

DATA PROTECTION POLICY

Sep 2023

Glamour Edu Ltd

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Glamour Edu Ltd Data Protection Policy

An electronic copy of the policy will be given to all students, parents / agents, members of staff, homestays and partner schools through email. Hard Copy can be provided when required. This policy will be reviewed annually and then updated as necessary. Any changes will be notified immediately to all students, parents / agents, members of staff, homestays and partner schools.

This Data protection Policy should be read in conjunction with the following policies: Safeguarding & Child Protection Policy, Safer Recruitment Policy, Staff Code and Conduct.

Policy Owner: Glamour Edu Ltd Director

Date updated: Sep 2023

Next review date: Sep 2024

1. Policy

Glamour Edu Ltd stores personal information on staff, students, clients and other individuals (complainants, enquirers, suppliers and advisers) in order to provide education and guardianship. This includes personal information to enable us to provide consultancy and advisory services, to promote our services, to maintain our own accounts and records and to support and manage our employees. Glamour Edu Ltd therefore must comply with the Data Protection Act 2018 and The General Data Protection Regulation (GDPR)2018. This document outlines the policy and procedure for associated with holding personal data and how this is protected.

Glamour Edu Ltd processes and stores personal information and data including:

- personal details
- family, lifestyle and social circumstances
- business activities of the person whose personal information we are processing
- goods and services provided
- financial details
- education details
- employment details

Glamour Edu Ltd also processes sensitive classes of information and data that may include:

- dietary, medical, physical or mental health details
- offences and alleged offences
- racial or ethnic origin
- religious or other beliefs of a similar nature

Glamour Edu Ltd registered with the Information Commissioner's Office (ICO). The Data Protection Act 2018 requires every data controller (i.e. the organisation) who is processing personal information to register with the ICO. The registration number for Glamour Edu Ltd is ZA369201 and is registered under the organization name: Glamour Edu Ltd.

Glamour Edu Ltd sometimes need to share the personal information we process with the individual and also with other organisations. Where this is necessary, we are required to comply with all aspects of the Data Protection Act (DPA)2018 and The General Data Protection Regulation (GDPR)2018. The types of organisations we may need to share some of the personal information we process with for one or more reasons include business associates and other professional advisers; family, associates and representatives of the person whose personal data we are processing; financial organisations; current, past or prospective employers; educators and examining bodies; suppliers and services providers; traders in personal data.

Glamour Edu Ltd may need to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the data protection act.

2. Data protection principles

The GDPR 2018 sets out seven key principles which lie at the heart of the general data protection regime. It requires that personal data shall be:

- 1, Processed lawfully, fairly and in a transparent manner in relation to individuals
- 2, Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes.
- 3, Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- 4, Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- 5, Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individual
- 6, Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
- 7, The controller shall be responsible for, and be able to demonstrate compliance with accountability.

3. General Statement

Glamour Edu Ltd is committed to maintaining the above principles. Therefore, we 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

4. Photographing and recording children during events and activities

It's important that children and young people feel happy with their achievements and have photographs and films of their special moments. Family and friends also want to be able to share the successes of their children when they have been part of a special event or activity.

However, it's also important to be aware of child protection and safeguarding issues when people are taking photos or filming at events. The potential for misuse of images can be reduced if organisations are aware of the potential risks and dangers and put appropriate measures in place.

The policy of photographing and recording Children during events and activities should include the following:

- do not use children's names in photograph captions. If a child is named, avoid using the photograph.
- use a parental permission form to obtain consent for a child to be photographed and videoed.
- obtain the child's permission to use their image.
- only use images of children in suitable clothing to reduce the risk of inappropriate use. Some activities, for example swimming and drama, present a much greater risk of potential misuse.
- address how images of children on an organisation's website can be misused. Images accompanied by personal information, such as the name of a child and their hobby, could be used to learn more about a child prior to grooming them for abuse.
- state written expectations of professional photographers or the press who are invited to an event. These should make clear the organisation's expectations of them in relation to child protection.
- do not allow photographers unsupervised access to children.
- do not approve photography sessions outside the event or at a child's home.

Seeking consent for children and young people: Glamour Edu Ltd students will be consulted about the use of their photograph. This ensures they're aware that the image is being taken and understand what the picture is going to be used for. This could be recorded on a child's permission form. For young people under 18 get parental consent to use an image. Glamour Edu Ltd will make sure parents and staff are aware of the school or organisation's photography policy. Glamour Edu Ltd will ask parents to sign a consent form for use of their child's images and keep a record.

Storing images securely: Images or video recordings of children must be kept securely. Hard copies of images should be kept in a locked drawer and electronic images should be in a protected folder with restricted access.

Images should not be stored on unencrypted portable equipment such as laptops, memory sticks and mobile phones.

Avoid using any personal equipment to take photos and recordings of children and use only cameras or devices belonging to the school or organisation.

Glamour Edu Ltd will ensure we are complying with the legal requirements for handling personal information when we store and using photographs to identify children and adults for official purposes, such as identity cards.

5. Complaints

Complaints will be dealt with in accordance with Glamour Edu Ltd.'s complaints policy. If you think your data has been misused or that the organisation holding it has not kept it secure, you should contact Glamour Edu Ltd ICO officer: Vicky Xiaoyan Zhang. **Glamour Edu Ltd ICO Reference number:** ZA369201

If you're unhappy with our response or if you need any advice you should contact the Information Commissioner's Office (ICO).

ICO

casework@ico.org.uk

Telephone: 0303 123 1113

Textphone: 01625 545860

Monday to Friday, 9am to 4:30pm

6. Awareness Training for Staff and Host Families

The following sites provide support information for staff and host families who can regularly self-brief on Information Sharing and data protection. Staff and host families are expected to use these tools annually to complement the safeguarding training provided by Glamour Edu Ltd.

Government Website for Data Protection Regulation:

<https://www.gov.uk/government/publications/guide-to-the-general-data-protection-regulation>

Government Website for Data Protection Act: <https://www.gov.uk/data-protection>

Information Commissioner's Office (ICO) Website:<https://ico.org.uk/>

NSPCC How to deal with Children image sharing website:

<https://learning.nspcc.org.uk/research-resources/briefings/photography-sharing-images-guidance/>