British
Guardianship

Data Protection Policy

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Data Policy Register of Data Controllers

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Information Commissioner's Office

Organisation Name: **Study First Group Limited**
Registration Reference: **ZA107984**
Registered with the ICO: **30/03/2015**
Last ICO Review: **27/03/2026**
Next ICO Review: **27/03/2027**
Organisation Address: **International Student Services, Sussex Innovation Centre, Science Park Square, Brighton, BN1 9SB, United Kingdom**
Companies House Registration Number: **07087579**
Nature of work description: **Education**

Description of processing

The following is a broad description of the way this organisation/data controller processes personal information. To understand how your own personal information is processed you may need to refer to any personal communications you have received, check any privacy notices the organisation has provided or contact the organisation to ask about your personal circumstances.

Reasons/purposes for processing information

We process personal information to enable us to provide consultancy and advisory services, to promote our services, to maintain our own accounts and records and to support and manage our employees.

Type/classes of information processed

We process information relating to the above reasons/purposes. This information may include: personal details, family, lifestyle and social circumstances, business activities of the person whose personal information we are processing, goods and services provided, financial details, education details, employment details .

We also process sensitive classes of information that may include: physical or mental health details, offences and alleged offences, racial or ethnic origin, religious or other beliefs of a similar nature.

Who the information is processed about:

We process personal information about our customers, clients and employees, complainants and enquirers, suppliers, advisers and other professional experts.

Who the information may be shared with:

We sometimes need to share the personal information we process with the individual themself and also with other organisations. Where this is necessary we are required to comply with all aspects of the Data Protection Act (DPA). What follows is a description of the types of organisations we may need to share some of the personal information we process with for one or more reasons.

Where necessary or required we share information with:

Business associates and other professional advisers, family, associates and representatives of the person whose personal data we are processing, financial organisations, current, past or prospective employers, educators and examining bodies, suppliers and services providers, traders in personal data.

Transfers

It may sometimes be necessary to transfer personal information overseas. When this is needed information may be transferred to countries or territories around the world. Any transfers made will be in full compliance with all aspects of the data protection act.

Privacy & data protection policy for our customers

StudyFirst Group Ltd. commitment to protecting privacy and data protection has been adopted as a key policy which underpins both this Data Protection Policy and other associated policies used by StudyFirst Group Ltd. and its customers.

Purpose of this data protection policy and its coverage

This policy sets out StudyFirst Group Ltd. approach to protecting personal data and explains your rights in relation to how we may process personal data. For the purposes of these documents "Study First Group Ltd." includes the following companies; StudyFirst Group, BritishUni, BritishGuardianship, and UK Study. We reserve the right to change or update this policy at any time. We make sure that any significant changes will be posted, and our clients will be notified.

Data Retention Policy

Study First Group Ltd is committed to maintaining accurate records and effective record-keeping systems. In doing so, we consider the following key factors:

- Efficiency and effectiveness in storing records and data
- The confidential nature of the information retained
- Security measures associated with our record-keeping systems
- Considerations around privacy and data disclosure
- Ease of access to records when needed

Safeguarding information is processed and retained under the lawful bases of compliance with legal obligations and safeguarding responsibilities. Where relevant, special category data is processed in accordance with safeguarding requirements to protect the welfare of children and young people.

Retention Schedule

We store information about host families and students electronically and retain it according to the durations outlined below. Study First Group Ltd follows the standard retention periods specified in this schedule.

Student Records

- **Admissions records:** Retained for 6 years from the date of admission
- **Guardianship and student welfare records:** Retained until the student reaches 25 years of age.
- **Guardianship and admissions enquiries:** If the enquiry does not result in enrolment, records are deleted 12 months after initial receipt
- **Child protection and safeguarding records:** Retained until the student reaches 25 years of age, or longer where required due to safeguarding concerns, statutory involvement, or legal proceedings.

Host Family Records

- **Initial enquiries:** Details from prospective host families who do not proceed with an application are deleted after 12 months
- **Non-active applicants:** If a host family applies but never hosts and is marked as non-active, their details are deleted after 12 months. Exceptions may apply if there is a valid reason to retain information (e.g., safeguarding concerns)
- **Active host families:** Records of host families who have hosted students are retained for the duration of the individual's role and for a period of 6 years thereafter, in line with safeguarding and legal requirements.
- **Financial details:** Bank information is deleted immediately once a host family becomes non-active.
- **DBS records:** DBS checks are conducted online via a secure service. Only the document number of cleared applicants is recorded. No paper copies are retained; any received are either returned or securely destroyed.
- **Unsuccessful applications:** Details of host family applications that do not proceed or are withdrawn are deleted after 12 months. If relevant to child protection, reasons for rejection may be retained.

Employment Records

- **Unsuccessful job applications:** Retained for six months after notification unless consent is given to keep CVs for future opportunities
- **Successful job applications:** Retained for the duration of the individual's role and for a period of 6 years thereafter, in line with safeguarding and legal requirements.
- **Employment contracts and amendments:** retained for the duration of the individual's role and for a period of 6 years thereafter, in line with safeguarding and legal requirements.
- **DBS checks and criminal record disclosures:** Only the document number is recorded; paper copies are not kept and are either returned or destroyed
- **Personnel and training records:** Retained throughout employment and indefinitely thereafter in accordance with child protection duties

Retention for Legal Purposes

In certain circumstances, we may retain personal data beyond the standard retention periods to safeguard our legal interests. For instance, if a legal claim may arise from services provided, relevant data will be stored securely and used solely for this purpose, in line with legal requirements.

Compliance with Other Legal Obligations

In addition to HMRC requirements, the Company remains subject to other statutory and regulatory frameworks, including but not limited to the **UK General Data Protection Regulation (UK GDPR), and safeguarding**. Accordingly, certain personal may be retained for alternative or extended periods where required by law or regulatory authority.

This policy should be read in conjunction with our Privacy Notice, available at:
https://www.britishguardianship.com/our-policies/privacy-notice