



AEGIS Privacy Notice

AEGIS takes your privacy extremely seriously; we are committed to protecting and respecting your privacy. This policy explains the what, how, and why of the information we collect from you, including when you visit our website. It also explains the specific ways we use and disclose any information.

Who are we?

AEGIS is the authoritative association for inspecting and accrediting UK guardianship organisations in accordance with a strict Code of Practice and current child care legislation. AEGIS is a registered charity (no. 1111384) and a Private Limited Company by guarantee (no. 03463173). The registered office address is The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire GL10 3RF.

AEGIS was set up to bring together schools/colleges and guardianship organisations to ensure and promote the welfare of international students, aged 18 or under, studying at UK schools/colleges. AEGIS provides a forum for best practice for schools/colleges and guardianship organisations through regular workshops and conferences. The welfare of international students is essential to UK schools/colleges and the provision of trustworthy, caring and efficient guardianship is paramount to the student's welfare.

How do we collect information from you?

We obtain information about you when you use our website, if you register to receive our newsletters, when you apply to become an AEGIS member, during the AEGIS accreditation/re-accreditation process, when you use our Disclosure & Barring counter signatory service, when you complete our Annual Declaration and if you apply to work for AEGIS.

What type of information is collected from you?

The personal information we collect might include your name, address, contact details, email address, IP address, information regarding which AEGIS webpages you have accessed and when, details about your company, number of students, country of origin of students, student age groups, work experience, references.

How is your information used by AEGIS?

AEGIS may use your information to:

- Carry out our obligations arising from any contracts entered into by you and us.
- Carry out the inspection and accreditation of your company if you are a guardianship organisation.
- Help us improve our services and target our audience more effectively.
- Send you details of forthcoming events and training which we feel would be of interest to you.

Why does AEGIS collect your information?

- To undertake the AEGIS membership, inspection, re-accreditation process.
- To undertake the counter signatory role of the DBS.
- To see and compare market trends in students, schools and guardianship organisations.

Who will your information be shared with?

- AEGIS will never share your information with any third party, without your prior consent.
- AEGIS may use a third party survey software companies such as SurveyMonkey to create and run professional online surveys. SurveyMonkey's privacy policy can be found here: <https://www.surveymonkey.com/mp/legal/privacy-policy/>
- AEGIS may use a third party marketing automation platform such as MailChimp to distribute information and share email campaigns and E-newsletters. AEGIS can gather statistics via MailChimp with regard to email opening and clicks using industry standard technologies, including clear gifs to help us monitor and improve our e-newsletter distribution. MailChimp's privacy notice can be found here: <https://mailchimp.com/legal/privacy/>
- AEGIS never sells lists or email addresses.

How will AEGIS's privacy information be provided:

- orally
- in writing
- electronically

General Data Protection Regulations 2018 (GDPR)

GDPR will replace current data privacy law, giving more rights to you as an individual and more obligations to organisations holding your personal data.

We have created this privacy notice, along with information about the increased rights you have in relation to the information we hold on you and the legal basis on which we are using it. This new privacy notice will be published on this website on 25 May 2018.

How we use your information

This privacy notice tells you what to expect when AEGIS collects personal information. It applies to information we collect about:

- visitors to our website
- complainants and other individuals in relation to a data protection or freedom of information complaint or enquiry
- people who use our services, e.g. who subscribe to our newsletter
- people who notify under the Data Protection Act
- job applicants and our current and former employees.



Visitors to our websites

When someone visits www.aegisuk.net, we use a third party website host called 'Names.co.uk'. This is where the website data is stored and how users' browsers can view the content. This website host will collect standard internet log information and details of visitor behaviour patterns. We do this to find out things such as the number of visitors to the various parts of the site. This information is only processed in a way which does not identify anyone.

Use of Cookies by AEGIS Website

Similar to other commercial websites, the AEGIS website uses a technology called "cookies" and web server logs to collect information about how our website is used. A cookie is a very small text document, which often includes an anonymous unique identifier. When you visit a website, that site asks your computer for permission to store this file in a part of your hard drive specifically designated for cookies.

Information gathered through cookies and web server logs may include the date and time of visits, the pages viewed, time spent at our website, and the websites visited just before and just after our website.

Cookies, in conjunction with our web server's log files, allow us to calculate the aggregate number of people visiting our website and which parts of the website are most popular. This helps us gather feedback so that we can improve our website and better serve our customers. Cookies do not allow us to gather any personal information about you.

We use 'session' cookies which enable you to carry information across pages of the website and avoid having to re-enter information. Session cookies enable us to compile statistics that help us to understand how the website is being used and to improve its structure.

We also use 'persistent' cookies which remain in the cookies file of your browser for longer and help us to recognise you as a unique visitor to the website, tailoring the content of certain areas of the website to offer you content that match your preferred interests.

You can refuse to accept cookies by activating the setting on your browser which allows you to refuse the setting of cookies. However, if you select this setting you may be unable to access certain parts of the website.

