure to provide us with data may mean that we are unable to fulfil our requirements for entering into a contract with you. This could include being unable to offer you a place or progression on the programmes.

G) CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate if you do work with us as an intern and where the law permits us. This data will usually be collected at the recruitment stage as you apply for an internship, however, may also be collected during your time with us. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of legal requirement to process this data.





H) WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of enrolment onto programmes, including host allocation and the carrying out of performance related procedures will have access to your data which is relevant to their function. All employees with such responsibility have been trained in ensuring data is processing in line with GDPR.

Data is shared with third parties for the following reasons:

1. For host allocation (name, contact telephone number and travel arrangements)
2. Feedback to agents

We may also share your data with third parties as to comply with a legal obligation upon us. We have a data processing agreement in place with such third parties to ensure data is not compromised. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

We may share your data with bodies outside of the European Economic Area if we are reporting back to you agent or school and they reside outside of the EEA. We have put the following measures in place to ensure that your data is transferred securely and that the bodies who receive the data that we have transferred process it in a way required by EU and UK data protection laws:

1. Agency agreement with any agent representing or processing data for IH Manchester
2. Consent by you, the student, to share this information

I) PROTECTING YOUR DATA

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction and abuse. We have implemented processes to guard against such.

J) RETENTION PERIODS

We only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Some data retention periods are set by the law. Retention periods can vary depending on why we need your data, as set out below

Record	Recommended Retention Period
Application & registration forms	3 years after leaving the school
Assessments under health and safety regulations and records of consultations with safety representatives and committees	Permanently
Attendance records	3 years after leaving the school
Reports and progress records	3 years after leaving the school
Personnel files, training records (disciplinary records)	6 years after end of employment





**International
House
Manchester**

K) AUTOMATED DECISION MAKING

Automated decision making means making decision about you using no human involvement e.g. using computerised filtering equipment. No decision will be made about you solely on the basis of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

L) STUDENT RIGHTS

You have the following rights in relation to the personal data we hold on you:

- a) the right to be informed about the data we hold on you and what we do with it;
- b) the right of access to the data we hold on you. More information on this can be found in the section headed “Access to Data” below and in our separate policy on Subject Access Requests”;
- c) the right for any inaccuracies in the data we hold on you, however they come to light, to be corrected. This is also known as ‘rectification’;
- d) the right to have data deleted in certain circumstances. This is also known as ‘erasure’;
- e) the right to restrict the processing of the data;
- f) the right to transfer the data we hold on you to another party. This is also known as ‘portability’;
- g) the right to object to the inclusion of any information;
- h) the right to regulate any automated decision-making and profiling of personal data.

More information can be found on each of these rights in our separate policy on data rights under GDPR.

M) CONSENT

Where you have provided consent to our use of your data, you also have the right to withdraw that consent at any time. This means that we will stop processing your data.

N) MAKING A COMPLAINT

If you think your data rights have been breached, you are able to raise a complaint with the Information Commissioner (ICO). You can contact the ICO at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF or by telephone on 0303 123 1113 (local rate) or 01625 545 745.

O) DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is:

Michael Brennan
Michael@ihmanchester.com

