

Data Protection Policy

Bristol International Student Centre,
45 Woodlands Road,
Bristol,
BS8 1UT
Charity Number: 298035

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1. Policy Implementation

Policy Prepared by

Tirzah L Jones (Operations & Events Manager)
Grace Kirby (Operations and Events Assistant Manager)

Approved by

Jacqueline Conradie-Faul (Director)

Accepted by

Paul Smith (on behalf of the Board of Trustees)

Date agreed

23rd May 2018

Date Implemented

25th May 2018

2. Introduction

Bristol International Student Centre (BISC) needs to gather and use certain information about individuals.

These individuals include students, staff, trustees, volunteers, supporters and contractors, along with many others the organization has a relationship with or may need to contact.

This policy describes how this personal data must be collected, handled and stored to meet the organization's data protection standards – and to comply with the law.

a. Why this policy exists

This Data Protection Policy ensures Bristol International Student Centre (BISC) and Bristol International Trust:

- Complies with data protection law and follows good practice
- Protects the rights of students, staff, volunteers, supporters, contractors and trustees
- Is open about how it stores and processes individuals' data
- Protects itself from the risks of a data breach

b. Data Protection law

The EU General Data Protection Regulation (GDPR) describes how organizations must collect, handle and store personal data.

These rules apply whether the data is stored, electronically, on paper or any other materials.

To comply with the law, personal information must be collected and used fairly, stored safely and not disclosed unlawfully.

Eight important principals underpin the GDPR; they say that personal data must be:

1. Be processed fairly and lawfully
2. Be obtained only for specific, lawful purposes
3. Be adequate, relevant and not excessive
4. Be accurate and kept up-to-date
5. Not be held for longer than necessary
6. Be processed in accordance with the rights of the individuals
7. Be protected in appropriate ways
8. Not be transferred outside the EEA unless that country or territory also ensures an adequate level of protection

c. Policy Scope

This policy applies to

- Bristol International Trust
- Bristol International Student Centre (BISC)
- All staff and volunteers
- All contractors, suppliers, supporters and other people or organizations partnering with Bristol International Student Centre (BISC) and Bristol International Trust.

It applies to all personal data that the organization holds relating to identifiable individuals, even if that information technically falls outside of the GDPR. This can include:

- Names of individuals
- Postal address
- Email address
- Telephone numbers
- Financial data
- ... plus any other information relating to individuals

d. Data Protection Risks

This policy helps to protect Bristol International Student Centre (BISC) and Bristol International Trust from some very real data security risks, including:

- Breaches of confidentiality
- Failing to offer choices
- Reputational damage

e. In the event of a Breach

i. What is a personal data breach?

A personal data breach means a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data. This includes breaches that are the result of both accidental and deliberate causes. It also means that a breach is more than just about losing personal data.

Example

Personal data breaches can include:

- access by an unauthorized third party;
- deliberate or accidental action (or inaction) by a controller or processor;
- sending personal data to an incorrect recipient;
- computing devices containing personal data being lost or stolen;
- alteration of personal data without permission; and
- loss of availability of personal data.

ii. General ICO guidelines to responding to a breach

According to guidelines from ICO when a personal data breach has occurred, we need to establish the likelihood and severity of the resulting risk to people's rights and freedoms. If it's likely that there will be a risk then we will notify the ICO; if it's unlikely, then we don't have to report it. However, if we decide we don't need to report the breach, we need to be able to justify this decision, which we will carefully document. In assessing risk to rights and freedoms, we will focus on the potential negative consequences for individuals. This means that a breach can have a range of adverse effects on individuals, which include emotional distress, and physical and material damage. Some personal data breaches will not lead to risks beyond possible inconvenience to those who need the data to do their job. Other breaches can significantly affect individuals whose personal data has been compromised. We will assess this case-by-case, looking at all relevant factors.

f. General Guidelines

- The only people able to access data covered by this policy should be those who need it for their work.
- Data should not be shared informally. Where access to confidential information is required that they are not normally entitled to employees/volunteers can request it from their line manager.
- Bristol International Student Centre (BISC) will provide training to all paid and unpaid staff and core team members to help them understand their responsibilities when handling data.
- Paid and unpaid staff and core team members will keep all data secure by taking sensible precautions and following the detailed and general guidelines outlined in this policy.
- Strong passwords will be used and not disclosed to unauthorized personnel.
- Personal data should not be disclosed to unauthorized people either within the company or externally.
- Data should be regularly reviewed and updated. If it is found to be out-of-date or no longer required, it should be deleted and disposed of.
- Paid and unpaid staff and core team members should request help from their line manager or data protection officer if unclear about anything.

