

Privacy Notice

How we use student (and some parent/guardian) information received and processed during Summer at Hurst College.

This is separate to our ‘Understanding our Privacy and Cookies Policy’

Manor Courses, the company, the Data Controller

Company name = Manor Courses Limited (Ltd), called MC in the below.

Contact = 67 Warren Way, Brighton, BN2 6PH, UK ;

Email = info@manorcourses.co.uk ;

ICO Registration = No. A8120712

Data Protection Officer (DPO) = Jon Barnard (Course Director)

jon@manorcourses.co.uk

The categories of student information that we process include:

- personal identifiers and contacts (such as name, contact details and address)
- parent/guardians’ contact details
- characteristics (such as language, age)
- safeguarding information (welfare reports if any, disclosure or allegations made by or against, *if any*)
- special educational needs (*if any*)
- medical (allergies, medication, dietary requirements, *if any*)
- attendance (excursions, accommodation, sessions attended, absence frequency and reasons)
- assessment and achievement (English class, level placement test results, awards for activities)
- behavioural information (opinions, social-media profiles (including interests), discipline reports, *if any*)
- transport arrangements (to/from airports, or other leisure facilities, *if any*)
- images (photo, video, appearance, behaviour)

This list is not exhaustive, but it is the routine collection of data every summer (and pre-summer) period. Other information may be collected by teachers in classes.

Why we collect and use student (and some parent/guardian) (data subject) information

We process personal information to enable our legitimate interest as Data Controller, to:

- *provide Residential English Language Courses (education programmes conducted outside the UK State system), in addition to leisure, welfare and support services at our Summer School at Hurst College; maintain our own accounts and records, for administration in connection with boarding and the organisation of our Courses; and to support and manage our staff and students.*

We collect and use student information, for various purposes. Under the General Data Protection Regulation (GDPR), there are various lawful bases we rely on for processing student information.

<i>for the purposes of....</i>	<i>in accordance with the legal basis of.....</i>
<ul style="list-style-type: none"> • support student learning, provide education • monitor and report on attendance/achievement/assessment 	Performance of Contract
<ul style="list-style-type: none"> • social media communication with current audience to: <ul style="list-style-type: none"> ◦ celebrate the achievements of students ◦ promote to potential parents/agents ◦ engage with student and parent/agent community ◦ share resources/advice 	Consent (or parent and/or child)
<ul style="list-style-type: none"> • provide appropriate medical and pastoral care and welfare support • behavioural information 	Performance of Contract, Protection of Vital Interests
<ul style="list-style-type: none"> • keep children safe, child protection policy • health and safety of all school participants 	Protection of Vital Interests
<ul style="list-style-type: none"> • assess the quality of our services , customer satisfaction • offer correct service 	Consent (of child), Legitimate Interest of MC
<ul style="list-style-type: none"> • select, delegate and support staff • maintain accounts and records 	Compliance with Legal Obligation

In addition, concerning any sensitive (special category, high risk) data regarding: *welfare and mental health, medical information and physical health, dietary requirements, discipline records, information relating to criminal offences or alleged offences*, we might also share this information for the purposes and legal bases below.

<ul style="list-style-type: none"> • keep children safe, child protection policy • provide appropriate pastoral care and welfare support services 	Compliance with Legal Obligation
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How we collect student information

We collect student information via:

- Student enrolment forms – by email, post, online – from parents/guardian
- Agent group registers – by email - from agents/group leaders
- Generated at Hurst College - by students or staff – through questionnaires, participation registers
- External sources – according to incidences – from eg. NHS,

airport/visa security, police Student data is essential for the MC's

operational use. Whilst the majority of student information you

(parents/guardians, or agents/group leaders) provide to us is mandatory, some of it

requested on a voluntary basis. In order to comply with the data protection

legislation, we will inform you at the point of collection, whether you are required to

provide certain student information to us or if you have a choice in this (please

consult our Consent Form for the latter). You have the right to withdraw any Consent

you have given us.

If you do not supply any information we request, we may not be able to offer our full services.

How we store student data

We hold student data securely for the set amount of time shown in our data retention

schedule (part of our Audit of Regular Processing, and outlined in our Data

Protection Policy). For more information on our data retention schedule and how we

keep your data safe, please email the Course Director (also the Data Protection

Officer) jon@manorcourses.co.uk or see our Data Protection Policy on

www.manorcourses.co.uk/welfare

We outline where data is held, the security arrangements, and policies about safe

use of data by staff. Between MC staff and the Data Controller (MC Directors),

information is shared electronically. Information generated at Hurst College during

summer is shared on paper and electronically.

There is no automated decision making.

Who (recipients) we share student information with

Outside of MC Staff at Hurst College, we do not routinely share student

information with anyone. However, in certain circumstance MC may be obliged

to share it with:

- Catering and health and safety staff at Hurst College
- External third parties might include our accountants, insurers, industry bodies (eg. British Council)
- Transport companies
- Legal organisations such as HNS (for health), police, or child protection agencies

Why we regularly share student information

We do not regularly share information about our students with anyone without

consent unless the law and our policies allow us to do so.

It might be shared for the purposes of: *maintain accounts and records, keep children safe, provide appropriate pastoral care, supply welfare support services.*

Such information is shared on paper and electronically by email with any of the above.

Your rights, requesting access to your personal data

Under data protection legislation, parents/guardians and students have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational and/or welfare record, contact the course Director (also the Data Protection Officer)

jon@manorcourses.co.uk . You have the right to withdraw any Consent you have given us.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, or lodge a complaint, either through the ICO, or through the courts

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with us in the first instance, or if in UK our outside EU, directly to the Information Commissioner's Office at

<https://ico.org.uk/concerns/>

Enquiries from EU citizens/companies about MC's data should contact our EU-GDPR representative:

- Rickert Rechtsanwaltsgesellschaft mbH, Manor Courses Ltd,
Colmantstraße 15, 53115 Bonn, Germany
art-27-rep-manorcourses@rickert.law

Contact

If you would like to discuss anything in this privacy notice, please contact Jon Barnard, the Course Director (also the Data Protection Officer)

jon@manorcourses.co.uk .

If children or parents wish to withdraw any Consent you have given us, email Su Barnard (Director) su@manorcourses.co.uk .

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