

Privacy and Cookie Policy

West London English School

Legal entity	West London School Ltd
Company number	09125881
Effective date	14 September 2026

This policy explains how West London School Ltd, trading as West London English School (WLES), collects, uses, shares and protects personal information. It also explains the choices and rights available to students, prospective students, parents, guardians, agents, visitors, website users, customers and job applicants.

Please read this policy together with any privacy information shown on a particular form or service. If a specific notice conflicts with this general policy, the specific notice will apply to that activity.

1. Who we are and how to contact us

West London School Ltd is the data controller responsible for deciding how and why personal information is used. The company trades as West London English School and is referred to in this policy as WLES, we, us or our.

Address: CP House, 97-107 Uxbridge Road, Ealing, London W5 5TL

Email: info@wles.net **Telephone:** +44 (0)20 3198 1888

Website: <https://wles.net/>

Questions, complaints and requests concerning personal information should be sent to the contact details above and marked for the attention of the Data Protection Lead.

2. Scope of this policy

This policy applies when a person:

- visits or uses wles.net, the WLES virtual learning environment or another WLES online service;
- makes an enquiry, requests a trial lesson or applies for a course;
- studies with WLES in person or online;
- books accommodation, transport, insurance, activities or another service through WLES;
- acts for a student as a parent, guardian, group leader, agent or emergency contact;
- attends a WLES event or appears in authorised photographs or recordings; or
- applies for employment or work with WLES.

Third-party websites and services have their own privacy policies. WLES is not responsible for the privacy practices of a third party merely because its website is linked from a WLES page.

3 Personal information we collect

The information collected depends on the relationship a person has with WLES and the services requested. It may include the following categories.

Identity information: Name, title, date of birth, age, nationality, country of origin, photograph, passport or identity-document details, signatures and student or booking reference numbers.

Contact information: Home and temporary addresses, email address, telephone number and communication preferences.

Course and academic information: Chosen course, dates, English level, placement-test answers and results, attendance, progress, assessment, teacher feedback and certificates.

Immigration and travel information: Visa or immigration status, passport and visa copies where required, arrival and departure information, travel arrangements and airport-transfer details.

Payment and transaction information: Fees, invoices, payment status, refunds and limited transaction information. Payment-card details are normally processed by the relevant payment provider rather than stored in full by WLES.

Accommodation information: Accommodation preferences, dietary needs, accessibility requirements, host or residence information and details needed to arrange or manage accommodation.

Welfare and safeguarding information: Emergency contacts, parental responsibility, permissions, independent-travel arrangements, missing-student records, incidents, welfare concerns and safeguarding records.

Health and accessibility information: Medical conditions, allergies, medication, disabilities, dietary needs and other information needed to provide appropriate support or respond to an emergency.

Communications: Emails, messages, forms, survey answers, complaints, feedback and records of telephone or in-person discussions where appropriate.

Images and recordings: Photographs, video, audio and testimonials where they are taken or supplied for an agreed purpose.

Website and technical information: IP address, browser and device information, user-agent string, pages requested, timestamps, security events, session information and cookie or preference information.

Recruitment information: Application form, CV, qualifications, employment history, references, right-to-work information, interview notes, suitability checks and, where required, DBS information.

4. Where personal information comes from

WLES normally receives personal information directly from the person concerned. It may also receive information from:

- a parent, guardian, sponsor, agent, school, employer or group leader;
- an accommodation provider, host, residence, transport provider or insurer;
- an examination body, awarding organisation, education provider or accreditation body;
- a referee, previous employer, recruitment agency or background-check provider;
- the Home Office, UK Visas and Immigration, police, local authority, healthcare professional or another public body where lawful and necessary;
- website, email, form, payment, communications and learning-platform providers; and
- publicly available sources where their use is fair, lawful and relevant.

If another person gives WLES someone else's information, that person should have authority to do so and should make this policy available to the individual where appropriate.

5. Why we use personal information and our lawful bases

WLES uses personal information only when it has a lawful basis. More than one basis may apply to an activity.

Activity	Purpose	Lawful basis
Enquiries, applications and trial lessons	Responding to enquiries; checking availability and suitability; preparing a quotation; taking steps requested before enrolment.	Steps before entering a contract; legitimate interests in responding and administering admissions.
Courses and student administration	Enrolling students; providing teaching, assessment, feedback, certificates, online access and student support; managing timetables and attendance.	Contract; legitimate interests in providing and improving education.
Payments and accounts	Taking payment; issuing invoices; processing refunds; maintaining accounting and audit records; preventing fraud.	Contract; legal obligation; legitimate interests in financial administration and fraud prevention.