3. Data Storage

Bristol International Student Centre (BISC) and Bristol International Trust undertakes to store any individual's data using the following specific guidelines

a. Electronic

- Only current and relevant data will be stored
- All computers will be password protected
- Only 'paid and unpaid staff and core team members' will have access to these passwords
- When computers are left unattended they will be locked or turned off
- Any *NON paid and unpaid staff and core team members* will be monitored at all times when using the computers
- Any data needing to be taken off the premises for those who work remotely and need it for their work will keep it on a password protected computer. If this computer is accessible by any others then the individual files will be password protected.
- Any cloud or other backups will also be secured in the appropriate manner
- Where *paid and unpaid staff and core team members* have, with permission, contact details on phones or tablets they are responsible for ensuring they are password protected.

b. Paper

- Only current and relevant data will be stored
- Paper documents will be limited to necessary data
- Any personal identifiable data will be kept in a locked filing cabinet or drawer
- Only *paid and unpaid staff and core team members* will have access to the keys
- When the office is unattended all of these will be locked
- Any 'working documents' such as those needed for trips will be shredded upon completion of that trip or event.
- *Paid and unpaid staff and core team members* will be individually responsible for making sure that any personal paper records they need for their work will be kept securely.

- In the evenings, weekends and holidays the office is secured by two locked doors within the building: an inner-office door and an outer-office door.
- If it is necessary for paper documents to be removed from the premises then the *paid and unpaid staff and core team member* is responsible for ensuring that they know where this is at all times and is secure.

4. Subject Access Requests

All individuals who are the subjects of personal data held by Bristol International Student Centre (BISC) and Bristol International Trust are entitled to be told:

- What data is held and why
- How to gain access to it
- How to keep it up-to-date
- How the organization is meeting its data protection obligations

Subject access requests can be made in writing to the *Data Protection Officer*, using the office address: 45 Woodland Rd, Bristol BS8 1UT.

The Data Protection Officer will always verify the identity of those making the request before handing over any information

5. Response to breaches

a. In the event of a Breach

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iii. Bristol International Student Centre (BISC) and Bristol International Trust Responses

Based on these guidelines Bristol International Student Centre (BISC) and Bristol International Trust will follow the following outlines

1. Anyone aware of a breach or potential breach must **immediately** report it to the Data Protection Officer or their line manager.
2. Following any breach, Bristol International Student Centre (BISC) will assess the likelihood and severity of the resulting risk to people's rights and freedoms in conjunction with a data protection advisor. BISC will also seek any updated advice on the ICO website.
3. If this breach is not deemed reportable, a form will be completed outlining
 - a. What the breach was
 - b. Why the breach occurred
 - c. How we will attempt to safeguard against similar breaches in future
 - d. Why it was deemed none reportable
4. If reportable, this will be done to the ICO following the guidelines outlined on their website.

6. Providing Information

Bristol International Student Centre (BISC) and Bristol International Trust aims to ensure that individuals are aware that their data is being processed and that they understand

- How their data is being used
- That their data is stored to required standards
- How to exercise their rights

This will be presented in both a long and short data protection statement, as demonstrated further in this document.

7. Policy Statements

Please see the organization's concise and detailed privacy policies below.

a. Short BISC Privacy Policy Statement

How we use your personal information

Last updated May 2018.

Your information will be held by the Bristol International Trust, registered charity number - 298035.

Who we are

Founded in 1976, Bristol International Trust, better known as BISC (Bristol International Student Centre), provides a *home away from home* to ALL international students, their family and friends. We promote international understanding and multicultural exchange in support of internationalization in the Bristol area through a wide range of social and cultural activities, trips and events; creating a community for the wellbeing of every international student by offering weekly meals, advice and support at our drop-in centre. BISC is a registered charity with a Christian ethos supporting international students of all faiths and no faith. Everyone is welcome at BISC.

You can find out more about us at www.bisc.org.uk

If you have any questions, or want more details about how we use your personal information, you can call us on 0117 9159826.

