

# Data Protection Policy

WE Bridge Academy  
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UK

**Last review:** April 2023/April 2024 (BH)

**Next review:** April 2025

This privacy policy applies between We-Bridge International Ltd, the user of the website and or services provided by We-Bridge International Ltd.

We-Bridge International Ltd takes their customer privacy very seriously. This privacy policy sets out to help you understand how we collect, collate, process, share and destroy your data.

We-Bridge International Ltd identify as the sole data controllers.

### **What data do we collect?**

To provide the best service to our customers, we will collect information to provide you with a service and or goods, invoices, service updates or to provide you with promotional offers.

### **We will collect:**

#### Students (referred to as “customers”)

At application stage: personal information such as name, DOB, address, contact numbers, email address, emergency contact details, passport, education history, parental consent for under 18, health questions, disability questions and signature.

#### Homestays

Personal information such as name, DOB, address, contact numbers, email address, bank details. In case the homestay is hosting under 18s, a DBS check will be required for all the members of the family over the age of 18. Gas certificate, which includes details of the plumber, is required. We also ask for two references that will have contact details of the referees.

## Agents

Personal information such as name, address of the company, contact details, two references (containing details of the referees) and their company registration document.

## Employee

Personal information such as name, DOB, address, contact numbers, email address, emergency contact details, passport, work history, health questions, disability questions and signature. At interview/accept stage we seek passport, right-to-work documents, references, and DBS.

## **Why do we collect this data?**

### Customer

Information is required to process student's application and enrol them onto our courses. Information collected is also required for the Academy to meet its UKVI and inspecting bodies compliance.

### Homestay

Information is required for correspondence and safeguarding. Information collected is required for the Academy to meet its UKVI and inspecting bodies compliance.

### Agents

Information is required to check that agents are genuine and trustworthy. Employee:

Used during the application process to check their right to work in the UK and offer employment. Information collected is required for the Academy to meet its inspecting bodies compliance.

### Customer

We only ask for information that allows us to successfully process an application for study. This also ensures we meet inspection criteria (such as ISI, UKVI etc.)

### Employee

We collect information that allows us to consider making an offer of employment.

### **If you decide not to provide your information**

#### Customer

It's made clear in our policies, our application form and online that we may not be able to provide an offer letter to study if the relevant information is not provided (e.g., an international student being unable to provide a passport).

#### Homestays

If you decide not to provide your details, you will not be able to be considered as a homestay for WE Bridge Academy.

#### Agents

If you decide not to provide your details, we will not be able to register you as an agent for WE Bridge Academy.

#### Employee

It is made clear in our policies, our application form and online, that we may not be able to progress an application if the required information is not provided.

### **Third Party Information**

Definition: They have access to and may collect information only as needed to perform their functions and are not permitted to share or use information for any other purpose. Where we provide data to third party service providers for them to

provide data analysis or statistical services for us, we will only ever send them aggregated, anonymised data. The third-party providers will not share or pass on or even hold your data for longer than necessary to complete the data field transaction to ourselves.

### Customer

Permission to share data with third parties is collected at the application and enrolment stage. We only share necessary information such as details of students to inspecting bodies and their agents.

### Homestays

Permission to share data with third parties is collected at the application. We only share necessary information such as details to the homestay to students, agents and inspecting bodies.

### Agents

Permission to share data with third parties is collected at the application. We only share necessary information such as details of the agency to prospective students and inspecting bodies.

### Employee

Permission to share data with third parties is collected at the application. We only share necessary information such as CVs to universities and colleges where we carry out online teaching.

## **Controlling Use of Your Data**

Where possible we are required to give you the option to restrict use of your data. This will reduce the risk of a data breach for marketing purposes and sharing with third parties.

## **How and where will your data be processed?**

Any information that we hold about you is stored securely and all information, including payment transactions are encrypted. Only authorised personnel are permitted to access personal data during their work. Whilst we do our best to protect your personal data, no information transferred over the internet can be guaranteed to be completely secure and you provide your information at your own risk.

## **CCTV**

Definition: For the security and safety of our customers and staff, we might decide to operate CCTV. All areas under CCTV surveillance are clearly sign posted in accordance with the law. If an incident has occurred in school whilst you are present, we may share the images with the relevant authorities. No unauthorised personnel will have access to your images, and this will not be shared outside of our legal obligations. You have the right to request access to your images captured by CCTV at any time. Please see section on “Your Rights” for more information on how you can do this.

At this current time, we do not operate CCTV. (Subject to change)

## **Security of your information**

We are passionate about keeping your data safe. That is why we have various systems and policies in place to ensure we are a safe haven for your data.

All data stored digitally is done so behind secure passwords and/or two factor authentication. Physical data is stored behind lock and key.

The data protection legislation requires organisations to notify any personal data breach to the Information Commissioner’s Office within 72 hours after becoming aware of the breach and, where there is a high risk to the rights and freedoms of data subjects, to the data subjects themselves. A personal data breach is any breach of security which leads to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data transmitted, stored or otherwise processed and includes any act or omission that compromises the confidentiality, integrity or availability of personal data or the safeguards that we, or our third-party service providers, have put in place to protect them.