Activity	Purpose	Lawful basis
Immigration, accreditation and compliance	Checking identity and immigration documents; maintaining attendance and course records; responding to lawful inspection or verification requests.	Legal obligation; legitimate interests in meeting accreditation requirements and protecting the integrity of our services.
Accommodation, travel, insurance and activities	Arranging and managing optional services requested by the student or organiser.	Contract; steps before entering a contract; legitimate interests in coordinating services.
Welfare and safeguarding	Protecting students; managing emergencies, incidents, missing-student procedures and under-18 arrangements.	Legal obligation; vital interests; legitimate interests in safeguarding students. Additional conditions apply to sensitive information.
Communications and service updates	Sending information about a booking, course, timetable, payment, welfare matter, policy or service change.	Contract; legal obligation; legitimate interests in effective administration.
Marketing	Sending relevant information about WLES courses, events and offers; measuring the effectiveness of permitted campaigns.	Consent where required; otherwise legitimate interests, subject to electronic-marketing rules and the right to object.
Photography, video and testimonials	Using authorised material for teaching, internal communications, publicity, the website, print and social media.	Consent where requested; in limited contexts, legitimate interests where use is expected, proportionate and does not override individual rights.
Website operation, security and analytics	Securing forms and sessions; diagnosing faults; preventing misuse; understanding aggregate website use and improving usability.	Legitimate interests; legal obligation where applicable; consent or a valid PECR exception for storage and access technologies.
Complaints and legal matters	Handling complaints; establishing facts; enforcing agreements; obtaining advice; bringing or defending legal claims.	Contract; legal obligation; legitimate interests in resolving disputes and protecting legal rights.
Recruitment	Assessing candidates; checking qualifications, suitability and right to work; taking recruitment decisions; meeting safer-recruitment duties.	Steps before entering a contract; legal obligation; legitimate interests in recruiting suitable staff and protecting students.

6 Special category and criminal offence information

Health information, certain disability information, information revealing racial or ethnic origin, religious or philosophical beliefs and some other sensitive information are special category data. WLES processes such information only when it has both an Article 6 lawful basis and an appropriate Article 9 condition.

Depending on the circumstances, the Article 9 condition may be explicit consent, vital interests where the person cannot consent, reasons of substantial public interest such as safeguarding, or the establishment, exercise or defence of legal claims. Where UK law requires an additional condition or an appropriate policy document, WLES will meet that requirement.

Criminal offence and DBS information is handled only where authorised by law and necessary for safeguarding, safer recruitment, employment or legal obligations. Access is restricted to people who need it for their role.

7. Information that must be provided

Some information is required to enter into or perform a contract, verify identity, meet safeguarding duties, comply with immigration or accreditation requirements, or provide a safe and suitable service. WLES will identify mandatory fields where practical. If required information is not provided, WLES may be unable to process an application, issue documents, arrange a service, admit a student or continue providing a course safely and lawfully.

8. Who we share personal information with

WLES does not sell personal information. It shares only the information reasonably necessary for the relevant purpose. Recipients may include:

- teachers, staff, contractors and authorised representatives who need the information for their work;
- parents, guardians, sponsors, agents and group leaders where authorised, necessary for the service or justified by safeguarding responsibilities;
- homestay, residence, transport, activity and insurance providers when those services are requested;
- payment processors, banks, accountants, auditors and fraud-prevention services;
- website hosting, secure storage, email, electronic-signature, form, learning-platform, IT support and communications providers;
- examination boards, awarding organisations and education partners;
- the British Council and other authorised accreditation or inspection bodies;
- the Home Office, UK Visas and Immigration, police, local authorities, emergency services, healthcare providers, courts and regulators where disclosure is required or permitted by law; and
- professional advisers, insurers, prospective purchasers or restructuring partners where necessary and subject to appropriate confidentiality and data-protection safeguards.

Service providers acting as processors must use personal information only on WLES's documented instructions, protect it appropriately and delete or return it when their services end, unless the law requires otherwise.

