

# UKGuardianship Privacy Notice

UKG takes your privacy extremely seriously; we are committed to protecting and respecting your privacy. This policy explains the what, how, and why of the information we collect from you, including when you visit our website. It also explains the specific ways we use and disclose any information.

## Who are we?

We are company number 06887952 registered in the UK as Academic Powerhouse (UK) Ltd but we usually trade as UKGuardianship (UKG). We are a guardianship organisation and provide additional education services.

The registered office address is Kinetic Business Centre, Theobald Street, Borehamwood, WD6 4PJ.

## How do we collect information from you?

We obtain information about you when you use our website, when you contact us and when you apply to work with us or use our services.

## What type of information is collected from you?

The personal information we collect might include your name, address, contact details, email address, IP address, information regarding which UKG webpages you have accessed and when.

We will collect sensitive details about our employees, homestay, students and parents. This might include proof of ID, dates of birth addresses etc.

## How is your information used by UKG?

UKG may use your information to:

- Carry out our obligations arising from any contracts/ agreements entered into by you and us.
- Help us improve our services and target our audience more effectively.
- Send you details of forthcoming events and training which we feel would be of interest to you.

## Why does UKG collect your information?

- To enable us to undertake our job.
- For safer recruitment purposes.

## Who will your information be shared with?

- UKG will never share your information with any third party, without your prior consent. The exception to this is where there is a safeguarding concern which results in the need to share information with external agencies, the police or the DSL in schools.
- UKG will share information on a 'need to know' basis with their staff, homestays, students, parents/ agents and schools.

- UKG is a member of AEGIS. As part of the accreditation process, UKG is required to send the AEGIS office a copy of the contact details for all their homestays, partner schools and parents. 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.
- Please be aware that as part of the accreditation/ reaccreditation process, AEGIS uses a third-party survey software companies such as Survey Monkey to create and run professional online surveys. Survey Monkey's privacy policy can be found here: <https://www.surveymonkey.com/mp/legal/privacy-policy/> UKG will be required to send homestays, parents, students and schools a link to a questionnaire
- UKG never sells lists or email addresses.

### **How will UKG's privacy information be provided?**

- orally
- in writing
- electronically (<https://ukguardianship.com/uk-guardianship/handbook-and-policies/>)

### **UK General Data Protection Regulations (UK GDPR)**

UK GDPR will replace current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data. We have created this privacy notice, along with information about the increased rights you have in relation to the information we hold on you and the legal basis on which we are using it.

### **How we use your information**

This privacy notice tells you what to expect when UKG collects personal information. It applies to information we collect about:

- visitors to our website;
- complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry;
- people who use our services e.g. who subscribe to our newsletter;
- people who we notify under the Data Protection Act;
- job applicants and our current employees.

### **Visitors to our websites**

When someone visits [www.ukguardianship.com](http://www.ukguardianship.com), we use a third-party website host called SiteGround. This is where the website data is stored and how users' browsers can view the content. This website host will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

### **Use of Cookies by UKG Website**

Similar to other commercial websites, the UKG website uses a technology called "cookies" and web server logs to collect information about how our website is used. A cookie is a very small text

document, which often includes an anonymous unique identifier. When you visit a website, that site asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies. Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and just after our website. Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website and which parts of the website are most popular. This helps us gather feedback so that we can improve our website and better serve our customers. Cookies do not allow us to gather any personal information about you. We use 'session' cookies which enable you to carry information across pages of the website and avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the website is being used and to improve its structure. We also use 'persistent' cookies which remain in the cookies file of your browser for longer and help us to recognise you as a unique visitor to the website, tailoring the content of certain areas of the website to offer you content that match your preferred interests. You can refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the website.

## **Links to other websites**

This Privacy Notice does not cover any links within the UKG website linking to other websites/organisations. We encourage you to read the privacy statements on the other websites you visit.

## **Security and performance**

UKG does not use any third-party service to help maintain the security and performance of our website, only the service that SiteGround offers with regards to hosting – see Email section below. IP addresses of visitors are taken when people are on our website, as mentioned in the Cookies section above.

## **People who email us**

UKG monitors any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law. UKG uses an email server called SiteGround. Transport Layer Security (TLS) is the protocol used by UKG's email system – a type of end-to-end encryption, which provides internet security over a computer network, which aims to privacy and data integrity between two communicating computer applications. UKG uses TLS to encrypt and protect email traffic in transit. Without TLS, emails cannot be accessed by UKG. TLS is handled by the server and the software (for instance, Outlook). Webmail/Gmail\* is the way to access UKG emails outside of Outlook or other email client/software. Only people with access details are permitted to access the UKG webmail system. The webmail is password protected, and this needs to be a specific strength to work.

\*The Google privacy policy can be found here: <https://policies.google.com/privacy?hl=en>

## People who contact us via social media

UKG has accounts on Twitter, Facebook, Instagram, YouTube and Weibo. We also communicate with parents and students via WeChat and Line.