How we use your personal information

Bristol International Student Centre (BISC) operates under the registered charity name of Bristol International Trust. This privacy notice is to let you know how the organization promises to look after your personal information. This includes what you tell us about yourself, what we learn by having you as a "Friend of BISC", and the choices you give us about what marketing you want us to send you. This notice explains how we do this and tells you about your privacy rights and how the law protects you.

Our Privacy Promise

We promise:

- To keep your data safe and private.
- Not to sell your data.
- To give you ways to manage and review your marketing choices at any time.

If you choose not to give personal information

If you have a contract with us then we may need to collect personal information from you relating to that contract.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It could mean that we cancel the contract you have with us.

Any data collection that is optional would be made clear at the point of collection.

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

Contact us

Bristol International Student Centre (BISC), 45 Woodland Road, Clifton, Bristol, BS8 1UT.
0117 9159826 bisc@bisc.org.uk

b. Long BISC Privacy Policy Statement

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More information on the organization can be found at www.bisc.org.uk

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You can find out more about us at www.bisc.org.uk

If you have any questions, or want more details about how we use your personal information, you can call us on 0117 9159826.

Groups of Personal Information

We use different kinds of personal information, and group them together like this.

Type of personal information	Who it is relevant to	Description
Financial	Contractors, Paid and unpaid staff	Bank details, National Insurance number and employment status, all of which enable to process payroll effectively.
Contact	Tenants, Volunteers, Students, Contractors, Paid and unpaid staff, Trustees, Supporters, Hosts	How to contact you.
Socio-Demographic	Tenants, Volunteers, Students	This includes details about your education and place of study.
Contractual	Tenants, Contractors, Paid and unpaid staff, Trustees, Supporters, Hosts	Details about the products or services we provide to you.
Communications	Tenants, Volunteers, Students, Contractors, Paid and unpaid staff, Trustees, Supporters, Hosts	What we learn about you from letters, emails and conversations between us.
Documentary Data	Tenants, Paid and unpaid staff	Details about you that is stored in documents in different formats, or copies of them. This could include things like your passport, visa, driver's license or birth certificate.
Consents	Tenants, Volunteers, Students, Contractors, Paid and unpaid staff, Trustees, Supporters, Hosts	Any permissions, consents or preferences that you give us. This includes things like how you want us to contact you.
Identity Number	Tenants, Students, Paid and unpaid staff	A number or code given to you by a government to identify who you are, such as a National Insurance number if you are employed; passport or visa for tenants; or student numbers.

How the law protects you.

As well as our Privacy Promise, your privacy is protected by law. This section explains how that works.

Data Protection law says that we are allowed to use personal information only if we have a proper reason to do so. This includes sharing it outside Bristol International Trust. The law says we must have one or more of these reasons:

- To fulfill a contract we have with you, or
- When it is our legal duty, or
- When it is in our legitimate interest, or
- When you consent to it.

A legitimate interest is when we have a business or commercial reason to use your information. But even then, it must not unfairly go against what is right and best for you. If we rely on our legitimate interest, we will tell you what that is.

Here is a list of all the ways that we may use your personal information, and which of the reasons we rely on to do so. This is also where we tell you what our legitimate interests are.

What we use your personal information for	Our reasons	Our legitimate interests
<ul style="list-style-type: none"> • To manage our relationship with you. • To develop and carry out marketing activities. • To provide advice or guidance about our services and products. 	<ul style="list-style-type: none"> • Your consent. • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Keeping our records up to date, working out which of our services and products may interest you and telling you about them. • Developing services and products, and what we charge for them. • Seeking your consent when we need it to contact you. • Being efficient about how we fulfil our legal duties.
<ul style="list-style-type: none"> • To obey laws and regulations that applies to us. • To respond to complaints and seek to resolve them. 	<ul style="list-style-type: none"> • Our legal duty. 	<ul style="list-style-type: none"> • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.
<ul style="list-style-type: none"> • To run our business in an efficient and proper way. This includes managing our financial position, business capability, planning, communications, corporate governance, and audit. 	<ul style="list-style-type: none"> • Our legitimate interests. • Our legal duty. 	<ul style="list-style-type: none"> • Complying with regulations that apply to us. • Being efficient about how we fulfil our legal and contractual duties.

