



Cavendish School of English Data Protection and Privacy Policy

Cavendish School of English is committed to protecting the privacy of all who connect with us, and therefore operates under all applicable laws to protect personal and sensitive information.

This privacy notice tells you:

- Who we are
- Who we collect information from and about
- What information we collect
- How this information is collected
- Why this information is collected
- How we use this information
- Who we share this information with
- What your rights are, and how you can exercise these rights.

The processing of personal data is governed by the General Data Protection Regulations. GDPR categorises data as personal information and sensitive personal information; we collect both types of data and recognise the need to have at least one lawful basis for every piece of data we process.

Cavendish School of English complies with GDPR by:

- Being open and transparent about the data we hold.
- Identifying a lawful basis for the processing of all data we hold.
- Allowing people access to the data we hold about them.
- Keeping personal data up-to-date and accurate.
- Storing data securely and restricting access to it.
- Collecting only data that is necessary.
- Destroying data securely after an appropriate length of time.
- Respecting the rights held by each data subject.

Who we are:

Cavendish School of English is a limited company, registered in England and Wales, under company registration number 03010012.

The school was founded in 1983. We provide English language lessons for international students, and are frequently asked to organise accommodation, leisure, and transport services for our customers and those associated with them.

Cavendish School of English acts as a data controller; this means that we decide how and why personal data is stored and used.

Who we collect information from and about

We collect information from and about:

- Our students.
- Our accommodation service providers.
- Our leisure service providers.
- Our transport service providers.

We also collect the same information from anyone who applies for one of these positions, regardless of whether they complete or cancel their application, are successful or not.

What information we collect

We only collect, store, and use information that is given to us openly and voluntarily; we do not collect information about without prior knowledge or consent. We do not collect any location-based data.

We collect personal data and sensitive personal data.

Our students:

When you book a course with us, we ask for the following information:

A. Personal information, including: your name, date of birth, gender, nationality and mother tongue, and photograph of ID and consent forms.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT and LEGITIMATE INTERESTS: your information is used to give the professional and personal service that you would expect from a language school, including the provision of anonymised statistical information about our student demographic.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times. Where necessary for the day-to-day running of the school, for example in the creation of an attendance register, this information may be printed and used by staff in a physical form and as appropriate.

WHO WE SHARE THIS INFORMATION WITH

This information is shared with employees who have a need to access the information; all teachers will therefore have access to your name, nationality, mother tongue, and age.

B. Contact information, including and limited to: your mobile telephone number, email address, residential address both in the UK and in your home country.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT, LEGITIMATE INTERESTS, and LEGAL OBLIGATION: we use your telephone number to let you know of any last-minute changes to your timetable and in case of emergency; we use your email address to send information about your course, and we must keep an up-to-date record of residential addresses to meet our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information can be accessed by those who have authority to view your student file; the information is only shared with third parties who provide associated services that you ask us to organise for you. We will therefore share this information with accommodation, exam, leisure, and transport service providers if you book one of these services.

C. Emergency contact information, including and limited to: your chosen next-of-kin, their relation to you, and a contact telephone number and email address for them.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of LEGAL OBLIGATION: we are required to hold this information in order to meet our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information is never transferred, but may be accessed in a secure environment by staff who are responding to a health or welfare concern.

D. Migration information, including and limited to: your passport number and your visa status, type, and expiry date.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT and LEGAL OBLIGATION: we must include your passport number on any immigration support letter, and must record visa information to meet our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information is never transferred, but may be accessed in a secure environment by regulators who are required to see evidence of your immigration status and right to study.

E. Health and welfare information, including and limited to: any allergies you have, any medical conditions that we should be aware of, any food or drink that you cannot have, any medicine that you must take, any medicine that you must not take, and whether or not you smoke.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONSENT and LEGAL OBLIGATION: it is not necessary for you to give us this information if you are an adult, but we must have this information in order to correctly safeguard any student under the age of 18.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information may be accessed in a secure environment by staff who are responding to a health or welfare concern. This information will be shared with selected accommodation providers if you book homestay accommodation through the school. In case of emergency or risk to your health, this information will also be shared with medical professionals in attendance.