9. International transfers

WLES is based in the United Kingdom, but some students, agents and service providers are located overseas. Personal information may therefore be accessed from or transferred to countries outside the UK.

Where UK data-protection law restricts a transfer, WLES will use an approved safeguard, such as UK adequacy regulations, the UK International Data Transfer Agreement, the UK Addendum to approved contractual clauses, or another lawful exception. WLES will also consider the practical protections available in the destination country. Individuals may contact WLES for further information about safeguards relevant to their information.

10. How long we keep personal information

WLES keeps information only for as long as needed for the purpose for which it was collected, including contractual, safeguarding, accreditation, tax, accounting, insurance and legal requirements. The following periods are general standards; a record may be kept for longer where required by law, an active complaint, a safeguarding need, an investigation, a legal hold or the establishment, exercise or defence of legal claims.

Record category	General retention approach
General enquiries and trial-lesson requests	Normally up to 24 months after the last meaningful contact, unless the person enrolls or asks to receive marketing.
Incomplete or unsuccessful applications	Normally up to 24 months after the application closes, unless a longer period is needed to resolve a complaint or legal issue.
Student, course, attendance and contractual records	Normally six years after the course or contractual relationship ends, with shorter periods used where the record is no longer necessary.
Passport, visa and immigration evidence	Only for the period required for verification, accreditation, immigration compliance and related legal claims, then securely deleted or anonymised.
Financial and transaction records	Normally six years from the end of the financial year to which the record relates, or longer where legally required.
Routine welfare, medical and consent information	For the course and a proportionate period afterwards based on the student's age, the nature of the information and possible safeguarding or legal needs.
Formal child-protection and serious safeguarding records	In accordance with the WLES safeguarding retention schedule. Records may be retained until the child's 25th birthday or longer where the circumstances or law require.

Record category	General retention approach
Marketing records	Until consent is withdrawn or the person objects, and then only a minimal suppression record. Inactive contacts are reviewed periodically.
Photographs, videos and testimonials	For the stated campaign or purpose and subject to periodic review. Consent records may be kept for as long as the material is used and for an appropriate period afterwards.
Recruitment records for unsuccessful candidates	Normally six months after the recruitment decision, or up to 12 months where the candidate agrees to be considered for future roles.
Website security and diagnostic logs	Normally 14 to 30 days, unless an event must be investigated or retained as evidence.

When a retention period ends, WLES securely deletes, destroys or anonymises the information.

11. Marketing communications

WLES may send information about courses, services, events or offers where the recipient has consented or where another lawful route is available under the Privacy and Electronic Communications Regulations. WLES will not use safeguarding or medical information for marketing.

Every electronic marketing message will provide an appropriate way to unsubscribe. A person can also object or withdraw consent at any time by emailing info@wles.net. This will not affect service messages that are necessary for a current booking, course or legal obligation.

WLES applies particular care to marketing involving children. It will consider the child's age, understanding, best interests and the potential impact of the communication before using a child's information for direct marketing.

12. Photographs Video and Testimonials

WLES may take or receive photographs, videos, audio or testimonials during lessons, activities and events. Where consent is the basis for public promotional use, WLES will explain the intended channels and obtain an appropriate choice from the student and, where required, a parent or guardian. Refusing promotional consent will not affect access to the core course.

Consent can be changed for future use by contacting WLES. WLES will take reasonable steps to stop new use and remove material under its control, but it may not be possible to recall printed materials already distributed or copies independently shared by others.

13. Children and young people

WLES provides services to students under 18 and recognises that children merit particular protection.

WLES aims to explain important privacy information in clear, age-appropriate language and to make relevant information available to both the student and their parent or guardian.

A child's data-protection rights belong to the child. Whether a child can exercise a right or give valid consent independently depends on their age, maturity, understanding, the nature of the decision and applicable law. WLES will consider the child's wishes and best interests when responding to a parent, guardian or representative.

WLES may share information without consent where necessary to protect a child or another person, respond to a safeguarding concern, comply with law or work with police, local authorities, healthcare providers or other safeguarding bodies.

14. Website cookies and similar technologies

Cookies are small files or identifiers stored on or accessed from a user's device. Similar technologies include local storage, pixels, scripts and tags. WLES uses these technologies only for stated purposes and in accordance with the Privacy and Electronic Communications Regulations and UK data-protection law.

