

## Data Protection Policy – Organisation

<b>QA Area(s)</b>	• Information and Data Management • Governance and Management of Quality
<b>Applies to</b>	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input type="checkbox"/> Staff and learners
<b>Policy Owner</b>	Managing Director

### Purpose

The purpose of this policy is to establish ELI Schools' organizational commitment and approach to data protection compliance, ensuring that all processing of personal data complies with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

### Scope

This policy applies to:

- ELI Schools as an organization (data controller)
- All processing of personal data by ELI Schools
- All locations
- All personal data (students, staff, applicants, agents, host families, others)

### Policy Statement

#### Commitment to Data Protection:

ELI Schools is committed to protecting the privacy and personal data of all individuals whose data we process. We will:

- Comply fully with GDPR and Data Protection Act 2018
- Process personal data lawfully, fairly, and transparently
- Collect and use only necessary personal data
- Keep personal data secure
- Respect data subject rights
- Be accountable and demonstrate compliance

### DATA CONTROLLER

**ELI Schools is the data controller for personal data processed in connection with our education and training provision and related activities.**

#### Data Controller Details:

- **Organization:** LT Education Abroad Limited, trading as ELI Schools
- **Address:** 7 Herbert Place, Dublin 2, D02EH93
- **Data Protection Contact:** Peter Hutchinson, [peter@elischools.com](mailto:peter@elischools.com)

### Types Of Personal Data Processed

ELI Schools processes personal data relating to:

- Students:**
  - Contact and biographical details
  - Academic records
  - Financial records
  - Accommodation data
  - Support and welfare data (including special category data where disclosed: disabilities, medical conditions, safeguarding concerns)
  - Immigration data
  - Communications
  - Images (photographs, videos)
- Staff:**
  - Contact and biographical details
  - Employment records
  - Qualifications and Garda vetting
  - Performance and CPD records
  - Payroll data
  - Communications
  - (Special category data where disclosed: medical conditions, disciplinary records)
- Applicants (prospective students and staff):**
  - Application data
  - Communications
- Other Data Subjects:**
  - Agents, partners, host families, parents/guardians, suppliers, visitors: Contact details, communications, contractual data as necessary

## Purposes Of Processing

ELI Schools processes personal data for the following purposes:

- Providing Education and Training:**
  - Enrolling students
  - Delivering programmes
  - Assessing and recording student achievement
  - Issuing certificates
  - Providing academic and pastoral support
  - Managing attendance and progression
- Student Administration:**
  - Communicating with students
  - Arranging accommodation
  - Organizing activities and social programmes
  - Processing fees and financial administration
- Compliance with Legal Obligations:**
  - Immigration reporting (INIS/GNIB)
  - Tax compliance
  - Health and safety compliance
  - Safeguarding obligations (Children First Act)
  - Quality assurance (QQI)
- Quality Assurance and Improvement:**
  - Gathering feedback
  - Monitoring and evaluating provision
  - Accreditation and inspection
  - Research and analysis (anonymized where possible)
- Employment and HR:**
  - Recruiting staff
  - Administering employment
  - Payroll and benefits
  - Performance management and development

- Compliance with employment law
- Marketing and Communications:**
  - Promoting ELI Schools
  - Communicating with prospective students, agents, partners
  - (Only with consent where required)
- Security and Safety:**
  - Premises security (CCTV where used)
  - Safeguarding children and adults at risk
  - Health and safety
  - Incident management
- Legal Claims and Disputes:**
  - Establishing, exercising, or defending legal claims
  - Complaints and appeals

## Legal Bases for Processing

ELI Schools processes personal data under the following legal bases:

- For Students:**
  - **Contract:** Processing necessary for education contract (enrolment, teaching, assessment, support, issuing certificates)
  - **Legal Obligation:** Compliance with immigration law, tax law, safeguarding law, quality assurance requirements
  - **Legitimate Interests:** Quality assurance, security, legal claims (where not covered by contract or legal obligation)
  - **Consent:** Marketing (where consent obtained), photographs for promotional use, optional activities or data collection
- For Staff:**
  - **Contract:** Employment contract performance
  - **Legal Obligation:** Tax, PRSI, employment law compliance, Garda vetting (required for safeguarding)
  - **Legitimate Interests:** Quality assurance, security
  - **For Special Category Data:**
  - **Explicit Consent:** Disabilities, medical conditions disclosed for reasonable accommodations or extenuating circumstances
  - **Substantial Public Interest:** Safeguarding data (child protection legal obligation)
  - **Employment:** Staff medical data for sick leave, occupational health

