

J&D UK LTD

Data Protection and Information Sharing Policy

Effective December 2020

This policy outlines J&D UK LTD's (Trading as JD Consultancy) commitment to the protection and integrity of data held on individuals (staff, students, clients and other individuals) in compliance with the GDPR Act 2018. The Act defines UK law on the processing of data on living, identifiable people and is the main piece of legislation that governs the protection of personal data in the UK.

1. Data Protection:

J&D UK LTD maintains personal information on staff, students, clients and other individuals in order to provide its guardianship and school placement services and therefore must comply with the GDPR 2018.

The Information Commissioner's Office (ICO) enforces the GDPR and also oversees the Freedom of Information Act and the regulation of interception of communications under the Regulation of Investigatory Powers Act 2000.

J&D UK LTD is registered with the 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 J&D UK LTD is ZA520844 and is registered under the name Christine Sun.

J&D UK LTD needs sometimes to share the personal information it processes with individuals and also with other organisations. Where this is necessary it is required to comply with all aspects of the Data Protection Act (GDPR). The types of organisations with which it may need to share some of the personal information it processes for one or more reasons includes 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.

2. How J&D UK LTD acquires data

Information is given to us by parents/guardians, educational agencies, contractors, suppliers, tutors, employees and other individuals connected with our ongoing business.

Through the course of the J&D UK LTD school placement / tuition process personal

data is recorded to enable the Company to care for the pupil and to fulfil its contractual obligations in the delivery of services. It may also be collected to fulfil legal obligations and/or the regulatory duties that it owes to its regulators and to other third parties.

The primary method the Company uses to collect personal data throughout this time will be from the information contained on the registration form and associated documents completed when applying to schools along with: information obtained from schools, home stay families, Home Office, assessments, scholarships, medical information, etc.

3. The Personal Data includes:

Personal data is any paper-based or electronically stored information about an individual from which that person can be identified.

The types of personal and sensitive personal data the school or college may process include:

Name and contact information such as address, email and telephone number of the pupil, parent, guardian and fee payer

Pupil date and country of birth, ethnicity and country of domicile, passport number or national identity card details and visa status

Information relating to pupil education history such as previous schools and education institutions, courses completed, dates of study, attendance records and examination results

Information relating to fees such as banking details, scholarships and bursaries

Information which may assist with provision for the appropriate medical and pastoral care of the pupil such as any disability, medical, or dietary issues - this may also include information about family or personal circumstances where this is relevant to the assessment of suitability to receive a bursary

A photograph of the pupil will be kept for identification purposes only and we will seek consent for any other usage

J&D UK LTD is committed to protecting the rights and freedoms of all user groups in accordance with the provisions of the EU General Data Protection Regulation (GDPR).

GDPR includes rules on giving privacy information to those whose data is held by an organisation. These rules place an emphasis on making privacy notices understandable and accessible, and Data Controllers are expected to take 'appropriate measures' to ensure that this is the case.

Processing includes obtaining, recording, retaining, storing, disclosing, destroying or otherwise using data. Fair processing means being clear and transparent about how personal information will be used.

4. Sharing data

J&D UK LTD treat all data we hold as confidential and treated with discretion at all times.

Students and host family data is shared with parents, schools and potential host families only.

5. Secure

Wherever possible, information is shared in an appropriate, secure way. J&D UK LTD always follows its organisation's policy on security for handling personal information.

6. Recording Shared Information

Information sharing decisions are recorded, whether or not the decision is taken to share. If the decision is to share, reasons are cited including what information has been shared and with whom, in line with organisational procedures. If the decision is not to share, good practice is to record the reasons for this decision and discuss them with the requester. In line with J&D UK LTD's own retention policy, the information is not kept any longer than is necessary. In some rare circumstances, this may be indefinitely, but if this is the case, there is a review process scheduled at regular intervals to ensure data is not retained where it is unnecessary to do so.

The GDPR and Data Protection Act 2018 place greater significance on organisations being transparent and accountable in relation to their use of data.

All organisations handling personal data need to have comprehensive and proportionate arrangements for collecting, storing, and sharing information.