14.1 Strictly necessary technologies

These technologies support security, authentication, forms, requested services and privacy choices. They do not require consent where the legal exception applies, but WLES still provides clear information about them.

Name	Provider	Purpose	Duration	Category
csrftoken	WLES website application	Protects forms and users against cross-site request forgery attacks.	Up to one year	Strictly necessary
sessionid	WLES website application	Maintains an authenticated session or multi-step form progress.	Session or up to 14 days	Strictly necessary
Cookie preference record	WLES or its consent-management provider	Remembers the user's cookie choices so they do not have to be requested on every page.	Period shown in Cookie Settings	Strictly necessary

14.2 Analytics technologies

WLES may use privacy-limited analytics to understand aggregate website traffic, user journeys, performance and usability. The current names, providers and expiry periods of analytics technologies are displayed in the website's Cookie Settings panel and should be read together with this policy.

Where analytics does not meet a legal exception, it will be used only after consent. Where WLES relies on the statistical-purposes exception, the technology will be used solely to produce aggregate statistics for improving the website or service, individual-level information will not be retained longer than necessary for aggregation, and users will be given a simple and free way to object.

14.3 Embedded content social media and advertising

Pages may include content or links from services such as video or social-media platforms. These providers may set their own technologies when content is activated or when a user visits their service. WLES will use privacy controls where available and will seek consent before enabling non-exempt tracking. Advertising, cross-site tracking, profiling and social-media tracking technologies will not be activated without the consent required by law.

14.4 Managing choices

Users can accept, reject or manage non-essential technologies through the website's Cookie Settings control and can change their choice at any time. Rejecting non-essential technologies should not prevent access to the core website, although optional embedded features may not work until enabled. Browser controls can also delete or block cookies, but they may affect website functions.

15. Server logs and website security

WLES's web systems automatically create logs that may include IP addresses, browser user-agent strings, requested pages, timestamps, response information and security events. WLES uses these logs to operate and secure the service, diagnose faults, prevent abuse and investigate incidents. Security and diagnostic logs are normally rotated and deleted within 14 to 30 days unless a longer period is needed for an investigation or legal claim.

16. Security

WLES uses appropriate technical and organisational measures designed to protect personal information against accidental or unlawful loss, alteration, disclosure, access or destruction. Measures may include access controls, staff confidentiality, authentication, encryption where appropriate, backups, secure disposal, supplier checks, incident procedures and staff training.

No internet or storage system can be guaranteed to be completely secure. Anyone who believes that information connected with WLES has been compromised should contact WLES promptly.

17. Individual rights

Depending on the circumstances and lawful basis, an individual may have the right to:

- request access to personal information and supplementary information about its use;
- ask WLES to correct inaccurate or incomplete information;
- ask WLES to erase information in certain circumstances;
- ask WLES to restrict the use of information in certain circumstances;

- object to processing based on legitimate interests and object at any time to direct marketing;
- receive certain information in a structured, commonly used and machine-readable format and ask for it to be transferred where technically feasible;
- withdraw consent at any time where consent is the lawful basis, without affecting earlier lawful processing; and
- ask for safeguards concerning a solely automated decision that produces legal or similarly significant effects.

WLES does not currently make decisions about students or website users solely by automated means where the decision has legal or similarly significant effects.

To exercise a right, contact info@wles.net. WLES may request proportionate information to verify identity and authority. WLES normally responds within one month, although the law allows additional time for certain complex or numerous requests. Rights are not absolute, and WLES will explain any lawful reason for refusing or limiting a request. WLES does not normally charge a fee.

18. Complaints

Please contact WLES first if there is a concern about how personal information has been handled. WLES will investigate and respond in accordance with its data-protection complaint procedures.

An individual also has the right to complain to the Information Commissioner's Office, the UK supervisory authority:

Website: <https://ico.org.uk/make-a-complaint/> **Telephone:** 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

19. Changes to this policy

WLES reviews this policy regularly and may update it when its services, suppliers, legal obligations or processing activities change. The latest version will be published on the WLES website with its effective date. Where a change materially affects how personal information is used, WLES will take reasonable steps to bring it to the attention of affected individuals.

20. Contact summary

Data controller: West London School Ltd, trading as West London English School

Company number: 09125881

Address: CP House, 97-107 Uxbridge Road, Ealing, London W5 5TL

Email: info@wles.net **Telephone:** +44 (0)20 3198 1888