



Data Protection Policy

OUR COMMITMENT

Study Links International Limited (Study Links) is committed to protecting the safety and security of our users' data, including students, staff, group leaders, agents, homestays, and parents.

We are committed to handling all personal data collected in line with the data protection principles and the Data Protection Act (DPA 1998) and the General Data Protection Regulation (2018).

Changes to data protection legislation shall be monitored and implemented in order to remain compliant with all requirements.

The member(s) of staff responsible for data protection are: Ailie Fan.

We are also committed to ensuring that staff are aware of data protection policies, legal requirements and adequate training is provided to them.

The requirements of this policy are mandatory for all staff employed by Study Links and any third party contracted to provide services to the organisation.

This policy is supplemented by a privacy notice for students, agents, homestays & staff. (see links at the bottom of the page)

NOTIFICATION:

Breaches of personal or sensitive data shall be notified immediately to the individual(s) concerned and the ICO.

PERSONAL AND SENSITIVE DATA:

All data within Study Links' control shall be identified as personal, sensitive or both to ensure that it is handled in compliance with legal requirements and access to it does not breach the rights of the individuals to whom it relates.

The definitions of personal and sensitive data shall be as those published by the ICO for guidance: <https://ico.org.uk/for-organisations/guide-to-data-protection/key-definitions/>

The principles of the Data Protection Act and the General Data Protection Regulation shall be applied to all data processed:

1. Processed fairly and lawfully
2. Obtained only for lawful purposes, and is not further used in any manner incompatible with those original purposes
3. Accurate and, where necessary, kept up to date
4. Adequate, relevant and not excessive in relation to the purposes for which it is processed
5. Not kept for longer than is necessary for those purposes
6. Processed in accordance with the rights of data subjects under the DPA
7. Protected by appropriate technical and organisational measures against unauthorised or unlawful processing and against accidental loss, destruction or damage
8. Not transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection of the personal information

FAIR PROCESSING:

We shall be transparent about the intended processing of data and communicate these intentions via notification to staff, agents, parents, homestays, group leaders and students prior to the processing of individual's data.

Notifications shall be in accordance with ICO guidance and, where relevant, be written in a form understandable by those defined as 'Children' under the legislation.

The intention to share data relating to individuals to an organisation outside of Study Links shall be clearly defined and details of the basis for sharing given (e.g. Transport companies, AEGIS and British Council inspectors). Data will be shared with external parties in circumstances where it is a legal requirement to provide such information (e.g. HMRC, ICO)

Any proposed change to the processing of individual's data shall first be notified to them.

DATA SECURITY:

In order to assure the protection of all data being processed and inform decisions on processing activities, we shall undertake an assessment of the associated risks of proposed processing and equally the impact on an individual's privacy in holding data related to them.

Risk and impact assessments shall be conducted in accordance with guidance given by the ICO.

Security of data shall be achieved through the implementation of proportionate physical and technical measures. This is achieved through restricted access, password protection and staff training. Nominated staff shall be responsible for the effectiveness of the controls implemented and reporting of their performance.

The security arrangements of any organisation with which data is shared shall also be considered and these organisations shall provide evidence of the competence in the security of shared data.

DATA ACCESS REQUESTS (SUBJECT ACCESS REQUESTS):

All individuals whose data is held by us, have a legal right to request access to such data or information about what is held. We shall respond to such requests within 40 days and they should be made in writing to: Study Links, 4 Park Bottom, Bradford, West Yorkshire, BD12 0UA or office@studylinks.co.uk

A charge may be applied to process the request.

PHOTOGRAPHS AND VIDEO:

Images of students, homestays, group leaders, parents and staff may be captured during various activities as part of our service.

Unless prior consent from students/homestays/group leaders/parents/staff has been given, we will not utilise such images for publication or Study Links marketing or communication to external sources.

DATA DISPOSAL:

Study Links recognises that the secure disposal of redundant data is an integral element to compliance with legal requirements and an area of increased risk.

All data held in any form of media (paper, tape, electronic) shall be destroyed or eradicated to agreed levels meeting recognised national standards, with confirmation at completion of the disposal process.

Disposal of IT assets holding data shall be in compliance with ICO guidance:

https://ico.org.uk/media/for-organisations/documents/1570/it_asset_disposal_for_organisations.pdf

To see our Privacy Notice – Agents & Institution Staff (e.g. university / school) 2025 [click here](#)

To see our Privacy Notice – Students 2025 [click here](#)

To see our Privacy Notice – Homestays 2025 [click here](#)

Review

This policy is reviewed annually taking into account any changes in legislation, practice or roles concerned throughout the year.