

Data Protection Policy

Policy Statement

IQ Consultancy LTD will comply with all statutory requirements of The Data Protection Act 1998 (“the Act”) by taking all reasonable steps to ensure the accuracy and confidentiality of such information. **IQ Consultancy LTD** needs to gather and use certain information about individuals. These can be parents, students, agents, homestays, suppliers, business contacts, employees and other people the guardianship organisation has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet **IQ Consultancy LTD** data protection standards, and to comply with the legislation.

Policy

Why this policy exists:

This data protection policy ensures **IQ Consultancy LTD**:

- Complies with data protection law and follows good practice;
- Protects the rights of staff, parents, students, homestays and partners;
- Is open about how it stores and processes individual’s data;
- Protects itself from the risk of data breach.

The Information Commissioner’s Office

The Information Commissioner’s Office (ICO) is “the UK’s independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals” (ICO website). It is responsible for administering the provisions of the Data Protection Act 1998; the Freedom of Information Act 2000; and the General Data Protection Regulation 2018.

The Act requires every data controller who is processing personal information to register with the ICO (unless exempt). **IQ Consultancy LTD** is registered with the ICO as a data controller, and this is renewed annually (Registration reference: *add reference here*).

The ICO publishes a Register of data controllers on their website, on which **IQ Consultancy LTD** is listed.

The Data Protection Act 1998

The Act protects individuals’ rights concerning information about them held on computer and in any **IQ Consultancy LTD** personnel files and databases. These rules apply regardless of whether data is stored electronically, on paper or other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

The Freedom of Information Act 2000

The Freedom of Information Act provides public access to information held by public authorities, in two ways:

- public authorities are obliged to publish certain information about their activities; and
- members of the public are entitled to request information from public authorities.

General Data Protection Regulation 2018

The UK GDPR places greater emphasis on the documentation that data controllers must keep to demonstrate their accountability. Compliance requires organisations to review their approach to governance and how they manage data protection as a corporate issue.

IQ Consultancy LTD will handle and protect all information in line with data protection principles set out in the Act. Under the Act, anyone processing data must comply with the eight principles of good practice for data protection, as detailed below:

Data will be:

- Fairly and lawfully processed;
- Processed for limited purposes;
- Adequate, relevant and not excessive in relation to the purpose(s) for which they are processed;
- Accurate and kept up to date;
- Not kept longer than necessary;
- Processed in accordance with the data subject's rights under the Act;
- Secure and protected. Appropriate technical and organisational measures are in place to protect data from unauthorised or unlawful processing and from accidental loss, damage or destruction.
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This **IQ Consultancy LTD** Data Protection policy applies to personal data as defined by the Act – that is, data from which a living individual can be identified, either from data alone, or from that data and other information that is held by the data controller. This includes information held on computer, paper files, photographs etc.

Responsibilities

This policy applies to the main office of **IQ Consultancy LTD**, all staff, volunteers and other people working on behalf of **IQ Consultancy LTD**. The scope of the policy applies to all data held by **IQ Consultancy LTD** relating to identifiable individuals. Everyone who works for **IQ Consultancy LTD** has responsibility for ensuring data is collected, stored and handled appropriately – all must ensure personal data is handled and processed in line with this policy and data protection principles.

The data controller is responsible for:

- Keeping the Director and the owners updated about data protection responsibilities, risks and issues – in the form of an annual report;
- Reviewing all data protection procedures and policies;
- Arranging data protection training if required;
- Handling data protection queries from those working for and with **IQ Consultancy LTD**;

- Dealing with requests from individuals relating to the data **IQ Consultancy LTD** holds about them;
- Assisting with any agreements with third parties that may handle sensitive data;
- Working with IT contractors to ensure that all systems, services and equipment used for storing data meet acceptable security standards, including ensuring regular checks, scans and updates to ensure security hardware and software are functioning properly.

The purpose of the Act is to make sure that personal data is used in a way that is fair to the individual and protects their rights, while enabling organisations to process personal data in pursuit of their legitimate aims.

Staff guidelines

- Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk.
- Employees should keep all data secure, taking sensible precautions and following these guidelines;
- Strong passwords must be used, and never shared;
- Personal data should not be disclosed to unauthorised people, either within **IQ Consultancy LTD** or externally;
- Data should be regularly reviewed and updated if found to be out of date. If no longer required, it should be deleted and/or disposed of;
- When not in use, paper format data or files (for instance, DBS applications) should be kept in a locked drawer or filing cabinet;
- Employees should make sure paper and printouts are not left where unauthorised people could see them, for instance, on a printer;
- Data printouts should be shredded and disposed of securely when no longer required;
- When working with personal data, employees should ensure computer/laptop screens are always locked when left unattended;
- Personal data should never be saved directly to laptops or other mobile devices like smartphones or tablets, unless encrypted.

