

## **Introduction**

During the course of CLASS' activities CLASS will process Personal Data about consultants, clients, students and suppliers.

This notice is aimed at all consultants whether full time or part time or contracted and whether paid or unpaid (whatever their position, role or responsibilities) and at all clients, students and suppliers. It explains how CLASS uses Personal Data that is covered by the Data Protection Act 1998 (the Act). CLASS may amend this statement at any time.

The purpose of the Act is to safeguard information about individuals. The Act covers issues such as data security, an individual's right to access their Personal Data and use and the disclosure of Personal Data.

CLASS is a 'Data Controller' under the Act. This means that it is responsible for compliance with the Act.

Personal Data is information about identifiable individuals that is held electronically. It also applies to some other records such as certain medical records.

CLASS has appointed Ann Muston as its Data Processor. Any questions you have in relation to this Policy should be sent to Ann Muston ([ann@cambridgeenglishclass.com](mailto:ann@cambridgeenglishclass.com)).

## **What Personal Data CLASS holds and how it is acquired**

Examples of the Personal Data which CLASS holds include:

- Information gathered during the recruitment process of consultants such as information about education and qualifications, professional achievements and suitability for the role;
- Information gathered during negotiations with clients about themselves or the students they represent;
- Information gathered from students before and during the provision of CLASS' services;
- information about work or study performance.
- other information such as financial information, DBS checks, photographs, expressions of opinion or indications as to intentions regarding consultants.

CLASS may process sensitive Personal Data relating to consultants, clients, students or suppliers including:

- Information about consultants' and students' physical or mental health conditions in order to take decisions regarding fitness for work or study;
- information about protected characteristics of consultants in order to monitor compliance with equal opportunities legislation, or of students or clients in order to ensure services provided are suitable for the culture concerned.

CLASS may acquire Personal Data in a number of ways. For example:

- Consultants, clients, students and suppliers may provide CLASS with Personal Data about themselves;
- Personal Data may be created internally by CLASS during the course of work or study;
- Personal Data may be acquired from outside of CLASS such as from other companies, public authorities, public sources and in connection with references.

## ***How CLASS uses Personal Data***

In respect of consultants, clients, students and suppliers, CLASS uses Personal Data for:

- Ensuring that CLASS provides a safe and secure work and study environment and associated services;
- providing employment services (such as references);
- providing training and support;
- protecting and promoting CLASS' interests and objectives;
- personnel, administrative and management purposes and to enable CLASS to meet its legal obligations. For example, to pay consultants and to monitor their performance;
- safeguarding and promoting the welfare of all consultants and students;
- fulfilling our contractual and other legal obligations.

CLASS may use Personal Data for other purposes where the Act allows and where providing an explanation would not be appropriate. For example, this includes sharing Personal Data with the relevant statutory agencies investigating allegations of misconduct or for the prevention and investigation of crime.

24 May 2018