



## **Privacy Notice (how we use student information)**

At Skool Cornwall Ltd we take data protection and the privacy rights of our students extremely seriously and we comply with the GDPR. This policy sets out the basis on which any student information will be collected, stored and shared by Skool Cornwall Ltd.

Skool Cornwall Ltd determine the purposes for which and the manner in which any personal data are, or are to be processed.

The categories of student information that we collect, hold and share include:

- Personal information (such as name, email addresses,, phone numbers, address (and passport information where appropriate).
- Characteristics (such as language, nationality, country of birth)
- Attendance information (such as sessions attended, number of absences and absence reasons)
- Relevant medical information
- Emergency contact information (names, phone numbers, email addresses)
- Travel information
- Bank information
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### **Why we collect and use this information**

We use the student data:

- to support student learning
- to monitor and report on student progress
- 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
- for marketing purposes. We use nationality statistics, course length statistics and age statistics only for marketing purposes. Please see 'Why we share student information' for how we use student photos.)
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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.

### **Collecting student information**

Whilst the majority of student information provided to us is required, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain student information to us or if you have a choice in this.

### **Storing student data**

We hold student data for a maximum of two years on an encrypted database and in electronic registration folders on our network servers which only approved members of the school staff have access to. After two years the database automatically anonymises any data held on the system relating to the student that could be used to personally identify them. Eg. name, date of birth, passport information.

After two years any student data held in the registration folders on our network is manually deleted. After this two year period we keep records only of the dates of attendance and student nationality on our database to form the basis of figures for Quality Development planning within the school and figure analysis.

Any data that is recorded on paper at any time during the registration process is securely shredded when the data has been inputted onto the database and our network. Recording student data on paper is discouraged and it is never stored for longer than necessary.

### **Who we share student information with:**

We routinely share student information with:

- Inspectorate organisations including The British Council.
- UK Visas and Immigration upon request.
- Educational Tour Organisers and Educational Consultants who work with ELC to send students to the school.
- Host families/Self-Catering accommodation providers.
- Our student database creator and manager, Red Pesto.
- Taxi/meet and greet companies who provide student airport transfer services.
- Photos of students taken at social programme events and at school are shared on the schools social media sites, including Facebook, Twitter and Instagram.

Skool Cornwall Ltd never shares student information for marketing purposes with third party marketing companies under any circumstances.

### **Why we share student information**

We do not share information about our students with anyone without consent unless the law and our policies allow us to do so.

We are required to share student information for routine inspections by organisations such as The British Council or UK Visas and Immigration as referenced in the list above ('Who we share student information with').

We are also required to share student information for safeguarding purposes when necessary, for example if there is a welfare issue that would require the police to be involved.

We share student information with the Educational Tour Organisers or Educational Consultants who may have sent us the student information originally in order to enrol the student in the school. We share student information with professional organisations such as English UK to develop best practice within our industry.

If students request that the school makes accommodation arrangements on their behalf as part of their enrolment with the school, we will share student information with the homestay/self-catering accommodation providers. Please see our Accommodation Provider Privacy Policy for more details about this.

Skool Cornwall Ltd uses student photos, nationality statistics and age statistics to provide information and show the school environment to other prospective students. We do not share any other student information with third parties.

The school is promoted through our website and through a brochure which is produced in house by the school. The brochure is available on our website for public access and download. This brochure is also shared with Educational Tour Organisers and Educational Consultants who work with Skool Cornwall Ltd to recruit students for the school, as well as members of the general public who request a copy either in person (by coming into the school building to make an enquiry) or via email or telephone enquiry.

The brochure includes photos of students of the school. Student's photos are only used in this way after we have obtained direct consent from the student before taking the photos, and as per data compliance laws, should the student request that we no longer use this photo all reasonable steps will be taken to fulfil this request.

### **Requesting access to your personal data**

Under data protection legislation, students and the parents of students under the age of 18 have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's information, contact [toby@skoolcornwall.com](mailto:toby@skoolcornwall.com) or the school office via telephone on 44 (0)1872 719260.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations
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If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance and we will take all reasonable steps to assist you. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Contact**

If you would like to discuss anything in this privacy notice, please contact the school.