

IPC follows the guidance set out in the General Data Protection Regulation

The 7 principles of the GDPR are explained below

1. Lawfulness, fairness and transparency

We will obtain data on a lawful basis, leave the individual fully informed and keep our word.

The concept of lawfulness states that all processes we have that in any way relate to the personal data of EU citizens must meet the requirements described in the GDPR. That includes data collection, data storing and data processing. The legislation has directions and norms for every step of the data management policy.

Fairness means that our actions – whether a data controller or a data processor – must match up with the way they were described to the data subject. **Simply put, we must keep the promise we made to our client in the notice before collecting the data. We will use personal data only for the purposes we indicated - this is to assist the smooth running of our courses.**

We will give our clients clear notice of why we need their personal data and what we intend to do with it. We must then only use it for the purpose we described.

2. Purpose limitation

We will be specific with our clients about why we are collecting their personal data and we will explain what the data will be used for. We will explain that it will be stored securely and never used for purposes beyond our intended purpose in efficiently delivering our service to the client.

3. Data minimization

We will collect the minimum amount of data required to provide our service.

4. Accuracy

We will make sure that the data we are storing is accurate and up to date.

5. Storage limitations

We will only store data for as long as we need to use it unless clients have agreed to have their contact information kept on file for the purpose of informing them of future events organised by the school. Otherwise we will delete data that we are no longer using for the purpose of delivering our service.

6. Integrity and confidentiality

Secure storage of data. We will keep our data securely in our bespoke system. Where possible data will only be stored electronically. Hard copies of data will be stored securely behind three locked doors from potential data breach.

7. Accountability

We will ensure that storage of data is managed according to the requirements of the GDPR and that we are transparent and accountable to those responsible for monitoring compliance.

The context at IPC

Students

IPC deals with the personal data of our staff, our course participants and the homestay hosts who provide accommodation for our students.

We require this data to assist the smooth running of our programmes and to satisfy the requirements of the British Council Accreditation Scheme criteria by which we are judged and under which we are accredited for the provision of English language training.

We collect specific data items for each of our course participants in order to be able to operate a sensible and efficient enrolment system. The data we collect populates our systems and allows us to store data that we might need in an emergency to support course participants.

We provide forms for course participants to complete and we record the data they provide on our systems. We inform course participants that we are using this data on our systems. We explain that this data may be shared with teachers, guides and homestay hosts in order to improve the quality of their experience in Exeter.

We explain that we might contact course participants in future using their contact information in order to inform them about our products and services. We explain that we will never share this data with a third party.

When asked to share personal information we hold for our own staff we will always ask staff members or freelancers first. For example if a course participant asks for the contact details of a teacher or guide or another member of our team, we will never pass this on before checking with that team member.

In practice sharing of information between staff and (adult) students is a positive thing as it generally indicates that our courses have been well received. In practice some people are more relaxed about sharing data than others.

Homestay Hosts

We store information about our homestay hosts as their service is an integral part of our course provision. We store specific data elements including names, address, contact details, information about the home, pets etc. We also store bank details in order to facilitate payment of hosts. We also store public record data eg. DBS number.

Hosts understand that we will share their personal information with the students who will stay with them and with other students in a group if we are providing one accommodation list for a group – this list goes to a group organiser who shares it with a group of students.

We do not delete information about hosts from our system until they inform us that they want to be deleted. We have costs in recruiting new hosts and we need a good number of hosts available to facilitate our work. Hosts may stop hosting for a period due to personal circumstances and then return to hosting. Periodically we write to hosts to ask if they are happy for us to keep their data on file in case they decide to host again in the future.