

Pippa's Guardians Data Protection and Privacy Policy

Policy Overview

Pippa's Guardians is committed to protecting and respecting your privacy. We process personal information in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and all other applicable data protection legislation.

This Privacy Policy explains:

- what personal information we collect;
- why we collect it;
- how we use it;
- who we may share it with;
- how we protect it;
- your rights in relation to your personal information.

Pippa's Guardians Ltd is the Data Controller for the personal information described in this Privacy Policy.

We may update this policy from time to time. The latest version will always be available on our website.

For any questions regarding this policy or your personal information, please contact:

Data Protection Officer

Ben Hughes

Telephone: 01684 252757

Email: ben@pippasguardians.co.uk

How We Collect Personal Information

We collect personal information directly from:

- parents or legal guardians;
- students;
- educational consultants and agencies acting on behalf of parents;
- schools;
- prospective and existing host families.

Some information may also be collected during home visits, safeguarding checks and throughout the guardianship relationship.

The Personal Information we collect;

Student Information

This may include, but is not limited to:

- Full name
- Date of birth
- Home address
- School address
- Parent or guardian contact details
- Student contact details
- Medical information
- Dietary requirements
- Passport details and identification documents
- Photograph or passport photograph
- Photographs with family members where provided
- Emergency contact details
- Travel arrangements
- Welfare and safeguarding records
- Correspondence relating to guardianship

Host Family Information

This may include, but is not limited to:

- Full names of household members
- Dates of birth
- Occupations
- Home address
- Contact details
- Photographs of household members
- Photographs of the property
- References
- DBS information (where applicable)
- Home visit reports

- Safeguarding records
- Bank details where required for payment

Children's Information

As our services are primarily provided to children under the age of 18, we take particular care to ensure that their personal information is processed fairly, lawfully and securely.

Where appropriate, information is provided by parents or legal guardians, and we ensure that children's information is only used where necessary to provide our guardianship services and meet our safeguarding responsibilities.

Why We Process Personal Information

We process personal information for purposes including:

- providing guardianship services;
- arranging host family placements;
- communicating with parents, students and schools;
- safeguarding and student welfare;
- responding to emergencies;
- arranging travel and accommodation;
- maintaining financial records;
- complying with legal and regulatory obligations;
- maintaining appropriate insurance records;
- quality assurance and inspections;
- improving our services.

Our Lawful Basis for Processing

Under UK GDPR, we process personal information using one or more of the following lawful bases:

- Performance of a contract.
- Taking steps before entering into a contract.
- Compliance with legal obligations.
- Legitimate interests, where these are not overridden by an individual's rights and freedoms.
- Protection of vital interests in medical or safeguarding emergencies.
- Consent, where required.
- Where we process special category personal data, such as medical information, we do so only where an additional lawful condition under Article 9 UK GDPR applies, including:
 - protecting a student's vital interests;

- provision of safeguarding and welfare responsibilities;
- explicit consent where appropriate.

Sharing Personal Information

We treat all personal information as confidential.

We may share information where necessary with:

- parents or legal guardians;
- schools;
- prospective or current host families where appropriate;
- healthcare professionals;
- emergency services;
- local authorities;
- safeguarding agencies;
- social care services;
- insurers;
- legal advisers;
- accountants;
- IT service providers;
- cloud storage providers;
- our accrediting body, AEGIS, during inspections;
- regulatory authorities where required by law.

We only share the minimum information necessary for the relevant purpose.

We never sell personal information.

International Transfers

Some of our IT and cloud service providers may process personal information outside the United Kingdom.

Where this occurs, we ensure appropriate safeguards are in place, including adequacy regulations or approved international transfer mechanisms required under UK GDPR.

How We Store Personal Information

We take appropriate technical and organisational measures to protect personal information.

These include:

- secure premises;
- password-protected systems;
- multi-factor authentication;
- encrypted storage where appropriate;
- restricted staff access based on job role;
- secure cloud backup;
- anti-virus and malware protection;
- regular software updates;
- staff confidentiality obligations;
- staff training on data protection.

Although we take every reasonable precaution, transmission of information over the internet cannot be guaranteed to be completely secure.

Retention of Personal Information

Student records are normally retained throughout the guardianship relationship and for seven years after it ends. This enables us to meet our legal, safeguarding, contractual and insurance obligations.

Where a prospective student does not proceed with our services, their information will normally be deleted once it is no longer required.

Host family records are retained while the family remains registered and for seven years following the end of their relationship with Pippa's Guardians. Where a host family application is unsuccessful, personal information will normally be retained only for as long as necessary before being securely deleted.

Once retention periods have expired, personal information is securely deleted or destroyed.

Marketing

With appropriate consent where required, we may use photographs, testimonials or other information for promotional materials, our website or social media. You have the right to withdraw your consent or object to this processing at any time by contacting our Data Protection Officer.

Data Protection Officer

Ben Hughes

Telephone: 01684 252757

Email: ben@pippasguardians.co.uk

Alumni

If you choose to remain part of the Pippa's Guardians alumni community, we may retain limited contact details to send alumni news, events and other relevant communications. You may opt out of these communications or ask us to remove your details from our alumni database at any time.

The information we will retain is limited to:

- Names
- Email addresses
- School (s) attended
- Years with Pippa's Guardians

Your Rights

Under UK GDPR you have the following rights:

Right to be informed

- You have the right to understand how your personal information is collected and used.

Right of access

- You may request a copy of the personal information we hold about you.
- We may request proof of identity before responding.
- We will normally respond within one calendar month.

Right to rectification

- You may request correction of inaccurate or incomplete personal information.

Right to erasure

- You may request that your personal information is erased where the legal requirements are met.
- This right is not absolute and may not apply where we are required to retain information to comply with legal, safeguarding, contractual or regulatory obligations.

Right to restrict processing

- You may request that we temporarily restrict how your personal information is used in certain circumstances.

Right to data portability

- Where applicable, you may request your personal information in a structured, commonly used electronic format.

Right to object

- You have the right to object to certain types of processing, including direct marketing.

Rights relating to automated decision-making

- Pippa's Guardians does not make decisions about individuals solely by automated means. All significant decisions affecting students, parents, host families or staff involve meaningful human review.

Exercising Your Rights

To exercise any of your rights, please contact:

Ben Hughes
Data Protection Officer

Telephone: 01684 252757

Email: ben@pippasguardians.co.uk

Or write to:

Ben Hughes
Suite 4
Nimrod House
Sandy's Road
Malvern
Worcestershire
WR14 1JJ

There is normally no charge for making a request unless it is manifestly unfounded or excessive.

Personal Data Breaches

If a personal data breach occurs, Pippa's Guardians will investigate promptly and take appropriate action to minimise any risks.

Where required by law, breaches will be reported to the Information Commissioner's Office within the required timescales, and affected individuals will be informed where there is a high risk to their rights and freedoms.

Complaints

If you have concerns about how we handle your personal information, please contact our Data Protection Officer in the first instance.

If you remain dissatisfied, you have the right to lodge a complaint with the Information Commissioner's Office (ICO).

Telephone: 0303 123 1113

Website: www.ico.org.uk

If applicable, our ICO Registration Number is **Z3470594**

Website Cookies

Our website may use cookies to improve functionality and analyse website usage.

Policy Information	
Policy Version:	V11
Policy Date:	2 July 2026
Review Date:	2 July 2027
Policy Owner:	Imogen Trevethan
Policy Approved by:	Pippa's Guardians Senior Leadership Team