Our accommodation service providers (homestay families)

Anyone expressing interest in hosting our students is asked to provide personal information:

F. A name, a contact number, and an email address

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT: you have asked us to send you an information pack, and so we need to record where it has been sent.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information is not transferred to a third party, and is only accessed by appropriate members of staff in order to follow-up on your interest.

If you decide to apply to become a host, we will ask for the following information:

G. Personal information, including and limited to: the full postal address where you propose to host students, as well as the name, gender, date of birth, and occupation of all residents

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

Your information will be accessed by appropriate members of staff in order to manage your registration, will be shared with any guest booking that you accept, including their professional representative, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

H. Contact information, including: two or more contact telephone numbers and one email address appropriate for accommodation matters.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT: in order for us to accept your application, we will need to contact you so that we can organise student placements effectively.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

Your information will be accessed by appropriate members of staff in order to manage your registration, will be shared with any guest booking that you accept, including their professional representative, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

I. A name and email address for two referees

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your registration, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

If your application is successful, we will require the following further information:

J. Bank details.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations, as well as to remunerate you for bookings accepted.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your registration, and may be accessed in a secure environment by regulators who are required to see evidence of our records. Your financial information is transferred to our bank, currently Barclays.

K. DBS check

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

Prior to your employment with us, and with your explicit consent, it may be necessary for us to perform a criminal record check in order to obtain a DBS certificate.

Your DBS certificate is your property, and we will not copy it in any way. However, we will keep a note of the certificate number and date of application, along with a note as to whether your DBS record was accepted.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your registration, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

L. Marital status and Gender

WHY WE PROCESS THIS INFORMATION

We store the marital status to give more details about the families to customers, as some customers request families while others request single parents (e.g. female hosts). Also, if a host is a single male, we would not normally allocate junior girls.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

M. Availability

Beds available, dates available, age groups accepted, customer types accepted.

WHY WE PROCESS THIS INFORMATION

We use this information to allocate students to you.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

N. Foods provided

Vegetarian, Halal.

WHY WE PROCESS THIS INFORMATION

To matching students' requirements to homestay families.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

O. Date of Birth

WHY WE PROCESS THIS INFORMATION

We use this for identification purposes and to help satisfy customer requests (e.g. "Would prefer an older family if possible.")

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

P. Foster family status

WHY WE PROCESS THIS INFORMATION

Foster families are allowed to host customers under 16 years old for 28 days or more. We use this information to match customers to families. This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your registration, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

Q. Fire certificate status

WHY WE PROCESS THIS INFORMATION

Is important for customer safety, that all homestay families that look after customers under 18 years old have a current fire safety certificate in place, should one be required. This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your registration, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

R. Number of children

WHY WE PROCESS THIS INFORMATION

This helps us to satisfy customer requests (e.g. "Please no other children in the house" or "I'd like to stay with a family with children please").

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

S. Pets

WHY WE PROCESS THIS INFORMATION

We use this information to avoid placing customers with allergies in homes with pets that might trigger those allergies. We also use this to help satisfy customer requests (e.g. "I would like to stay with a family with dogs").

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

T. Health issues

Diabetic, Vegetarian, Smoker, Disabled.

WHY WE PROCESS THIS INFORMATION

We use allergy and health information to match a customer to a homestay family. The allocation process is semi-automated, but the decision is ultimately made by a human.

We like to put diabetic customers with diabetic homestay families where possible. We believe the shared condition aids with understanding of customers' needs and dietary requirements, as well as being able to recognise diabetic emergencies.

We like to place smokers with families that smoke, as we believe they will be more compatible.

We prefer to place vegetarian customers with vegetarian families where possible.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

U. Internal comments

WHY WE PROCESS THIS INFORMATION

These allow us to see an overview of the family, as well as recording special requirements that aren't so easily categorised (e.g. "Will take males up to 20 years old. Females any age"). This also allows consistency between communications.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

V. "External" comments

WHY WE PROCESS THIS INFORMATION

Our customers like to have an idea of what type of accommodation they will be staying in. The "external" comment is a short paragraph describing the homestay family in a customer friendly manner (e.g. Mrs X is a very experienced host. The large house has four bedrooms and a garden)

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff and may be shared with relevant students and agents in order to manage your accommodation bookings.