## Data Protection Principles

ELI Schools processes all personal data in accordance with GDPR principles:

- Lawfulness, Fairness, Transparency:**
  - Legal basis for all processing
  - Fair processing

- Transparent: Privacy notices provided; individuals informed
- Purpose Limitation:**
  - Data collected for specified purposes
  - Not used for incompatible purposes
- Data Minimization:**
  - Only necessary data collected and processed
- Accuracy:**
  - Data kept accurate and up to date
  - Mechanisms for individuals to update or correct data
- Storage Limitation:**
  - Data retained only as long as necessary
  - Retention periods defined
  - Secure disposal when no longer needed
- Integrity and Confidentiality:**
  - Appropriate security measures (technical and organizational)
  - Protection against unauthorized access, loss, damage
- Accountability:**
  - ELI Schools demonstrates compliance
  - Documentation, policies, training, audits

## Data Subject Rights

### ELI Schools respects and facilitates data subject rights:

- **Right to be Informed:** Privacy notices provided
- **Right of Access:** Subject access requests handled (see Policy 10.3)
- **Right to Rectification:** Inaccurate data corrected
- **Right to Erasure:** Data erased where required (subject to legal retention obligations)
- **Right to Restrict Processing:** Restriction applied where appropriate
- **Right to Data Portability:** Provided where applicable
- **Right to Object:** Objections considered; processing stopped unless compelling legitimate grounds
- **Rights re Automated Decision-Making:** Not applicable (no automated decision-making at ELI Schools)

## Data Security

### ELI Schools implements appropriate security measures:

- Technical Measures:**
- Encryption (sensitive data)
  - Access controls (passwords, role-based access)
  - Firewalls, antivirus protection
  - Secure systems and backups
  - Secure disposal (shredding, secure deletion)
  - Incident response procedures
  - Contracts with data processors
  - Physical security (locked premises, restricted access)

### Data Breaches

#### In event of data breach:

- Breach contained and assessed
- Data Protection Commission notified within 72 hours (if breach poses risk to individuals)
- Affected individuals notified (if high risk)

## Data Retention and Disposal

Personal data retained only as long as necessary:

- **Student records:** 7 years after completion
- **Staff records:** 7 years after employment ends
- **Financial records:** 7 years (tax law requirement)
- **Safeguarding records:** Long-term retention per Children First guidance

- **Other records:** Specified retention periods (see Policy 10.3)

**After retention period: Secure disposal (shredding, secure deletion).**

### **THIRD PARTY PROCESSORS**

**When third parties process data on behalf of ELI Schools:**

- Due diligence conducted
- Data Processing Agreements in place
- Processors provide sufficient guarantees of security and compliance
- Monitoring of compliance

### **INTERNATIONAL DATA TRANSFERS**

**Personal data transferred outside EEA only where:**

- Recipient country has adequacy decision, OR
- Appropriate safeguards in place (Standard Contractual Clauses), OR
- Derogation applies (consent, contract, public interest)

**ELI Schools minimizes international transfers; where necessary, ensures compliance.**

### **PRIVACY NOTICES**

**ELI Schools provides clear privacy notices to all data subjects, informing them:**

- Who we are (data controller)
- What personal data we collect
- Why we collect it (purposes)
- Legal basis for processing
- Who we share data with
- How long we keep data
- Data subject rights
- How to contact us and how to complain to Data Protection Commission

<b>Version</b>	1.0
<b>Date Approved</b>	March 2026
<b>Approved by</b>	Board of Directors
<b>Next Review Date</b>	March 2027

**Related legislation, regulation or guidelines:**

- General Data Protection Regulation (GDPR) (EU) 2016/679
- Data Protection Act 2018 (Ireland)
- Children First Act 2015 (safeguarding data)
- Core Statutory Quality Assurance Guidelines 2016 (QQI)
- Code of Practice for Provision of Programmes of English Language Education to International Learners