



Langford International  
Education Consultancy Ltd.

1 Holm Lodge, St. Michael's Road, London NW2 6XH, UK

**Langford International Education Consultancy Ltd (International Language and Literature Teachers' Cooperative) GDPR Policy on Safeguarding and Privacy: Guidelines for Clients  
(Students, Parents and Schools)**

*Parents or (in the case of boarding schools the IB Coordinator or Language Coordinator) are asked to share and discuss this statement and guidelines with students using our services the importance of internet safety, privacy matters and the risks inherent with sharing of personal data with their children/ students. We recommend that an adult always be present in the teaching environment or home or in the boarding facilities when they are having their face-to-face video calls with our ILLTC language consultants. You will be asked to confirm your agreement to these guidelines on the application form.)*

*To protect privacy, ILLTC Consultants are asked if possible to use the Student's school email addresses and are discouraged from using the Student's personal email addresses. (\*At times when we are responding to applications before the Student has started at the IB school and in anticipation of starting the IBDP, a School email address is not yet available. In such cases, the Student and Consultant should use the Student's school email address as soon as this is available and the personal email address should be deleted.) The Student's school email addressed should be used to communicate and also to arrange video calls using platforms such as Microsoft Teams or Google Meets. If other platforms are used (e.g. WhatsApp or Facetime), this should be approved by the School Liaison and Mary Langford should be notified.*

*As Langford International Education Consultancy Ltd (Langford IEC) which manages the International Language and Literature Teachers' Cooperative (ILLTC) is based in the UK, this document is to help ensure compliance with the EU General Data Protection Regulations (GDPR) May 2018 and the UK's Data Protection Act (DPA) 2018.*

**The information in the application form will be shared with the following people\*:**

- The IB Coordinator and/or Language Coordinator at your present school as designated in the application form by the client or, in the case of a transfer, any subsequent schools as long as you remain our client. In the case of students in boarding school the information may also be shared with the student's main advisor/form tutor.
- The ILLTC Academic Advisor who liaises with the language tutor about the programme and who approves the text selection and oversees the teaching.
- The prospective ILLTC language tutor.
- The information in this form may also be shared with the person designated as responsible for payment of fees.
- You may from time to time receive emails from us about the programme, payment of fees, or asking for feedback about the programme.

\* As Data Controller, the EU GDPR and the UK DPA requires that Langford International Education Consultancy (ILLTC) is responsible for ensuring that the organisation's/individuals with whom we share PII, process and handle the data in



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accordance with GDPR. Please note that we work with schools and tutors outside of the EEA and they may not be fully compliant with GDPR requirements and therefore may only adhere to this by agreement with ILLTC and not because of GDPR statutory requirements as they are outside EEA jurisdiction.

### **How long do we keep your information?**

- Your data will be kept for up to 7 years by Langford IEC after you complete your IB Diploma. This means that for younger students we will keep your information until such time you reach the age when you should have graduated. This is so that in case there are any questions about your work eg while at university, we will be able to access this. The data may also be required by LIEC for tax/financial record-keeping purposes.
- ILLTC language tutors are asked to keep your information for up to 1 year after the student completes the IB Diploma again in the event there are any questions about the work once the student reaches university. (Please note that information shared with the student's school will be subject to that school's data protection policies and procedures as this data may form part of the student's record of study with that institution.)
- Information on invoices sent to you may be shared with Langford International Education Consultancy's appointed accountants (Goldwin's in London) who have access to all business documents for the preparation of annual accounts to be reported to HMRC and for quarterly VAT report.

### **How your information is used**

As limited company registered in the UK, Langford International Education Consultancy (International Language and Literature Teacher's Cooperative) will only use your data fairly and lawfully in accordance with our obligations under the European General Data Protection Regulations (GDPR), May 2018 and the UK's DPA, 2018. This means that we will process your data in a way which respects the Data Protection Principles set down in the Regulations and your rights under the GDPR.

The GDPR and DPA requires us to keep your data secure. This means that your confidentiality will be respected, and all appropriate measures will be taken to prevent unauthorised disclosure. Although it is not possible to state every purpose for which your information will be used, the following are examples of how it is likely to be used while you are a student:

- To administer your studies and record academic achievements (e.g. your language course, mock testing and assessments, and other feedback sent to you via email.)
- To assist in pastoral and welfare needs (e.g. the counselling service and services to students with disabilities) as observed by the language tutor. This is a very rare occurrence.
- To administer financial aspects of your registration as a student (e.g. collection of fees, debt collection)
- To produce management statistics and to conduct research into the effectiveness of our services (though these are anonymised)



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- To communicate relevant support or other group specific information direct to applicable students.
- Text messaging for relevant activities or reminders about Skype/Facetime meetings times.
- To provide (at the student's request) any information that may be helpful for university applications.
- For security and disciplinary purposes
- For internal and external audits, and quality assurance exercises
- For assessment, marketing and 'alumni' purposes should you agree to be in touch once the IB Diploma is completed.

(Most of our data is kept in electronic form and access is protected by two passwords. All of our tutors who are based worldwide have read the guidelines and acknowledged their understanding of GDPR practice relating to children.)

### **How long do we keep your information?**

We will hold your personal data on our systems for as long as you are a client of the LIEC, for a period of 7 years after you have ceased to be a client and for as long afterwards as it is necessary to comply with our legal obligations. We will review your personal data every year to establish whether we are still entitled to process it. If we decide that we are not entitled to do so, we will stop processing your personal data except that we will retain your personal data in an archived form in order to be able to comply with future legal obligations, e.g. compliance with tax requirements and exemptions, and the establishment exercise or defence of legal claims.

### **Understanding your rights**

You have a number of rights under the GDPR and DPA in respect of the information which the ILLTC holds about you, and how we can use that information. These include:

- to access your personal data
- to be provided with information about how your personal data is processed
- to have your personal data corrected
- to have your personal data erased in certain circumstances
- to object to or restrict how your personal data is processed
- to have your personal data transferred to yourself or to another business in certain circumstances.

This document has been prepared using guidance of the Independent Communications Office (UK) who provide the following guidelines:

### **Privacy Notices**

- Our privacy notices are clear, and written in plain, age-appropriate language.
- We use child friendly ways of presenting privacy information, such as: diagrams, cartoons, graphics and videos, dashboards, layered and just-in-time notices, icons and symbols.
- We explain to children why we require the personal data we have asked for, and what we will do with it, in a way which they can understand.



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- As a matter of good practice, we explain the risks inherent in the processing, and how we intend to safeguard against them, in a child friendly way, so that children (and their parents) understand the implications of sharing their personal data.
- We tell children what rights they have over their personal data in language they can understand.
- As a matter of good practice, if we are relying upon parental consent then we offer two different versions of our privacy notices; one aimed at the holder of parental responsibility and one aimed at the child.

### **The Child's Data Protection Rights**

- The child's data protection rights
- We design the processes by which a child can exercise their data protection rights with the child in mind and make them easy for children to access and understand.
- We allow competent children to exercise their own data protection rights.
- If our original processing was based on consent provided when the individual was a child, then we comply with requests for erasure whenever we can.
- We design our processes so that, as far as possible, it is as easy for a child to get their personal data erased as it was for them to provide it in the first place.

Source:

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/children-and-the-uk-gdpr/> accessed 13 April 2024. 27 Sep 2021

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