W. History of customers allocated

WHY WE PROCESS THIS INFORMATION

We use this information to pay you, to track any complaints, and to be able to satisfy requests from law enforcement. This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings.

X. Last visited date

WHY WE PROCESS THIS INFORMATION

We are legally required to visit homestay families every two years. This information allows that requirement to be fulfilled. This information is processed under the lawful basis of LEGAL OBLIGATION: we need it to comply with our statutory and regulatory obligations.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

Y. Complaints

WHY WE PROCESS THIS INFORMATION

Unfortunately from time to time, we do receive complaints about homestay families. It is important to keep track of those to avoid problems and to satisfy requests from law enforcement.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

Your information will be accessed by appropriate members of staff in order to manage your accommodation bookings, and may be accessed in a secure environment by regulators who are required to see evidence of our records.

YOUR RIGHT TO BE FORGOTTEN

You have the right to be removed from our database. Requests must be made to the school via telephone. Once we have verified your identity, your record will be flagged for anonymization. The anonymization procedure removes all personally identifiable information, whilst allowing statistical analysis. We will keep records for a minimum of 6 (six) months after the last customer has left your home. We need to do this to satisfy any law enforcement requests.

YOUR RIGHT TO YOUR DATA

You are entitled to a copy of the data we keep about you in a machine readable format. Requests must be made to the school via telephone. Once we have verified your identity, an electronic copy of your records will be sent via email within four weeks. There is no charge for this. We reserve the right to charge a nominal fee for repeated requests.

THE DATA WE SHARE

Many foreign embassies require a customer to have accommodation arranged before granting a VISA. To enable customers to enter the country, we have to share a few pieces of information with the agents that represent customers, the customers, and foreign embassies. The information shared is Name, address, and our external comments about a homestay family. This is sent in the form of a headed letter from the school as a paper document sent via post, or as a PDF sent by email.

PROFILING

Our system attempts to find the most suitable homestay family for each customer, taking into account the following factors:

Customer's age, gender, dietary preferences, proximity to other customers in the same group, available space in the homestay, and certain medical conditions (i.e. Diabetes)

OTHER

We do not sell your data. Your contact information is only used as outlined in the above section entitled "The data we share", and to contact you directly. Your information will not be sold or passed on to any marketing companies.

Your data is stored within the EU apart from those occasions where your address may be printed on a letter for foreign embassies.

Our leisure service providers

When the school organises leisure services, two pieces of personal information are processed:

Z. The provider's name and mobile telephone number.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT: we require this information to fulfil a contract between the school and the subcontracted leisure service provider.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information is not shared with any third party and is only accessed by the member of staff responsible for liaising between the school and the leisure service provider.

Our transport service providers

When the school organises transport services, two pieces of personal information are processed:

AA. The driver's name and mobile telephone number.

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT: we require this information to fulfil a contract between our client and the subcontracted transport service provider.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times.

WHO WE SHARE THIS INFORMATION WITH

This information is shared with the client and any representative with a legitimate interest; this is limited to the client's agent, tour organiser, group leader, their parent or legal guardian, and an entry clearance or immigration officer.

AB. List of students, including name, age, gender, allergies

WHY WE PROCESS THIS INFORMATION

This information is processed under the lawful basis of CONTRACT: we require this information to fulfil a contract between our client and the subcontracted transport service provider. The list is provided to ensure no students are lost track of. Allergies are made known in order to quickly respond to medical emergencies.

HOW WE PROCESS THIS INFORMATION

This information is stored in our web-based, and password-protected, database and on our secure email server; both accessed using secure connections at all times. Student lists for transport may be printed.

WHO WE SHARE THIS INFORMATION WITH

This information is shared with the client and any representative with a legitimate interest; this is limited to the client's agent, tour organiser, group leader, and an entry clearance or immigration officer.

How information is collected

All data is collected in one of the following ways:

- If you speak to us in person.
- If you speak to us on the telephone.

