PRIVACY NOTICE

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

This notice applies to current and former individuals associated with IH Manchester.

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:

- processing is fair, lawful and transparent
- data is collected for specific, explicit, and legitimate purposes
- data collected is adequate, relevant and limited to what is necessary for the purposes of processing
- data is kept accurate and up to date. Data which is found to be inaccurate will be rectified or erased without delay
- data is not kept for longer than is necessary for its given purpose
- 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
- we comply with the relevant GDPR procedures for international transferring of personal data, however we do not transfer employees data internationally.

TYPES OF DATA HELD

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

Specifically, we hold the following types of data:

HOSTS

- personal details such as name, address, phone numbers
- personal details on people living in the house (lodgers, adult children, partners)
- information gathered via the recruitment process such as past hosting record, references from former employers, details on your employment history.
- details relating to pay administration such as bank account details
- medical or health information
- DBS disclosure of every adult living in the home
- information relating to your hosting with us, including:
    - description of your home (including photos)

- documents, forms and information supporting your hosting application and your wider terms and conditions of hosting
- details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings
- Identification documentation
- Dates of last gas safety inspection certificate

STAFF

- personal details such as name, address, phone numbers
- information gathered via the recruitment process such as that entered into a CV or included in a CV cover letter, references from former employers, details on your education, employment history, qualification certificates and proof of right to work.
- details relating to pay administration such as National Insurance numbers, bank account details and tax codes
- medical or health information
- information relating to your employment with us, including:
  - job title and job descriptions
  - your salary
  - your wider terms and conditions of employment
  - details of formal and informal proceedings involving you such as letters of concern, disciplinary and grievance proceedings, your annual leave records, appraisal and performance information
  - internal; and external training modules undertaken
  - information on time off from work including sickness absence, family related leave etc
- IT equipment use including telephones and internet access.

STUDENTS

- personal details such as name, address, phone numbers, email
- information gathered via the application process such as school reports, references.
- medical or health information including next of kin
- information relating to your programme with us, including:
  - travel dates
  - flight details
  - nationality
  - parents details & consent where needed (Under 18s)

COLLECTING YOUR DATA

You provide several pieces of data to us directly during the recruitment period and subsequently upon the start of your commencement of study or employment. In some cases, we will collect data about you from third parties, such as agencies, former employers when gathering references or credit reference agencies.

Personal data is kept in files or within the Company's IT systems.

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 paid correctly or taught correctly.

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

HOSTS

Activity requiring your data	Lawful basis
Carry out the contract that we have entered into with you e.g. using your name, contact details, information on any disciplinary, grievance procedures involving you	Performance of the contract
Ensuring you are paid	Performance of the contract
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to student allocation	Our legitimate interests
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Effectively monitoring both your conduct performance as a host	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 training needs	Our legitimate interests
Gaining expert medical opinion when making decisions about your fitness for work	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
Ensuring safety of our students (gas certs, insurance, driving licence etc)	Legal obligation
Ensuring suitability to host (DBS)	Legal obligation

STAFF

Activity requiring your data	Lawful basis
Carry out the employment 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
Ensuring you are paid	Performance of the contract

Ensuring tax and National Insurance is paid	Legal obligation
Carrying out checks in relation to your right to work in the UK	Legal obligation
Making reasonable adjustments for disabled employees	Legal obligation
Making recruitment decisions in relation to both initial and subsequent employment e.g. promotion	Our legitimate interests
Making decisions about salary and other benefits	Our legitimate interests
Ensuring efficient administration of contractual benefits to you	Our legitimate interests
Effectively monitoring both your conduct, including timekeeping and attendance, and your performance and to undertake procedures where necessary	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 training needs	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 work	Our legitimate interests
Managing statutory leave and pay systems such as maternity leave and pay etc	Our legitimate interests
Business planning and restructuring exercises	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

STUDENTS

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	Legal obligation
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

SPECIAL CATEGORIES OF DATA

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.
- We carry out processing activities using special category data:
- for the purposes of equal opportunities monitoring
- to determine reasonable adjustments
- to ensure correcting matching of student to host
- in our sickness absence management procedures
- Most commonly, we will process special categories of data when the following applies:
- you have given explicit consent to the processing
- we must process the data in order to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

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 of with you. This could include being unable to offer you students to host, being unable to offer you employment, or administer contractual benefits.

CRIMINAL CONVICTION DATA

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your time as a host. We use criminal conviction data to determine your suitability, or your continued suitability for the role. We rely on the lawful basis of our legitimate interests to process this data.

WHO WE SHARE YOUR DATA WITH

Employees within our company who have responsibility for recruitment, administration of payment and contractual benefits and the carrying out 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:

- For the administration of payroll (bank details)
- Completion of DBS checks
- To students/Agents prior to arrival for use in visa application and to make travel/arrival arrangements.
- Payment of tax and National insurance
- Payment of pension plans through the company pension provider (Scottish Widows)
- Compliance during external inspections

We may also share your data with third parties for other reasons 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.

If we have to share your information with bodies outside the UK we would have asked for your consent to do so. This would be for the purposes of student allocation and visa application of the student. Please see our privacy policy for more on cross boarder data sharing.

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.

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 enrolment or employment with us though in some cases we will keep your data for a period after your relationship with us 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	Statutory Retention Period
Children/young adults	Until the child reaches 21

Retirement Benefits Schemes	6 years from the end of the scheme year
Statutory Maternity Pay (calculations, certificates, medical evidence)	3 years after the end on the tax year in which the period ends
Wage/salary (overtime, bonuses, expenses)	6 years
National Minimum Wage	3 years after the end of the consequent pay reference period
Working hours	2 years after working

Record	Our Retention Period
Application forms and interview notes	6 months
Assessments under health and safety regulations and records of consultations with safety representatives and committees	Permanently
Personnel files, training records (disciplinary records, working time records)	3 years after end of hosting
meeting minutes	Permanently

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
Visa/right to study records	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

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.

A PERSONS RIGHTS

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

- the right to be informed about the data we hold on you and what we do with it;
- 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”;

- 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';
- the right to have data deleted in certain circumstances. This is also known as 'erasure';
- the right to restrict the processing of the data;
- the right to transfer the data we hold on you to another party. This is also known as 'portability';
- the right to object to the inclusion of any information;
- 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 protection policy – Host Families under GDPR.

CONSENT

Where you have provided consent to us to 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.

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.

DATA PROTECTION COMPLIANCE

Our appointed compliance officer in respect of our data protection activities is: John O'Leary