IQ Consultancy LTD may collect and process the following examples of data:

- Full name (including title, forename(s), family name);
- Job title;
- Contact information (for example, current home/business address, telephone numbers, email addresses, website address);
- Qualifications/experience;
- Date of birth;
- Information relevant to HR (for example: C.V.s, interview notes, referee details, ID);
- Student medical details;
- Copies of students' passport, Visa and BRP;
- DBS reference number;
- School name and personnel;
- School year group;

- Main language for correspondence;
- Level of guardianship service provided;
- Date of last visit for student (at homestay);
- Whether private fostering assessment has been undertaken by the Local Authority;
- Details of venues (name, location, address, contact details);
- Feedback forms;
- Photographs (for example, students, staff, homestays).

IQ Consultancy LTD may use/process this information to:

- Carry out our obligations arising from any contracts/ agreements entered into by you and us;
- Contact parents, students, homestays and schools;
- Undertake administrative functions (for example, HR, contact referees);
- Process DBS applications;
- Compile marketing lists (e.g. for newsletter and conferences);
- Handle complaints;
- Conduct research;
- Share anonymous details with 3rd parties for the purpose of obtaining professional advice;
- Understand people's views and opinions (for example, via feedback forms);
- Send out information that **IQ Consultancy LTD** thinks might be of interest to others;
- Improve our services;
- Comply with legal and regulatory obligations;
- As part of the accreditation process, **IQ Consultancy LTD** is required to send the AEGIS office a copy of the contact details for their partner schools and parents subject to their consent. They will also provide the names of the students. This data is held securely by AEGIS and is destroyed once the inspection process is finished.

Protecting your information

IQ Consultancy LTD has appropriate technical and organisational measures in place to protect your information. Paper files are locked away securely and electronic files are protected by access rights.

Data accuracy

The law requires **IQ Consultancy LTD** to take reasonable steps to ensure data is kept accurate and up to date. It is the responsibility of all employees and people working with **IQ Consultancy LTD**, who work with data, to take reasonable steps to ensure it is kept accurate and as up to date as possible.

- Data should be held in as few places as necessary. Staff should not create any unnecessary additional data sets;
- Staff should take every opportunity to ensure data is updated, for instance, details can be updated when a parent calls;
- Any data inaccuracies should be corrected as soon as discovered (for instance if a member can no longer be reached on their stored telephone number, this should be removed from the database).

Data protection risks

This policy helps to protect **IQ Consultancy LTD** from data security risks including:

- Breaches of confidentiality, for instance: information being given out inappropriately;
- Failing to offer choice, for instance: all individuals should be free to choose how the company uses data relating to them;
- Reputational damage, for instance: the company could suffer if hackers successfully gained access to sensitive data.

Accessing your information

Under the Act, an individual is entitled to ask **IQ Consultancy LTD**:

- For a copy of the personal information held by **IQ Consultancy LTD**;
- For any inaccuracies to be corrected;
- How to gain access to such data;
- How they are meeting their data protection obligations.

Such requests are known as 'subject access requests'. Such requests should be made either via email. Email requests should be addressed to the data controller at k.handcock@iqconsultancy.uk.

There is no administration charge for any subject access request. The data controller will aim to provide the relevant data within 14 working days. The data controller will always verify the identity of anyone making a subject access request before handing over any information.

Sharing your personal information

In certain circumstances, the Data Protection Act allows personal data to be disclosed to law enforcement agencies without the consent of the data subject. Under these circumstances, **IQ Consultancy LTD** will disclose requested data. However, the data controller will ensure the request is legitimate, seeking assistance from the Director, and by taking legal advice where necessary. If on the rare occasion, we need to share data, we will only use data anonymously. If personal information is shared, it will be done so in line with the Act. You are entitled to know why and how we are sharing your personal information and the organisation or individual receiving your personal information will be required to protect your information in line with the Act.

Logging and recording of communications with individuals

IQ Consultancy LTD may log communications with you for the purposes described earlier in this policy.

Links to other websites on the **IQ Consultancy LTD** website.

Our website includes links to other websites (for example: to other organisations dealing with boarding students, government departments and agencies). We are not responsible for the data protection and privacy practices of these organisations, including their website. This Data Protection Policy applies to **IQ Consultancy LTD** only.

Providing information

IQ Consultancy LTD aims to ensure that individuals are aware that their data is being processed and that they understand:

- How the data is being used;
- How to exercise their rights.

To these ends, a copy of this policy which sets out how data relating to individuals is used by **IQ Consultancy LTD** can be available on request. This policy is also available on the **IQ Consultancy LTD** website.

For further information

If you have any questions about this policy, please contact the Data Controller at **IQ Consultancy LTD** via email at k.handcock@iqconsultancy.uk

Review

We are committed to reviewing our policy and good practice annually.

This policy was last reviewed on:(date)

Signed:

by **the Director Kasha Handcock**

Date: