|  |  |
| --- | --- |
| **ST ANDREW’S COLLEGE POLICY DOCUMENT** | |
| Issue No.: 01 | Document Number: STAN: 001019 |
| Issue Date: October 2018 | Originator: Beth Rattley |
| Version: 03 | Responsibility: Wayne Marshall/Beth Rattley |
| Reason for version change: Review & Update | Dated: October 2020 |
| Authorised by: Wayne Marshall  Date: October 2020 | Wayne SignatureSignature |

PRIVACY POLICY

This Privacy Policy explains how St Andrew’s Tutorial Services Limited collect, use and process your personal data as well as ensuring the data is kept confidential.

St Andrew’s Tutorial Services Limited is registered in England with company number 01835460 and is owned by Mervyn Martin and his family. We provide GCSE, pre-A Level, A Level, Foundation and IELTS preparation courses. We have courses available for students aged 14+.

Our website is [**http://www.standrewscambridge.co.uk**](http://www.selectenglish.co.uk/). You can contact us by emailing [registrations@standrewscambridge.co.uk](mailto:registrations@standrewscambridge.co.uk), calling 01223 323 718 or using our [Website Contact Form](https://www.standrewscambridge.co.uk/contact/)

**This policy sets out the following;**

* The type of information we collect from you when you visit our website
* The personal information we collect when you complete our forms, how this is processed, stored, shared and managed
* Legal information regarding your data
* Our contact details

**Website Information**

There are two types of information that our website collects. The first is statistical information which is collected as you browse our site and the second is personal information which you knowingly give to us by completing a contact form, course booking form or newsletter sign up.

Our website was built and is hosted by [Design Monkey Media Limited.](https://www.design-monkey.co.uk/)

We do not guarantee that our website will be free from bugs or viruses.

Our website may contain links to other websites. We are not responsible for the content of other people’s sites and therefore, it is recommended that you review their privacy policies before providing any personal information on those websites.

**Statistical Information**

Our website will collect usage information as visitors browse our website via Google Analytics. Google Analytics will collect information such as the number and frequency of visitors to our website. The data that cookies collect allows us to see how people use our website and helps us to make changes to our website that will improve user experience. The data collected is used in an aggregated and non-personally identifiable way.

It uses what are known as persistent and session cookies. Persistent cookies contain a unique number and can tell us if you have visited our website before. They do not collect any personal data about you or provide us with a means to contact you.

Session cookies are used to collect information about your current visit. They will show us if you have interacted with our website in any way such as completing a form or online test. These cookies are deleted as soon as you close your browser window.

Most browsers are set to automatically accept cookies, but it is possible to refuse cookies or change your preferences regarding cookies in the settings menu of your browser.

**Personal Data**

Personal data is information relating to an individual that allows them to be identified.

We collect personal data from students, parents and guardians, homestay hosts, employees, job applicants and education agents.

We only request information from you that we need in order to provide a service to you or comply with the law and regulations. We will only use your data for the purpose for which it was collected.

We will sometimes need to share your information with third parties, but only share information that is required.

Any data we hold is stored on our servers at our Station Road site. We take appropriate technical and organisational measures to prevent unauthorised access, disclosure or alteration to your personal data.

Our data is collected through forms, including those we send to you via email, online forms (using [Microsoft Forms](https://support.office.com/en-us/article/security-and-privacy-in-microsoft-forms-7e57f9ba-4aeb-4b1b-9e21-b75318532cd9)) or the forms below that you can complete on our website:

* Website Contact Form (see below)
* Online Course Application Form (see ‘Students’ section)
* Online Consent Form (see ‘Students’ section)
* Online Care of Under 18s Form (see ‘Students’ section)
* Online Medical Form (see ‘Students’ section)

**Website Contact Form**

This form will be emailed to our Admissions Department who will respond to your enquiry. Your information will not be recorded in any way and will not be kept on file.

**Please see the relevant section below for more details on the data we collect from you, the reason for this, as well as how the data is stored and shared.**

**Students (and parents/guardians when necessary)**

The only information we collect about you will be information you choose to provide us with.

Any information we ask for is required to book you on the course you have requested and provide it to you with utmost consideration for your safety and welfare, as well as that of other students.

We rely on the following legal bases to process your data:

* **Legitimate interests:** we need certain information about you in order to determine whether you are suitable for our courses and respond to your request.
* **Performance of a contract:** once you have chosen to book a course with us, we need to ask for specific information about you in order to provide the course, and in order to take payment for the course
* **Legal obligation:** we require some data in order to keep you and other people safe and to comply with laws and regulations governing this
* **Vital interests:** we may need to use your data in an emergency when life is at risk, for example in a medical incident

We do not usually rely on the basis of consent to process your data; when this is the case we will always ask you clearly and you will have the right to withdraw your consent at any time.

We sometimes receive information on prospective students from education agents. This data is not processed by Select English unless a formal application is made.

**The forms we ask students/parents to complete are as follows:**

Registration Form

Parental Consent Form

Medical Questionnaire

Care of Under 18s Form

Depending on a student’s age, there are different documents that are required.

Below is a summary of the personal data we collect from you and the reason this is needed.