Links to other websites

This Privacy notice does not cover any links within the AEGIS website linking to other websites/organisations. We encourage you to read the privacy statements on the other websites you visit.



Search engine

Our website search is powered by Google translate. The Member Search is a custom search against the internal database. Google's privacy policies can be found here:

<https://policies.google.com/terms>

Security and performance

AEGIS does not use any third party service to help maintain the security and performance of our website, only the service that Names.co.uk offers with regards to hosting – see Email section below.

IP addresses of visitors are taken when people are on our website, as mentioned in the Cookies section above.

People who email us

AEGIS monitors any emails sent to us, including file attachments, for viruses or malicious software. Please be aware that you have a responsibility to ensure that any email you send is within the bounds of the law.

AEGIS uses an email server called 'Names.co.uk'. Transport Layer Security (TLS) is the protocol used by AegisUK's email system – a type of end-to-end encryption, which provides internet security over a computer network, which aims to privacy and data integrity between two communicating computer applications. AEGIS uses TLS to encrypt and protect email traffic in transit. Without the TLS, emails cannot be accessed by AEGIS. TLS is handled by the server and the software (for instance, Outlook). Webmail is the way to access AegisUK emails outside of Outlook or other email client/software. Only people with access details are permitted to access the AegisUK webmail system. The webmail is password protected, and this needs to be a specific strength to work.

People who contact us via social media

AEGIS has accounts on Twitter and Facebook.

Twitter's privacy notice can be found here: <https://twitter.com/en/privacy>

Facebook's privacy notice can be found here:

https://en-gb.facebook.com/work/legal/Workplace_Standard_Privacy/

People who call us

When you call AEGIS, we do not collect any Calling Line Identification (CLI) information.

Our telephone lines are with British Telecom, their privacy notice can be found at:

<http://www.productsandservices.bt.com/products/static/privacy-policy/>

People who make a complaint to us

When we receive a complaint from a person we make up a file containing the details of the complaint. This normally contains the identity of the complainant and any other individuals involved in the complaint.

We will only use the personal information we collect to process the complaint. From time to time, we may compile and publish statistics showing information such as the number of complaints we receive, but not in a form which identifies anyone.

We usually have to disclose the complainant's identity to whoever the complaint is about. This is inevitable where, for example, the accuracy of a person's record is in dispute. If a complainant does not want information identifying him or her to be disclosed, we will try to respect that. However, it may not be possible to handle a complaint on an anonymous basis.

We will keep personal information contained in complaint files for 2 years, from closure. It will be retained in a secure environment and access to it will be restricted according to the 'need to know' principle.

Similarly, where enquiries are submitted to us we will only use the information supplied to us to deal with the enquiry and any subsequent issues.

When a guardianship organisation member is removed from our list of members, for reasons of suspension, we do not identify the organisation to other members.

People who use the services of AEGIS

AEGIS offers various services to the public. We never use a third party to deal with any information requests. All requests are handled in-house. Any provided contact details are only used to provide the requested information, or other closely related purposes. For example, we might use such information about people who requested information about AEGIS in order to send them our newsletter to keep them informed about our recent work. However, when people receive our newsletter, they have an option to unsubscribe.

Job applicants, current and former AEGIS employees

AEGIS is the data controller for the information you provide during the process unless otherwise stated. AEGIS occasionally uses a third party Recruitment Agency to assist in collating applicants, such as SW1jobs – an agency that specialises in jobs in the South West. SW1jobs privacy policy is here: <https://www.sw1jobs.com/privacy>.

SW1 Jobs are part of the Newsquest Media Group Limited, who own the following local newspapers, in which AEGIS might place a job advertisement – Stroud News & Journal, Gloucestershire Gazette, and Wiltshire & Gloucestershire Standard. Newsquest Media Group Ltd's privacy policy is here: <http://www.newsquest.co.uk/privacy-policy>.

Such third party recruitment agencies would assist in our recruitment service.



What will we do with the information you provide to us?

All of the information you provide during the recruitment process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will not share any of the information you provide during the recruitment process with any third parties for marketing purposes or store any of your information outside of the European Economic Area. The information you provide will be held securely by us whether the information is in electronic or physical format.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

What information do we ask for, and why?

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary.

The information we ask for is used to assess your suitability for employment. You don't have to provide what we ask for but it might affect your application if you do not.

Application stage

AEGIS will ask for a covering letter and curriculum vitae. We may also ask that applicants complete an equal opportunities questionnaire (Equal Opportunities is not mandatory information – if you do not provide it, it will not affect your application). Equal Opportunity information will not be made available to any staff outside of the recruitment team in a way which can identify you. Any information you do provide will be used only to produce and monitor equal opportunities statistics. When recruiting it is important that our practices are non-discriminatory and fair to all by adhering to the principles underpinning equality of opportunity which are covered in the United Kingdom by the Equality Act 2010 (<https://www.gov.uk/guidance/equality-act-2010-guidance>).

