Employee, Host Family and Contractor Privacy Notice

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Related Documents:

Data Protection Policy
Privacy Policy
Confidentiality and Information Sharing Policy

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Oxbridge Guardians
Part of Oxbridge Group

AEGIS fully accredited to gold standard
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BRITISH BOARDING SCHOOLS NETWORK Approved Agent 2025-2026

GDPR Privacy Notice for employees, contractors and homestays.

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Introduction to Privacy Notice and relevant policies

Oxbridge Group Ltd is committed to protecting the privacy and security of your personal information. This document describes how we collect and use personal information about you prior to and for the duration of your employment/contract with us, and after your working relationship has finished in accordance with GDPR and data protection law. It applies to all employees, workers and contractors.

Oxbridge Group Ltd is a "data controller". This means that we are responsible for deciding how we hold and use personal information about you. As part of data protection law, we are required to notify you of the information collected and used within this privacy notice. This applies to current and former employees, and candidates for new positions. This notice does not form part of any contract of employment or other contract to provide services. Updates to this notice can happen at any time, and should this occur you will be notified.

This notice should be read in conjunction with our Data Protection Policy, with the 'Privacy Policy' on our website and with the relevant GDPR training as required for the role. Staff/Host Handbooks should also be referred to for wider knowledge of collection and use of data.

Our Data Protection Officer is Steph Gilbert: steph.gilbert@oxbridgeguardians.co.uk; if you have any specific privacy concerns you can contact her directly.

Data protection principles

We will comply with data protection law. This says that the personal information we hold about you must be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept securely.

The kind of information we hold about you

- Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data). There are "special categories" of more sensitive personal data which require a higher level of protection.

We collect, store, and use the following categories of personal information about you:

- Personal contact details such as name, title, addresses, telephone numbers, and

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personal email addresses.
- Dates of birth, marriage and divorce.
- Gender.
- Marital status and dependents.
- Next of kin, emergency contact and death benefit nominee(s) information.
- National Insurance number.
- Bank account details, payroll records and tax status information.
- Salary, annual leave, pension and benefits information.
- Start date, leaving date.
- Copy of driving licence, passport, birth and marriage certificates, decree absolute.
- Recruitment information (including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process).
- Full employment records (including contract, terms and conditions, job titles, work history, working hours, promotion, absences, attendances, training records and professional memberships).
- Compensation history.
- Performance and appraisal information.
- Disciplinary and grievance information.
- Secondary employment and volunteering information
- Photographs, videos.
- Accident book, first aid records, injury at work and third party accident information.
- Evidence of how you meet Enhanced DBS Checks/Criminal Record Checks
- Evidence of your right to work in the UK/immigration status

We will also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions.
- Trade union membership.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions/allegations and offences

Collection of Personal Information

Personal information is generally collected through the application and recruitment process, directly from the candidate and occasionally through an employment agency/background check provider. We will sometimes collect additional information from third parties including;

- His Majesty's Revenue and Customs HMRC
- Disclosure Barring Service (DBS)
- Former Employers (references)

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How we will use information about you

We will only use your personal information when the law allows us to. Most commonly, we will use your personal information in the following circumstances:

- Where it is necessary for performing the contract we have entered into with you.
- Where we need to comply with a legal obligation.
- There can be rare occasions where it becomes necessary to use your personal information to protect your interests (or someone else's interests).

We need all the categories of information in the list above to enable us to;

- perform our role as employer;
- to enable us to comply with legal obligations,
- to carry out our functions as a Guardianship Organisation.

The situations in which we will process your personal information are listed below.

- Making a decision about your recruitment or appointment.
- Determining the terms on which you work for us.
- Checking you are legally entitled to work in the UK
- Paying you and, if you are an employee, deducting tax and National Insurance contributions.
- Liaising with your pension provider, providing information about changes to your employment such as promotions, changing in working hours.
- General administration of the contract we have entered into with you.
- Business management and planning, including accounting and auditing.
- Conducting performance reviews, managing performance and determining performance requirements.
- Making decisions about salary reviews and compensation.
- Assessing qualifications for a particular job or task, including decisions about promotions.
- Gathering information relating to possible grievance or disciplinary matters and associated hearings.
- Making decisions about your continued employment or engagement.
- Education, training and development requirements.
- Dealing with legal disputes involving you, or other employees, workers and contractors, including accidents at work.
- Ascertaining your fitness to work, managing sickness absence.
- Complying with health and safety obligations.
- To prevent fraud.
- Dealing with Freedom of Information Act/Environmental Information Regulations requests
- Equal Opportunities monitoring
- For our regulatory bodies