Where we collect personal information from

We may collect personal information about you from these sources:

Data you give to us:

- When you apply for our trips or events online
- When you talk to us on the phone or in the office
- In response to the weekly email
- Emailing us

Data we collect when you use our services. This includes the amount, frequency, type, location, origin and recipients:

- Payment and transaction data.
- Profile and usage data. We gather this data from, using cookies and other internet tracking software.

Data from third parties we work with:

- Agents working on our behalf
- For any accidents or emergencies, we may ask your GP or other medical professionals to confirm information. We will only do this if we get your consent first.

Who we share your personal information with

We may share your personal information with

- Parties within the Bristol International Trust.
- Parties you ask us to share your data with.

The information we use

These are some of the kinds of personal information that we use:

- Name and Surname
- Contact details, such as email addresses and phone numbers
- Date of birth if registered on our Local Link database
- Residential address if registered on our Local Link database
- Your home address in your country of origin, if you are a tenant with us

If you choose not to give personal information

We may need to collect personal information by law, or under the terms of a contract we have with you.

If you choose not to give us this personal information, it may delay or prevent us from meeting our obligations. It could mean that we cannot enter into a contract with you.

Any data collection that is optional would be made clear at the point of collection.

Marketing

We may use your personal information to tell you about relevant events and trips. This is what we mean when we talk about 'marketing'.

The personal information we have for you is made up of what you tell us.

We can only use your personal information to send you marketing messages if we have either your consent or a 'legitimate interest'. That is when we have a business reason to use your information. It must not unfairly go against what is right and best for you.

You can ask us to stop sending you marketing messages by contacting us at any time.

We may ask you to confirm or update your information. We will also ask you to do this if there are changes in the law, regulation, or if you change address each academic year.

If you change your mind you can update your choices at any time by contacting us.

How long we keep your personal information

We will keep your personal information for as long as you are a "friend of BISC".

After you stop being a regular "friend of BISC", we may keep your data for up to 10 years for one of these reasons:

- To respond to any questions or complaints.
- To show that we treated you fairly.
- To maintain records according to rules that applies to us.
- To inform you of any Alumni events or information.

We may keep your data for longer than 10 years if we cannot delete it for legal, regulatory or technical reasons. We may also keep it for research or statistical purposes. If we do, we will make sure that your privacy is protected and only use it for those purposes.

How to get a copy of your personal information

You can access your personal information we hold by writing to us at this address:

Bristol International Student Centre, 45 Woodland Road, Clifton, Bristol, BS8 1UT. Contacting us on 0117 9159826, or emailing at bisc@bisc.org.uk

Letting us know if your personal information is incorrect

You have the right to question any information we have about you that you think is wrong or incomplete. Please contact us if you want to do this.

If you do, we will take reasonable steps to check its accuracy and correct it.

What if you want us to stop using your personal information?

You have the right to object to our use of your personal information, or to ask us to delete, remove, or stop using your personal information if there is no need for us to keep it. This is known as the 'right to object' and 'right to erasure', or the 'right to be forgotten'.

There may be legal or other official reasons why we need to keep or use your data. But please tell us if you think that we should not be using it.

We may sometimes be able to restrict the use of your data. This means that it can only be used for certain things, such as legal claims or to exercise legal rights. In this situation, we would not use or share your information in other ways while it is restricted.

You can ask us to restrict the use of your personal information if:

- It is not accurate.
- It has been used unlawfully but you don't want us to delete it.
- It is not relevant any more, but you want us to keep it for use in legal claims.
- You have already asked us to stop using your data but you are waiting for us to tell you if we are allowed to keep on using it.

If you want to object to how we use your data, or ask us to delete it or restrict how we use it, please contact us.

How to withdraw your consent

You can withdraw your consent at any time. Please contact us if you want to do so.

If you withdraw your consent, we may not be able to provide certain products or services to you. If this is so, we will tell you.

How to complain

Please let us know if you are unhappy with how we have used your personal information. You can contact us by writing to us at this address: **Bristol International Student Centre**, 45 Woodland Road, Clifton, Bristol, BS8 1UT. Calling us on 0117 9159826, or emailing at bisc@bisc.org.uk

You also have the right to complain to the Information Commissioner's Office. Find out on their website how to [report a concern](#).

Cookies

To find out more about how we use cookies please see our cookie notice.

Contact us

Bristol International Student Centre, 45 Woodland Road, Clifton, Bristol, BS8 1UT
0117 9159826
bisc@bisc.org.uk