The GDPR and Data Protection Act 2018 do not prevent, or limit, the sharing of information for the purposes of keeping children and young people safe.

7. To effectively share information:

- all practitioners should be confident of the processing conditions, which allow them to store, and share, the information that they need to carry out their safeguarding role. Information which is relevant to safeguarding will often be data which is considered 'special category personal data' meaning it is

sensitive and personal.

- where practitioners need to share special category personal data, they should be aware that the Data Protection Act 2018 includes ‘safeguarding of children and individuals at risk’ as a condition that allows practitioners to share information without consent.
- information can be shared legally without consent, if a practitioner is unable to, cannot be reasonably expected to gain consent from the individual, or if to gain consent could place a child at risk.
- relevant personal information can be shared lawfully if it is to keep a child or individual at risk safe from neglect or physical, emotional or mental harm, or if it is protecting their physical, mental, or emotional well-being.

8. Records Retention Rationale

(How and why J&D UK LTD keep records and for how long)

Records retention at J&D UK LTD is an essential component of an efficient and effective records management system. It provides J&D UK LTD with a basis for consistent action on records and eliminates the need for individuals to make all decisions about how long to keep the records they use.

Consistently applied, the Schedule will help protect J&D UK LTD’s interests by ensuring its records are retained for as long as they are needed, to meet operational needs and legal obligations - particularly under the Freedom of Information and Data Protection Acts - and demonstrate accountability to students, parents, guardianship families, schools and other stakeholders.

9. The main types of records that J&D UK LTD creates, receives or maintains as part of its activities are listed below.

1. Teaching/Tutoring
2. Research
3. Student Files
4. Estate management
5. Finance
6. Human resources/Training
7. IT
8. Information management and compliance
9. Public relations
10. Marketing

10. Tracking & Cookies Data

J&D UK LTD may use cookies and similar tracking technologies to track the activity on our Service and hold certain information.

Cookies are files with small amount of data which may include an anonymous unique identifier. Cookies are sent to your browser from a website and stored on your device. Tracking technologies which may also be used are beacons, tags, and scripts to collect and track information and to improve and analyze our Service.

You also have the right to complain to the Information Commissioner (<https://ico.org.uk/concerns>) if you have any concerns in respect of the handling of your personal data by the Company.

J&D UK LTD reserve the right to change this Privacy Policy as we may deem necessary from time to time or as may be required by law. Any changes will be immediately posted on the Site and you are deemed to have accepted the terms of any such amended Privacy Policy on your first use of the Site following such alterations.

11. Rights of Access

You have a number of rights in relation to your data under the GDPR.

These are:

The Right of Access: you may request a copy of the personal data that J&D UK LTD holds on you

The Right to Rectification: you may ask us to correct any information we have about you that you believe is incorrect

The Right to Erasure: you may ask J&D UK LTD to delete information that we hold on you. Please note that we cannot delete data required to be kept for our legislative and regulatory compliance

The Right to Restrict Processing: you may ask us to not process or limit the use of your data in some instances. Please note that we may not be able to comply with requests that contravene our legal and regulatory obligations

The Right to Data Portability: you may ask us to transfer the data to another organisation in a format that makes it easy for them to use

If at any point you believe the Data we hold is incorrect you may request to see your Data to have it corrected or deleted. If you wish to make a complaint, you can do so by contacting the Information Commissioner's Office. If you have any questions or if you do not want us to retain or use your personal information, you may withdraw your consent (i.e. "opt out"), by contacting info@jdconsultant.co.uk.

J&D UK LTD (the Company) is registered in England and Wales under the Companies Act (Company No.6652816).

The Company operates from offices in the UK, and its Data Protection Officer can be contacted at this address, by telephoning 0208 895 8455 or by emailing info@jdconsultant.co.uk

Should you have any queries regarding Data Protection, please contact Christine on 0208 895 8455 or christine@jdconsultant.co.uk

Useful information, websites and supporting reference documents:

A copy of the Data Protection Act is available on:

http://www.legislation.gov.uk/ukpga/1998/29/pdfs/ukpga_19980029_en.pdf

Policy Date: Dec 2020

Review: November 2021

Dr Peter McG