Some of the purposes will overlap and there can be several grounds which justify our use of your personal information. If you fail to provide personal information If you fail to provide certain information when requested, we will not be able to fully perform the contract we have entered with you (such as paying you or

providing a benefit), or we could be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

Change of purpose

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.
If we need to use your personal information for an unrelated or new purpose, we will notify you and we will explain the legal basis which allows us to do so. Please note that we will if necessary process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We will, if necessary, process special categories of personal information in the following circumstances:

- Where we need to carry out our legal obligations or exercise our employment-related legal rights and in line with our data protection policy
- Where it is in line with our data protection policy, it is substantially in the public interest to do so and necessary for:
    - performing our functions as a Guardianship Organisation
    - equal opportunities monitoring.
    - administering our pension scheme
    - preventing or detecting unlawful acts
- Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.
- In some circumstances, we will process this type of information where it is needed in relation to legal claims

Employer Responsibilities

We will use your particularly sensitive personal information in the following ways:

- We will use information relating to leave of absence; this can include sickness absence or family related leave, to comply with employment and other laws.
- We will use information about your physical or mental health, or disability status, to ensure your health and safety in the workplace and to assess your fitness to work, to adequately follow Health and Safety guidance.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.
- We will use trade union membership information to pay trade union premiums, register the status of a protected employee and to comply with employment law obligations.

In limited circumstances, we may approach you for your written consent to allow us to process certain particularly sensitive data. If we do so, we will provide you with full details of the information requested and reasoning so that you can carefully consider whether you wish to consent. You should be aware that it is not a condition of your contract with Oxbridge Group that you agree to any request for consent.

Information about criminal convictions

As the roles at Oxbridge Group Ltd generally involve regulated activity with young people, most roles are subject to enhance DBS Checks and Children's Barred List Checks. We do all checks through an outside provider – Checks Direct. This information is collected at the application stage, and will be renewed every three years, or annually if on the Updates system.

Data sharing

We will in some circumstances have to share your data with third parties, including **Schools, Parents, Agents, Contractors and Regulatory Bodies (AEGIS & BSA)**.

We require third parties to respect the security of your data and to treat it in accordance with the law. We will in some circumstances transfer your personal information outside the EU **(to Parents and/or Agents)**. If we do, you can expect a similar degree of protection in respect of your personal information.

- We will share your personal information with third parties where required by law**.**
- where it is necessary administer the working relationship with yo**u.**
- where it is in the public interest to do so
- where it is necessary for the performance of our functions as a **Guardianship Organisation.**

This will, in some circumstances, involve sharing special categories of personal data and, where relevant, data about criminal convictions/allegations.

The following activities are carried out by third-party service providers:

- payroll
- pension administration
- IT services
- security vetting (enhanced DBS Checks)

All our third-party service providers are required 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 permit them to process your personal data for specified purposes and in accordance with our instructions.

If required, we will need to share your personal information with a regulatory body or to otherwise comply with the law.

Transferring information outside the EU

Although all data is stored and held on servers within the UK, some of your personal data may be processed offshore by our colleagues and partners internationally, due to the nature of the industry and Guardianship Services. Your personal data receives the same level of protection when processed offshore as it does onshore. We use an encrypted system, with the whitepaper available here: Podio Security Overview.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.
Details of storage periods for different aspects of your personal information are available in our Data Protection Policy. The appropriate period is decided based on amount, nature, sensitivity and potential risk of harm of unauthorised use/disclosure.

In some circumstances we will anonymise your personal information so that it can no longer be associated with you, in which case we will use such information without further notice to you. Once you are no longer an employee, contractor or homestay of the company we will retain and securely destroy your personal information in accordance with our Data Protection Policy.

Rights of access, correction, erasure, and restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your working relationship with us. Your rights in connection with personal information - by law you have the right to:

- Request access to your personal information (commonly known as a "data subject access request").
- Request correction of the personal information that we hold about you.
- Request erasure of your personal information.
- Object to processing of your personal information
- Request the restriction of processing of your personal information.
- Request the transfer of your personal information to another party.
- Right to withdraw consent In the limited circumstances where you have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact steph.gilbert@oxbridgeguardians.co.uk

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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