Twitter's privacy notice can be found here: <https://twitter.com/en/privacy>

Facebook's privacy notice can be found here: <https://www.facebook.com/policy.php>

Instagram's privacy notice can be found here: <https://help.instagram.com/155833707900388>

YouTube's privacy notice can be found here: <https://www.youtube.com/static?template=terms>

Weibo's privacy notice can be found here:  
<https://www.weibo.com/ttarticle/p/show?id=2309404188407642369456>

WeChat's privacy notice can be found here: [https://www.wechat.com/en/privacy\\_policy.html](https://www.wechat.com/en/privacy_policy.html)

Line's privacy notice can be found here: [https://terms2.line.me/creators\\_privacy\\_policy](https://terms2.line.me/creators_privacy_policy)

## People who call us

When you call UKG, we collect Calling Line Identification (CLI) information. Our telephone lines are with Kinetic Business Centre their privacy notice can be found at: <http://www.kinetic-centre.co.uk/index.php?privacy-policy>

## People who make a complaint to us

When we receive a complaint from a person, we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint. We will only use the personal information we collect to process the complaint. From time to time, we may compile and publish statistics showing information such as the number of complaints we receive, but not in a form which identifies anyone. We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis. We will keep personal information contained in complaint files for 2 years, from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle. Similarly, where enquiries are submitted to us, we will only use the information supplied to us to deal with the enquiry and any subsequent issues.

## People who use the services of UKG

We never use a third-party to deal with any information requests. All requests are handled in-house. Any provided contact details are only used to provide the requested information, or other closely related purposes. For example, we might use such information about people who requested information about UKG in order to send them information about our services. However, when people receive this information, they have an option to unsubscribe.

## **Job applicants, current and former UKG employees**

UKG is the data controller for the information you provide during the process unless otherwise stated. UKG occasionally uses a third-party Recruitment website to assist in collating applicants, such as Indeed. Such third-party recruitment websites would assist in our recruitment service.

## **What will we do with the information you provide to us?**

All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary. We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format. We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

## **What information do we ask for, and why?**

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for, but it might affect your application if you do not.

## **Application stage**

UKG will ask for a covering letter and curriculum vitae/ application form. We may also ask that applicants complete an equal opportunities questionnaire (Equal Opportunities is not mandatory information – if you do not provide it, it will not affect your application). Equal Opportunity information will not be made available to any staff outside of the recruitment team in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics. When recruiting it is important that our practices are non-discriminatory and fair to all by adhering to the principles underpinning equality of opportunity which are covered in the United Kingdom by the Equality Act 2010 (<https://www.gov.uk/guidance/equality-act-2010-guidance>).

In asking for applicants to provide us with a covering letter and curriculum vitae/ application form, we will be requesting personal details including name and contact details. We will also ask you about your previous work experience, education, referees and for answers to questions relevant to the role you have applied for. Staff involved in the recruitment process will have access to this information. As an alternative to paper applications, UKG may use online recruitment application forms, if so, the above still applies. Shortlisting Staff involved in the recruitment process will create a shortlist of applicants to call for interview, based on the requirements of the post, in order to select the right candidate for the job.

## Assessments

UKG might ask you to participate in tests, and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test, or we might take interview notes. This information is held by UKG. If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of 1 year – a non-statutory recommended retention period. If you say yes, we would proactively contact you should any further suitable vacancies arise within this time period.

## Conditional offer

If UKG makes a conditional offer of employment we may ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability. You may therefore be required to provide:

- Proof of your identity and right to work in the UK– you will be asked to attend our office with original documents e.g. passport, we will take copies. Such copies will be kept for 6 years beyond the end of your period of work with UKG, in line with statutory recommended retention periods.
- Proof of your qualifications – if applicable, you will be asked to attend our office with original documents, we will take copies. Such copies will be kept for 6 years beyond the end of your period of work with UKG.
- We will contact your referees, using the details you provide in your application, directly to obtain references.

## Start date

If we make a final offer which is accepted, we will also ask you for the following:

- Bank details – to process salary payments;
- Emergency contact details – so we know who to contact in case you have an emergency at work;
- Details required enabling you to join our pension scheme (where applicable);
- Where applicable, we will ask you to complete an application for an Enhanced DBS (Disclosure and Barring Service) check;
- UKG's Code of Conduct requires all staff to declare if they have any potential conflicts of interest.

## How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks, references, and equal opportunities information. The 6-year time limit refers to the

timeframe in which legal proceedings must be commenced as laid down under the Limitation Act 1980. Thus, where documents may be relevant to a contractual claim, it is recommended that these be retained for at least the corresponding 6-year limitation period. If you are unsuccessful at any stage of the process, the information you have provided until that point, will be retained for 1 year (a recommended (non-statutory) retention period), from the closure of the campaign. This includes equal opportunities information, and any information generated throughout the assessment process, for example interview notes.

### **How we make decisions about recruitment?**

Final recruitment decisions are made by the recruitment team. All of the information gathered during the application process is taken into account. You are able to ask about decisions made about your application by emailing: [service@ukguardianship.com](mailto:service@ukguardianship.com).

### **Your rights Under the Data Protection Act 2018 and supplementary legislation (such as UK GDPR)**

You have rights as an individual which you can exercise in relation to the information we hold about you.

### **Complaints or queries**

UKG tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to inform us if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures. If you would like to make a complaint about the way we have processed your personal information, you can contact us at [service@ukguardianship.com](mailto:service@ukguardianship.com).

### **Access to personal information**

UKG tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 2018 and subsequent legislation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.

If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone. If we do hold information about you, you can ask us to correct any mistakes.



## **Disclosure of personal information**

We will not disclose personal data without consent. However, when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

## **How to contact us**

To make a request to UKG for any personal information we may hold, or for a copy of our privacy notice, please write to: UKGuardianship, Kinetic Business Centre, Theobald Street, Borehamwood, WD6 4PJ.

*This policy was last reviewed in September 2024 by Kit Yau.*