



PRIVACY NOTICE FOR HOST FAMILIES

1. WHAT THIS PRIVACY NOTICE IS FOR

In order to fulfil the contract between you and the school, d'Overbroeck's will collect, use and hold ("process") personal data relating to you as a Host Family. This makes d'Overbroeck's a "data controller" of your personal information under data protection law. This Privacy Notice sets out how and why we use personal information about you, and what your rights are concerning the information we hold.

Your privacy is important to us and we want to keep your personal information safe. The school holds only the personal information we are permitted to hold about you, and uses it only for limited purposes relating to your child's education, health and wellbeing at the school.

2. THE KIND OF INFORMATION WE HOLD ABOUT YOU

The data or type of data we process	The purpose of processing that data	The lawful bases for processing this data
Name, date of birth, gender, marital status, occupation	To administer our relationship with you	Fulfilment of a contract with you
Telephone number, email address, postal address	To administer our relationship with you	Necessary for our legitimate interests (to manage the workforce)
Details of others living in the household (name, date of birth, relationship to main contact, occupation) and details of regular overnight visitors (name, date of birth, relationship to main contact, where person usually resides, eg, university, other permanent home, etc)	As part of our safeguarding obligations towards students	To comply with a legal obligation to keep children safe
Bank account details, National Insurance number, tax status information	To process payments To provide tax and related data to HMRC	Fulfilment of a contract with you Compliance with a legal obligation
References	To facilitate safe recruitment, as part of our safeguarding obligations towards students	Compliance with a legal obligation
Images including CCTV recordings	To fulfil our contractual obligations with you	Compliance with a legal obligation
Criminal record information	To meet our safeguarding obligations	Compliance with a legal obligation
Medical and disability information	To fulfil our contractual obligations with you	Necessary for our legitimate interests (to meet the requirements of accrediting bodies)

Where we have obtained consent to use optional Host Families' data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

3. HOW WE COLLECT YOUR PERSONAL INFORMATION

We generally collect personal information from you directly, using the various forms you complete when the Host Family arrangement is drawn up. We will check regularly to ensure that the data we hold about you is up-to-date. If your personal details change, it is important that you let us know so that the information we hold is accurate.

We may also collect electronic information relating to your presence at virtual Open Days and other online events, including visits to our website. This information is collected through cookies and other IT tracking technologies and includes, but is not limited to, IP address, domain name, browser version and operating system, traffic data, location data, web logs and other communication data resources that are accessed, and the associated telemetry data, eg, how long you spent watching a video.

4. HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

It is important to be aware that, where appropriate, we may also use sensitive personal information about you, such as your medical and health information, ethnicity or religion. This information provides us with the information we require to meet your needs and our students' needs when placing a student in your care, and to fulfil the school's legal and regulatory responsibilities regarding child protection and monitoring.

Particularly strict rules apply when processing medical, pastoral or safeguarding records.

5. SHARING YOUR DATA WITH OTHERS

When it is legally necessary, or allowed under data protection law, we may need to share information about you with the organisations listed in the table below, for the listed reasons.

Organisation name	The reason for sharing
The Local Education Authority	To meet our obligations for sharing data with the government
Government departments	To meet our legal obligations on matters such as tax and social security
Our auditors	For carrying out legal audits of company accounts
Police forces, courts, tribunals	For dealing with legal issues
Security providers	For DBS checking services
Students, parents and agents	To fulfil our contractual obligations with you when making a booking

We may also share your data with other third parties where we are required to do so by law. These might include the Independent School's Inspectorate, the Charity Commission, Ofsted, or other regulators.

6. TRANSFERRING DATA INTERNATIONALLY

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. For example, we may send selected details about you to the family of the student who will be placed with you, and to the agent acting on our behalf in that country.

We will only transfer personal data to a country or territory outside the European Economic Area if the following conditions apply:

- where the transfer is to a place that is regarded by the European Commission as providing adequate protection for your Personal Information; or
- where we have put in place appropriate safeguards to ensure that your Personal Information is protected (for example where both parties involved in the transfer have signed standard data protection clauses adopted by the European Commission); or
- the above does not apply but we are still legally permitted to do so, for example if the transfer is necessary for the establishment, exercise or defence of legal claims.

We have put in place measures to protect the security of your information. If you would like details of these measures please contact us (see section 12).

Third parties will only process your personal information on our instructions and where they have agreed to treat the information confidentially and to keep it secure.

7. HOW WE SECURE YOUR INFORMATION WHEN OTHERS USE IT

All our service providers have to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only allow them to use your personal data for specified purposes and in accordance with our instructions and in accordance with the law.

Arrangements with third party IT processors are always subject to contractual assurances that personal data will be kept securely.

8. DATA SECURITY

We protect the security of your information. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those individuals who have a need to know it. They will only use your personal information on our instructions and they will be required to treat it as confidential.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

If you would like details of these measures please contact us (see section 12).

9. DATA RETENTION

The school will keep your personal information securely and only for as long as it is necessary for a legitimate and lawful reason. We will keep personal information about you while you are an active partner. We create and maintain records for each Host Family. The information contained in these records is kept secure and is only used for purposes directly relevant to your role as a Host Family for d'Overbroeck's. Once your time as a Host Family with us has ended, we will delete the information in accordance with our Data Retention Policy.

In some circumstances we may anonymise your personal information so that it can no longer be linked to you. If we do this, we may use such information without telling you.

10. YOUR RIGHTS IN CONNECTION WITH PERSONAL INFORMATION

You have the following rights in connection with your personal information:

- **Subject Access Request** – you may ask to see a copy of any personal data we hold about you. This information will generally be provided within one month of us confirming your identity and understanding the scope of your request;
- **Rectification** – you may ask for your personal information to be amended or incomplete data completed;
- **Erasure** – you may ask for your personal information to be deleted;
- **Restriction** – you may ask for us to limit the processing of your personal information in some circumstances, for example, whilst we resolve a complaint. Restriction means that although we still store the data, we will not process it (or will not process it for certain purposes) until such time as the restriction may be lifted;
- **Portability** – you may ask for a copy of any personal data you have provided to us to be returned to you, or transmitted to another controller, in a commonly used machine readable format;
- **Objection** – you may object to us processing a specific type of personal information that requires your voluntary consent, unless there are legitimate grounds on which we can rely to process it;
- You may also request further detail about the safeguards we have in place regarding transfers of personal information outside of the EEA and, where applicable, a copy of the standard data protection clauses that we have in place.

If you want to do any of the above, please contact us in writing (see section 15). The school will endeavour to respond to any such requests as quickly as reasonably practicable, and in any event within statutory time-limits, which is one month in the case of requests for access to information.

The school may have compelling reasons to refuse specific requests to amend, delete or stop processing you or your child's personal data, for example, a legal requirement, or where it falls within a legitimate interest in this Privacy Notice.

Your right to withdraw consent

Where you have voluntarily supplied optional personal information, you can withdraw this consent at any time. If you wish to withdraw your consent, please contact us (see section 12).

11. CHANGES TO THIS PRIVACY NOTICE

We may update this notice from time to time and publish a new version on the [Privacy Notices page](#) of our website. We may also notify you in other ways from time to time about the processing of your personal information.

12. CONTACTS AND COMPLAINTS

If you have any questions about this privacy notice or how we handle your personal information, or if you wish to exercise any of your rights under applicable law, please contact the Data Compliance Administrator via tracy.roslyn@doverbroecks.com.

If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to the Information Commissioner's Office (ICO) www.ico.org.uk, the UK supervisory authority for data protection issues. The ICO recommends that you take steps to resolve the matter with the school before involving them.

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