- If you send us an email.
- If you fill in a form on our website.
- If you complete our enrolment form.

We are careful to protect personal information at all times.

Our web pages all use a secure connection by default; this can be confirmed by looking for a padlock symbol next to the page or site address. You should not submit any personal information online unless you can trust that a website is using a secure connection.

Any personal information that we hold is stored and accessed using secure connections; all computers are password protected programmes.

Only employees and contractors who need information to perform a specific job are granted access to personally identifiable information.

Why this information is collected

We only have three fundamental reasons for collecting and processing personal information:

- To promote the services that we offer.
- To provide the services that are requested of us.
- To meet our statutory and regulatory obligations.

How we use this information

We have a Data Protection Policy in place to oversee the effective and secure processing of all personal data. The information we collect is required to enter into a contract and, although customers and clients are not obliged to provide their personal data, failure to do so would mean that we would be unable to process their application.

All the personal data we use is controlled by Cavendish School of English and, for the purposes of IT hosting and maintenance, this information is located on servers within the UK and Germany. A secure connection is always used by default whenever data is accessed or transmitted electronically.

We use personal information to give a professional service to those who work with us and for us; this means that we must share certain data with individuals or companies who carry out the services we offer.

We keep personal information for a period of 5 years after an agreement or contract with us finishes. This enables us to professionally manage the frequent requests that we receive after someone has left our school or stopped working with us. Examples of this are:

- Confirming a period of employment.
- Dealing with a subsequent application.
- Evidencing a course of study.
- Providing a reference.

We keep some data indefinitely, but only in an anonymised format and for statistical purposes. As an example, we keep a record of the number of students, the nationality breakdown, any exam results, and any feedback scores.

Although we may remember that a German student passed an exam and gave us excellent feedback, this cannot be used to identify anyone because we do not keep a record of that person's name.

In order to meet our legal requirements in the UK, we keep all financial data for 7 years. However, this data is aggregated and almost completely anonymised.

The only personally identifiable information kept for this period of time is the name associated with any payment made to us.

At the end of the relevant retention period, electronic data is deleted from all systems and hard copies are shredded.

Who we share this information with

Personal and sensitive data is treated in the strictest confidence, and is only shared with people or companies who provide the services that our customers have requested.

We only transfer personal information to a third party if instructed to do so, or if required as a natural consequence of a service requested; if a student asks for homestay accommodation, for example, we will share their data with potential providers.

Specifically, we share personal information with:

- Our staff, so that we can give our customers a professional experience at school.
- Accommodation service providers, so that we can organise a place to stay.
- Leisure service providers, so that we can organise activities.
- Transport service providers, so that we can organise journeys and excursions.

We do not share any personal information until a service that requires the sharing of that information has been requested.

Your rights

Under GDPR, you have the following rights:

The right to be informed: You can understand what data we hold about you, why we need it, and what we do with it by reading this notice.

- The right of access: You can ask us to tell you what data we hold about you.
- The right to rectification: You can ask us to correct the data we hold about you.
- The right to erasure : You can ask us to erase the data we hold about you.
- The right to restrict processing: You can ask us to limit the ways in which we share the data we hold about you.
- The right to data portability: You can ask us to give you all the data we hold about you in a way that will allow you to move it to another place.
- The right to object: You can ask us to stop using your data for specific purposes, such as sending you marketing messages.

You can make any request in writing or just by talking to us; we will give you a lawful response within 28 days. If we cannot, or chose not to, do what you ask, we must give you a lawful reason and explanation for our decision.

The GDPR also has provision on automated individual decision-making and profiling. These terms describe situations where machines process your data without a person being involved; we do not engage in this type of processing.

Contact details

If you want to exercise your rights, as listed above, or make a complaint about how we have handled your personal data, you can contact our School Principal, Nathan Santangelo-Barber:

Cavendish School of English
63 Cavendish Road
Bournemouth
Dorset
BH1 1RA
ENGLAND

Telephone: 0044 1202 770070

Email: info@cavendishschool.com

If you are not satisfied with our response, or believe we are processing your personal data not in accordance with the law, you can report a concern to the Information Commissioner's Office (ICO).