**Full name:**  
To identify you and book you on a course  
**Sex:**For accommodation placement  
**Nationality:**To ensure a mix of nationalities on each course, to accommodation students in homestays, residences and dormitories with students from other countries  
**Age and Date of Birth**To confirm that you are eligible for the course and ensure that the right safeguards are in place for you.  
**Email Address:**To send booking, pre-arrival and transfer confirmation  
**Contact Numbers:**  
To contact you for missing information such as flight details for us to arrange airport transfers, to contact you in the event of an emergency  
**Passport Information:**To prove identity, to demonstrate eligibility to study in the UK, to allow us to provide you with documents to assist with an application for a study visa or Tier 4 visa. You may also be required to supply a copy of your birth certificate for the same reason.  
**Information regarding health, allergies, educational needs:**To ensure your welfare, health and safety, to enable us to respond to any related issues in an informed manner, to enable us to make any advance preparations such as buying food for special diets

**Name of previous school, dates attended and grades.**

To determine your eligibility for the course. You may also need to provide copies of your academic transcripts.

If you need to update your personal information with us at any time or there is any mistake in any confirmation documents we send you, please email David (david@standrewscambridge.co.uk) who will alter your records accordingly.

We sometimes need to share information with other people in order to deliver our courses to you.

If you are staying in a homestay or residence we will share necessary personal data with your host or house manager – this includes your name, date of birth, nationality and any relevant medical information.

We use [Airport Lynx](https://www.airportlynx.co.uk/) for individual transfers to and from the airport. We provide them with your name and contact number when you provide your flight details to book a transfer.

The data you provide us with will be stored on the school database (Engage). The database is password protected and stored and backed up on a secure server.

**Homestay Hosts** **(and your family members where appropriate)**

We rely on the basis of Legitimate Interests to process your data initially– we need to know your name, address, email address and contact number to determine whether you are suitable for hosting.

We also rely on the basis of “Performance of a Contract” once an agreement has been made– we need to process further information about you (e.g. your date of birth, bank details, nationality) in order to allow students to stay with you, and in order to pay you for this service.

In addition to the data above, we need to record your date of birth, sex, passport number and nationality in order to run a DBS check to comply with the law, this is a “Legal Obligation”. We also request criminal record information to comply with the 1989 Children Act.

Your data will be stored on our server, as well as on our school databases (Class). Your details may also be kept in a physical document which is stored in a locked filing cabinet.

We will share your name, address and contact number with students who will be hosted by you, their education agents (where applicable, as they sometimes pass on information to parents and students) and the transport provider providing the student(s)’ transfer to/from your home.

Your data will be stored on our school database (Class). The database is password protected and stored and backed up on a secure server.

**Education Agents**

We record the name, email address, company contact number and company address of our partner agents in our school databases (Class an Engage) and rely on the legal basis of “Performance of a Contract” to process your data.We rely on the legal basis of “Legitimate Interests” when contacting prospective agents as we believe a potential partnership may be beneficial for both parties.

Your data will be stored on the school databases (Class and Engage). The database is password protected and stored and backed up on a secure server.

Under data protection legislation, we believe that we have a legitimate interest in using your data for some marketing purposes. This may include sending you information about new courses or offers. We may also send a copy of our brochure to your postal address. You can choose not to receive any marketing correspondence from us by emailing [Sam Gross](mailto:sam.gross@selectenglish.co.uk). Your details will be removed from our database.

**Job Applicants**

We rely on the basis of “Performance of a contact” when you apply for a position at the school – we need certain information from you in order to consider you for a position.

We process special category data such as data relating to race, ethnic origin and health in accordance with employment law to protect appropriate safeguards.

Your personal data will be stored securely and only entered onto our database if you proceed to work for the company.

**Employees**

We rely on the bases of “Legal Obligation”, “Performance of a Contract” and “Legitimate interests” to process personal data about employees.

We require all data we request in order to run the company, ensure a safe environment, make payments and meet legal requirements.

Employee data may be shared with Regulatory bodies (e.g. British Council) to comply with inspections, other providers (e.g. for pensions and payments) and those relevant for security/referencing purposes. We may also need to share your data in an emergency to protect vital interests.

Your data will be stored on the school’s server and CRM. If paper copies are held these will be kept securely in a locked cabinet.

### **How long do we keep your data?**

We do not have a singularly defined period for keeping your data as we collect data for many different purposes. For each individual category of data, we have a timeframe within which we keep your data, and these are stated in our Data Protection Policy.

### **Legal Information**

Under the Data Protection Act 2018 the data controller is Under the Data Protection Act 1998 the data controller is St Andrew’s Tutorial Services Limited. St Andrew’s Tutorial Services Limited is wholly responsible for protecting your data.

You have the right to contact us in writing and request any information we hold about you. You can also request for us to delete your record, restrict processing or object to processing. Will we do this if there are no other reasons why we need to keep the information such as a legal requirement. We need to be certain that we are communicating with the person that the data belongs to, and therefore, may request ID in order to carry out your request.

It is important for all data we have about you to be correct – please inform us if you would like to update your data or correct existing records.

If you have any questions about your data or you wish to make a complaint, please contact us. The Privacy Lead will deal with the request and it will be responded to within a reasonable period which will be no longer than 28 days. If you are dissatisfied with the way your request was handled, you have the right to lodge a complaint with the supervisory authority. The details are below;

Information Commissioner’s Office

<https://ico.org.uk/concerns/>

Tel: 0044 303 123 1113

### **Changes to our privacy policy**

This policy will be reviewed annually. If changes occur over the course of the year these will be added, and a dated note placed in the footer of this page. Note: changes were made on 16/10/2019 adding more information for employees, homestay hosts and education agents.

**CONTACT**

If you have any questions regarding this policy or regarding your privacy you can contact [**Beth Rattley**](https://www.standrewscambridge.co.uk/privacy-policy-2/elizabeth.rattley@selectenglish.co.uk) Tel: 01223 313211 or the college Principal Wayne Marshall [**wayne.marshall@standrewscambridge.co.uk**](mailto:wayne.marshall@standrewscambridge.co.uk)Tel: 01223 323718