The Academy has procedures in place to deal with any suspected personal data breach and you are required to comply with these. If you know or suspect that a personal data breach has occurred, you must immediately contact our Data Protection Officer (Managing Director] and retain any evidence you have in relation to the breach. Please see the Staff Handbook for further information about the procedures to be followed.

## **Marketing**

When you request services with us and you have opted in (or in any other case, if you have opted in to receive marketing by email or text message), we may contact you by e-mail or text message with information about other goods and services that we offer that are similar to those that you have already purchased or enquired about and we think may interest you based on the information we hold about you. We may also use your contact details to contact you by phone or post with details of products and services that we think may be of interest to you (unless you have told us you do not want to receive these communications, or you are registered with the Telephone Preference Service). We will hold your data for a period of 18 months before redefining consent from yourself.

We collect permission online where an individual would have to agree and have the option to unsubscribe at any time.

## **Special Category Data**

We ask for medical information at application and enrolment stage. If any medical information is declared, this will be shared with appropriate members of staff (and homestays if deemed necessary and with the permission of the customer).

## **Improving our services**

Sometimes we will use your data to help us improve the quality and functionality of the services that we offer. This includes:

- Analysing your recent visits to our website and how you move around different sections of our website for analytical purposes to understand how people use our website so that we can make it more intuitive.

- Troubleshooting, data analysis, testing, research and for statistical and survey purposes by us, all of which helps us to provide the best service that we can. Again, this information is not shared.

## **Your Rights**

If you wish to access, correct, update or request deletion of your personal data, you can do so at any time.

You can object to the processing of your personal data, ask us to restrict processing of your personal data or request portability of your personal data.

You have the right to opt-in to marketing communications that we can send to you at any time. You can exercise this right by opting into the marketing e-mails we send you. Similarly, if we have collected and processed your personal data with your consent, then you can withdraw your consent at any time.

Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal data conducted in reliance on lawful processing grounds other than consent.

You have the right to complain to a data protection authority about our collection and use of your personal data. The Information Commissioner's Office is the data protection authority for the UK. You may write to them at: Information Commissioner's Office Wycliffe House Water Lane Wilmslow Cheshire SK9 5AF. Alternatively, you may call them on 0303 123 1113. You may also visit their website to fill out an online complaint form at <https://ico.org.uk/make-a-complaint/>.

## **Destruction**

We will only keep your information for as long as is needed to fulfil our duties or required to do so by law. When we destroy your information, it is done so securely. If we have hard copies containing your data, they will be shredded and disposed of securely when no longer required.



## **Changes to our Privacy Notice**

We may update this Privacy Notice from time to time in response to changing legal, technical, or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.

## **Contact us**

If you have any questions about this Privacy Notice or wish to exercise any of your data protection rights, please contact our Data Protection Officer at:

Email: penny@we-bridge.co.uk

This Privacy Policy was last updated in April 2023

## **Data Protection Impact Assessment**

### 1. What does processing this personal data aim to achieve?

We request and process personal data to successfully accept and enrol students onto our courses. We also request data to help us stay compliant with our accreditors and for inspection purposes.

### 2. What types of processing will this involve?

Most of the data we process is done so securely and digitally. Where there is a need to process hard copies, such information is stored under lock and key (should it need to be retained).

### 3. Why did you feel there was a need to conduct a DPIA?

To identify that the data we process is done so for legitimate cause. It also allows us to ensure we are processing data for the purpose it is intended and lawfully.

### 4. How is the data collected?

Applications received via our website will include digital attachments such as passports, education grades and visas. These are stored on a secure server

hosted by Cre8ion. Electronic attachments are saved to our student database (Class) by Infospeed) which is stored on their secure servers.

- In writing: Before obtaining your consent to share your personal data, we will always tell you why we need to do this. Where possible, we will always try to obtain your consent in writing. This may be on a form where you show your consent by ticking a box and signing a declaration. We may sometimes ask you to write a letter of authorisation – a document that shows you have given permission for us to share your personal data for a specific reason (such as sending your certificate of achievement directly to an agent).
- Verbally: Where we are unable to obtain written consent, we may do this verbally. In cases like this, we will make a record that such consent has been obtained to demonstrate that you have given authorisation for us to share your personal data and for what reason.

#### 5. How is the data used?

We use your personal data to process your application to study with us and to issue your offer letter. We collect other information about you, such as medical information and emergency contact details to see if we need to make any special arrangements for you. The information you provide will only be shared within WE Bridge Academy if we feel there is a legitimate reason to do so. For example: we may pass your phone number to our Academic team if they need to carry out a telephone interview with you as part of the course you are applying for and for attendance purposes.

We have a duty of care to ensure any medical conditions you declare are communicated to the relevant people. For example, if you declare a medical condition and are applying for homestay accommodation, we may need to make the homestay provider aware to ensure your safety. There may be occasions that we will need to inform Academy staff and teachers of your medical condition to make them aware. Whenever there is a genuine need to share your personal information, we will always seek your permission first and inform you of how this information is being shared.

