



## Data Policy

Organisation Name: KEW LEARNING LTD

Registered: 22 January 2018

Organisation Address: Wickham House, Upper Teddington Road, Kingston Upon Thames, England, KT1 4DY

Companies House Registration Number: 11162500

Data Protection and Handling Policy

### Data Protection Policy – Kew Learning Ltd

Kew Learning Ltd collects and uses personal information about staff, students, overseas parents, host families and other individuals who come into contact with the organisation. This information is gathered in order to enable it to provide a guardianship service and other associated functions. In addition, there may be a legal requirement to collect and use information to ensure that Kew Learning complies with its statutory obligations.

#### Purpose:

This policy is intended to ensure that personal information is dealt with correctly and securely and in accordance with the Data Protection Act 2018, and other related legislation. It will apply to information regardless of the way it is collected, used, recorded, stored and destroyed, and irrespective of whether it is held in paper files or electronically. All staff involved with the collection, processing and disclosure of personal data will be aware of their duties and responsibilities by adhering to these guidelines.

#### What is Personal Information?

Personal information or data is defined as data which relates to a living individual who can be identified from that data, or other information held.

#### Data Protection Principles

The Data Protection Act 1998 establishes eight enforceable principles that must be adhered to at all times:

1. Personal data shall be processed fairly and lawfully;
2. Personal data shall be obtained only for one or more specified and lawful purposes;
3. Personal data shall be adequate, relevant and not excessive;
4. Personal data shall be accurate and where necessary, kept up to date;
5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose or those purposes;
6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
7. Personal data shall be kept secure i.e. paper files are kept in locked cabinets, and digital files are stored on computer with passwords;
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of data protection.

## General Statement

Kew Learning is committed to maintaining the above principles at all times. Therefore, Kew Learning will:

- Inform individuals why the information is being collected when it is collected
- Inform individuals when their information is shared, and why and with whom it was shared
- Check the quality and the accuracy of the information it holds
- Ensure that information is not retained for longer than is necessary
- Ensure that when obsolete information is destroyed that it is done so appropriately and securely
- Ensure that clear and robust safeguards are in place to protect personal information from loss, theft and unauthorised disclosure, irrespective of the format in which it is recorded
- Share information with others only when it is legally appropriate to do so
- Set out procedures to ensure compliance with the duty to respond to requests for access to personal information, known as Subject Access Requests
- Ensure our staff are aware of and understand our policies and procedures

## Sharing your data

Kew Learning treats all data we hold as confidential. It is always treated with discretion. Data on host families and students is shared with parents, schools and host families only by the sharing of a profile. Host families have the ability to view this profile on their area of the host portal. Should a safeguarding risk or medical emergency occur then data may be shared with local services, such as medical or social care.

As part of AEGIS, Kew Learning will undertake inspection. As part of this process Kew Learning is required to share contact details with the AEGIS appointed inspector and office. Should you wish for your details not be shared with AEGIS please contact – [info@kewlearning.co.uk](mailto:info@kewlearning.co.uk) and we will change your consent accordingly.

## Complaints

Complaints will be dealt with in accordance with Kew Learning's complaints policy.

## Review

This policy will be reviewed as it is deemed appropriate, but no less frequently than every 3 years. The policy review will be undertaken by the Director or nominated representative.

## Reporting a Breach to ICO

Kew Learning is registered with the ICO and the registration number is ZB343711. If there is a breach of data protection, we will contact ICO and follow their guidance to deal with it.

ICO helpline: 0303 123 1113

## What information will Kew Learning provide?

- what has happened;
- when and how Kew Learning found out about the breach;
- the people that have been or may be affected by the breach;
- what Kew Learning are doing as a result of the breach; and
- who ICO should contact if ICO need more information and who else Kew Learning have told.

ICO website: <https://ico.org.uk/for-organisations/report-a-breach/personal-data-breach/>

If Kew Learning can manage the breach of data protection, or are still investigating and will be able to provide more information at a later date, we will report it online.

## Contacts

If you have any enquires in relation to this policy, please contact Min You, who will also act as the contact points for any subject access requests. Further advice and information is available from the government website, [www.gov.uk/data-protection](http://www.gov.uk/data-protection)