In asking for applicants to provide us with a covering letter and curriculum vitae, we will be requesting personal details including name and contact details. We will also ask you about your previous work experience, education, referees and for answers to questions relevant to the role you have applied for. Staff involved in the recruitment process will have access to this information.

As an alternative to paper applications, AEGIS may use online recruitment application forms, if so, the above still applies.

Shortlisting

Staff involved in the recruitment process will create a shortlist of applicants to call for interview, based on the requirements of the post, in order to select the right candidate for the job.

Assessments

AEGIS might ask you to participate in tests, and/or to attend an interview – or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes. This information is held by AEGIS.

If you are unsuccessful following assessment for the position you have applied for, we may ask if you would like your details to be retained in our talent pool for a period of 1 year – a non-statutory recommended retention period. If you say yes, we would proactively contact you should any further suitable vacancies arise within this time period.

Conditional offer

If AEGIS makes a conditional offer of employment we may ask you for information so that we can carry out pre-employment checks. You must successfully complete pre-employment checks to progress to a final offer. We are required to confirm the identity of our staff, their right to work in the United Kingdom and seek assurance as to their trustworthiness, integrity and reliability.

You may therefore be required to provide:

- Proof of your identity and right to work in the UK– you will be asked to attend our office with original documents e.g. passport, we will take copies. Such copies will be kept for 6 years beyond the end of your period of work with AEGIS, in line with statutory recommended retention periods.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies. Such copies will be kept for 6 years beyond the end of your period of work with AEGIS.
- We will contact your referees, using the details you provide in your application, directly to obtain references.

Start date

If we make a final offer which is accepted, we will also ask you for the following:

- Bank details – to process salary payments.
- Emergency contact details – so we know who to contact in case you have an emergency at work.
- Details required enabling you to join our Pension scheme (where applicable).
- Once employment commences (where applicable), we will ask you to complete an application for a Basic Criminal Record check via the Disclosure and Barring Service.
- AEGIS's Code of Conduct requires all staff to declare if they have any potential conflicts of interest.



How long is the information retained for?

If you are successful, the information you provide during the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment. This includes your criminal records declaration, fitness to work, records of any security checks, references, and equal opportunities information. The 6-year time limit refers to the timeframe in which legal proceedings must be commenced as laid down under the Limitation Act 1980. Thus, where documents may be relevant to a contractual claim, it is recommended that these be retained for at least the corresponding 6-year limitation period.

If you are unsuccessful at any stage of the process, the information you have provided until that point, will be retained for 1 year (a recommended (non-statutory) retention period), from the closure of the campaign. This includes equal opportunities information, and any information generated throughout the assessment process, for example interview notes.

How we make decisions about recruitment?

Final recruitment decisions are made by the recruitment team and Board of Trustees. All of the information gathered during the application process is taken into account.

You are able to ask about decisions made about your application by emailing: info@aegisuk.net.

Your rights

Under the Data Protection Act 1998 and subsequent legislation (such as GDPR, 2018), you have rights as an individual which you can exercise in relation to the information we hold about you.

Complaints or queries

AEGIS tries to meet the highest standards when collecting and using personal information. For this reason, we take any complaints we receive about this very seriously. We encourage people to inform us if they think that our collection or use of information is unfair, misleading or inappropriate. We would also welcome any suggestions for improving our procedures.

If you would like to make a complaint about the way we have processed your personal information, you can contact us at info@aegisuk.net.

Access to personal information

AEGIS tries to be as open as it can be in terms of giving people access to their personal information. Individuals can find out if we hold any personal information by making a 'subject access request' under the Data Protection Act 1998 and subsequent legislation. If we do hold information about you we will:

- give you a description of it;
- tell you why we are holding it;
- tell you who it could be disclosed to; and
- let you have a copy of the information in an intelligible form.



If you agree, we will try to deal with your request informally, for example by providing you with the specific information you need over the telephone.

If we do hold information about you, you can ask us to correct any mistakes.

Disclosure of personal information

We will not disclose personal data without consent. However when we investigate a complaint, for example, we will need to share personal information with the organisation concerned and with other relevant bodies.

Changes to this privacy notice

We will keep our privacy notice under regular review. Our privacy notice will be next reviewed in 3 years or sooner if data protection legislation changes in the interim, therefore the review date will be May 2021.

How to contact us

To make a request to AEGIS for any personal information we may hold, or for a copy of our privacy notice, please write to:

AEGIS, The Wheelhouse, Bond's Mill Estate, Bristol Road, Stonehouse, Gloucestershire GL10 3RF.

Alternatively, you can email us on info@aegisuk.net.

Privacy Notice prepared by: Elaine Austin – Administration Assistant /Data Controller

Approved by Board of Trustees: 23rd May 2018

Notice became operational on: 23rd May 2018

Next review date: May 2019