If you suffer from a serious medical condition, it is very important that you tell us. We will seek your permission to inform the relevant team of this condition so we can help you should the need arise.

We inform you about the ways we use your personal data at the application stage. This is detailed on our paper application form and a page on the website for online applications. There may be occasions which arise during your studies where we need to share your personal data for other reasons, which include, but are not limited to:

- Sharing information about your course, attendance and progress to your agent/representative, sponsor, parent, or person responsible for paying your course fees
- Sharing personal data for Academic purposes including student reports, grades, transcripts, and references. For example, helping you secure an offer letter for university

#### 6. How is the data stored?

Your personal data is stored electronically and in files, which are stored under lock and key. We store your data in the following ways:

- When you apply to study with us, we create a student file to store digital copies of your application form, copy of your passport, supporting documentation (such as proof of education) and your visa(s)
- Your personal data including your name, date of birth, sex, nationality, address, contact phone numbers, email address and age are entered into our student database, which is hosted in the Cloud by Infospeed.
- If we store information about you in Office products (such as Word and Excel), they will be protected with a secure password
- Information you supply to us will be retained for audit/legal purposes for up to 5 years
- Academic information stored about you will be held as detailed above
- In cloud-based applications (such as Dropbox), with secure and monitored access

#### 7. How, and after what retention period, do you delete the data?

- For applicants that apply to study with us but do not enrol: Your offer letter will contain a 'latest start date' to allow time for you to start your course should you be unable to start on the specified day. In line with GDPR, and to comply with our internal policies, if you fail to enrol/register/start your course at WE Bridge Academy, we will securely destroy all data we hold about you, both in paper and electronic form and your offer will no longer be valid. This procedure, known as GDPR Erase, will be carried out within 14 days following the latest start date. Should you wish to reapply for the same, or

any other course, we will require a new application to be submitted along with the relevant supporting documentation.

- For applicants that enrol: We will retain records for those that enrol and complete their studies with us for 5 years from the start date of the course for audit and inspection purposes.

8. How and why is the data used?

Data is used to process and enrol students onto our courses, manage student courses and maintain accurate records.

9. Will this data be shared?

Data is shared internally whilst a student studies at the Academy, but only where there is a legitimate reason to do so (e.g., the Academic team may need to access the student database to print a certificate, or the Finance team may require access to check course fees)

10. Do you currently have processor agreements in place?

Students are always informed when their data will be shared. They are advised and have the option to agree to this at the application stage. When applying with/through an agent, they are made aware that the information we may share with the agent will see certain personal details about the student (such as their passport number in an offer letter).

Students have the option to request that information is not shared with their agent. There are no specific processor agreements in place.

11. Does the data include criminal or special category data?

We ask if people applying to work at the Academy have any criminal convictions. We also carry out DBS checks for all new employees. Any such information is securely stored under lock and key.

12. How often is the data processed?

Data is processed daily with the use of in-house systems we use.

13. How many individuals are affected by this processing?

If the Academy were to be at maximum capacity, 120 live students and 30 members of staff. However, applications are processed daily and not all students enrol.

14. Describe how and when you will seek others' views or state why it's not appropriate to do so

We have strict internal procedures to ensure data is only accessed and shared where there is legitimate course to carry out our roles. Where information is shared that may be privileged, its only shared with the appropriate persons (e.g., Safeguarding).

15. Who else must you involve within the organisation?

Admin, Academic and Housing departments all have access to the student data we hold as it is necessary to carry out their roles. Teachers do not have access to the student database.

16. Do you ask your third-party processors to assist you?

No

17. Will you consult a privacy expert?

N/A

18. What have you identified as your lawful basis for processing?

We only request information required to successfully process an offer letter and enrol students onto our courses. We always obtain consent before we process personal data, through consent tick boxes, in writing and verbally.

19. Does the processing achieve its original purpose and why?

We request the minimal amount of data required to complete step 18 above. Without the information we request, we would be unable to lawfully accept and enrol students for study.

20. Is there a way to achieve this purpose without processing data?

As above.

21. How do you ensure data is kept up to date and to a minimum?

Our intelligent online application form populates questions based on the users' responses (e.g., we will not ask for homestay data if they're not applying for homestay accommodation).

22. What information will you provide to individuals to inform them of the processing?

Information and consent forms are clearly visible during the application process and at any point where we may need more information or make a request to share certain details.

23. How will you help support their privacy rights?

- Information is regularly communicated to all staff about any changes to GDPR and how it may affect us
- Annual training and refreshers
- English is not the first language to our students. We explain any points clearly at induction to make sure our policies are clear
- Information is communicated in 'plain English' on our website

24. Do you make international data transfers? If so, what safety measures do you have in place?

Data (e.g., a student's offer letter) may be emailed outside of the UK when a student provides their personal email address. All our email accounts use secure passwords and two factor authentication.