



Privacy Notice (How we use accommodation provider information)

At ELC Bristol Ltd we take data protection and the privacy rights of our accommodation providers extremely seriously and we comply with the GDPR. This policy sets out the basis on which any accommodation provider information will be collected, stored and shared by ELC Bristol Ltd.

ELC Bristol Ltd acts as a data controller for accommodation provider information. This means that we as an organisation determine the purposes for which and the manner in which any personal data are, or are to be processed.

The categories of accommodation provider information that we collect, hold and share include:

- Personal information (such as name, date of birth, email addresses, phone numbers, address and passport information)
- Characteristics (such as language, nationality, occupation, interest, details of children or partners)
- Relevant medical information
- Bank information

Why we collect and use this information

We use the accommodation provider information:

- to place students with the best possible accommodation that matches their needs and preferences
- to adhere to safeguarding policies and procedures
- to provide appropriate pastoral care

The lawful basis on which we use this information

Under Article 6 of the GDPR we collect and use student data as per lawful base:

(f) Legitimate interests: the processing is necessary for our legitimate interests.

Collecting accommodation provider information

Whilst the majority of accommodation provider information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required

to provide certain accommodation provider information to us or if you have a choice in this.

Storing accommodation provider data

We hold accommodation provider data for as long as we have an active working relationship with them. This data is stored on an encrypted database and in electronic folders on our network servers that only necessary and approved members of the school staff have access to. When the school no longer works with the accommodation provider, this data is deleted after two years. Any data that is stored on paper is kept within a locked cupboard in a secure office, and is securely shredded when the data is no longer needed. Recording accommodation provider data on paper is discouraged and it is never stored for longer than necessary.

Who we share student information with

We routinely share student information with:

- Students who will be placed with the accommodation provider.
- Educational Tour Organisers and Educational Consultants who work with ELC Bristol Ltd to recruit students for the school.
- Inspectorate bodies including The British Council, ISI (Independent Schools Inspectorate).
- Professional bodies of which ELC Bristol Ltd is a member. These include English UK, IALC, Quality English and TEN (The English Network).
- UK Visas and Immigration upon request.
- Westgate IT (ELC Bristol's IT support partner).
- Our student database creator and manager, Red Pesto.
- Taxi/meet and greet companies who provide student airport transfer services.

ELC Bristol Ltd never shares accommodation provider information for marketing purposes with third party marketing companies under any circumstances.

Why we share student information

We do not share information about our accommodation providers with anyone without consent unless the law and our policies allow us to do so.

We are required to share accommodation provider information for routine inspections by organisations such as The British Council or UK Visas and Immigration as referenced in the list above (Who we share student information with). We are also required to share accommodation provider information for safeguarding purposes when necessary, for example if there is a welfare issue that would require the police to be involved. We also share accommodation provider information with the

Educational Tour Organisers or Educational Consultants who may have sent us the student information originally in order to book accommodation for the student as part of their course with ELC Bristol Ltd.

We share accommodation provider information with professional organisations such as English UK to develop best practice within our industry.

We share accommodation provider information directly with students of the school who will be placed with the accommodation provider during their course at ELC Bristol Ltd.

ELC Bristol Ltd is marketed through our website and through a brochure which is produced in house by the school. The brochure is available on our website for public access and download. This brochure is also shared with Educational Tour Organisers and Educational Consultants who work with ELC Bristol Ltd to recruit students for the school, as well as members of the general public who request a copy either in person (by coming into the school building to make an enquiry) or via email or telephone enquiry. This brochure includes some photos of the homes of accommodation providers and its occupants. Accommodation provider photos are only used in this way after we have obtained direct consent and made a private agreement with the accommodation provider before taking the photos, and as per data compliance laws, should the accommodation provider request that we no longer use this photo all reasonable steps will be taken to adhere to this request.

Requesting access to your personal data

Under data protection legislation, accommodation providers have the right to request access to information about them that we hold. To make a request for your personal information contact info@elcbristol.co.uk or the school office via telephone on 0117 9707050.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance and we will take all reasonable steps to assist you. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact:

Clare Hutton, Registrar at ELC Bristol Ltd clare.hutton@elcbristol.co.uk