



# Data Protection, Use of Information and Student Confidentiality

## Aims

The aims of this policy are to ensure:

- legal compliance
- good internal practice
- the protection of staff, students and providers
- all staff, clients and providers are assured that such a policy exists

## Principles

In accordance with The Data Protection Act, Bloomsbury International complies with the following principles that personal information about staff, clients and providers is:

- obtained and used fairly and lawfully
- used for limited, specific and relevant purposes
- used in a way that is adequate, relevant and not excessive
- accurate and up to date
- kept for no longer than necessary
- handled according to people's data protection rights
- stored safely and securely
- not transferred outside the UK without adequate protection

This policy must be observed by all Bloomsbury International staff and contractors.

This policy applies to all data and information held by Bloomsbury International, relating to identifiable individuals – including staff, clients and providers. Such information includes, but is not limited to:

- Personal details: name, date of birth, nationality, employment history
- Contact details: address, telephone numbers, email
- Booking details: confirmation /denial of booking, course dates, course times, level, progress, attendance, financial information
- Personal issues: relating to health and welfare

## Responsibilities

### *Overall responsibilities:*

Application of this policy is the responsibility of all individuals at Bloomsbury International. Overall implementation, monitoring and maintenance is the responsibility of the Heads of Departments and Managing Director.

### *Individual responsibility:*

All individuals, including staff, clients and providers are responsible for: providing correct personal information

- checking personal information in relation to their employment (staff) or enrolment (clients) are accurate and up to date
- notifying Bloomsbury International of any changes to information they have provided (contact details, for example)

## **Code of Practice**

### Disclosure

1. Bloomsbury International staff will not disclose identifiable information about any individual, directly or indirectly, to any third party (including but not limited to family, colleagues, friends or other students) who is not a member of Bloomsbury International or relevant provider, without the individual's specific written or verbal consent to the disclosure of such information.
2. Bloomsbury International recognises that information may need to be shared between Bloomsbury International staff members. Shared information must be relevant to its purpose, factual, subject to a 'need-to-know' basis, and exchanged in an appropriate environment or via appropriate medium.
3. Bloomsbury International recognises that information may need to be shared between Bloomsbury International and their service providers. In such cases, only the information necessary for the provider to fulfil the agreed service is to be shared.
4. Bloomsbury International utilises statistical recording of service use to enable the monitoring of demand and to identify any practical or policy issues related to the provision of services. Bloomsbury International ensures that all statistical records given to third parties are produced in an anonymous form, so that individuals cannot be identified.

### *Exceptional cases and extenuating circumstances*

In accordance with the Data Protection Act, personal information may be disclosed to law enforcement agencies without the consent of the individual concerned. Bloomsbury International will comply with such a request if it is legitimate.

However, the Managing Director will ensure the request is legitimate, seeking assistance from the company's legal advisers where necessary.

### *Emergency Contacts*

All staff and students provide the name and address of their Emergency Contact upon arrival at Bloomsbury International.

The Welfare Officer(s) (re students) or Heads of Department(s)/Managing Director (re staff) may decide that information may be disclosed the Emergency Contact without specific consent if, in their judgment, there is a risk of physical danger or other serious harm to the individual or to others.

Circumstances in which the Emergency Contact may be contacted include, but is not limited to:

- three consecutive days of absence (where attempts at direct contact with the individual has not been successful)
- serious issues pertaining to welfare, safeguarding, being asked to leave the course or other emergency

### *Third parties acting on behalf of clients:*

Bloomsbury International may discuss the progress of the booking stages (enquiry to confirmation) with verified third parties (including agents / family) acting on behalf of a student.

In the event that a third party provides information to Bloomsbury International on behalf of an individual, independent verification should also be sought.

*Exceptional cases - Under 18s.*

See safeguarding policy for 16 and 17 year olds

#### Secure Storage

It is the responsibility of all Bloomsbury International staff to ensure that all personal information is stored in lockable storage units when not in use. Only authorised staff have access to the keys of the lockable storage units.

Papers containing confidential information are shredded when no longer required.

Bloomsbury International staff are issued with an individual secure printing code, to prevent print outs containing confidential information being misplaced.

Personal data should never be transferred outside of the European Economic Area, with the exception of Visa Letters – which are sent securely via a courier with a tracking service.

Financial records will be kept for 7 years in accordance with the HMRC for tax purposes.

It is the responsibility of Bloomsbury International staff to ensure that all computer records are held securely and appropriately protected.

Bloomsbury International staff, with permitted access to electronically stored information, are issued with a personal account and password. Computers should be locked when left unattended.

#### Notification of data held

All staff and clients have the right to know the following:

- what personal information Bloomsbury International holds about you, the purpose for which it is used and how to gain access to it
- how it is kept up to date;
- what Bloomsbury International is doing to comply with its obligations under the 1998 Act.

For this information:

- clients should contact the Senior Registrar.
- staff should contact their Heads of Departments or the Managing Director.