

OXBRIDGE GUARDIANS

DATA PROTECTION POLICY

This policy ensures that personal data is processed in accordance with regulations and that all staff are aware of their duties and responsibilities

Oxbridge Group Ltd, trading as Oxbridge Guardians and Aspired Education
Registered Company No. 08573744
Devas Club, 2a Stormont Road, Battersea, London SW11 5EN

Approvers: Helen Wu
Date Approved: 17/08/2018
Date Reviewed: 03/07/2020
Next Review: 03/07/2021

Related Documents:
Confidentiality and Information Sharing Policy

Oxbridge Guardians

Data Protection Policy

General Statement

The Managing Director has overall responsibility for ensuring that:

- Personal information relating to personal data about individuals, including current, past, prospective students, their parents, office staff and homestays is processed in accordance with Education Regulations and all other statutory provisions including the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018.
- All staff involved with the collection, processing and disclosure of personal data are aware of their duties and responsibilities.

Responsibility for Data Protection

In accordance with the GDPR and the Data Protection Act 2018, Oxbridge Guardians has notified the Information Commissioner’s Office of their company and processing activity. Oxbridge Group Limited’s Registration Number is: 08573744 and their registered address is: Devas Club, 2a Stormont Road, Battersea, London SW11 5EN

The Data Protection Officer is responsible for notification to the Data Protection Commissioner.

Enquiries

Any enquiry should be addressed in writing to the Managing Director, who is the Data Protection Officer.

Fair Obtaining and Processing

Oxbridge Guardians undertakes to process data fairly and for the following specified lawful purposes:

- to comply with statutory duties and obligations related to education and administration;
- to maintain/secure the student’s health, safety and welfare and to provide appropriate pastoral care;
- to provide parents, homestays and those with parental responsibility with information in relation to the student’s progress, achievements, attendance, attitude, aptitude and/or general demeanour within or in the vicinity of the school or homestay;
- in respect of administrative/financial matters;
- to enable the company to provide references.

Oxbridge Guardians will only process data consistent with the consent under which the data was originally collected.

The parent or guardian of each student will be asked to give consent to the processing of personal information by completing and signing a registration form which will be retained on the student file. Data includes, but is not limited to:

- name, date of birth, postal address, email and telephone number(s);
- next of kin;
- racial / ethnic origin;
- religious belief or other belief of a similar nature;
- physical or mental health or condition;
- special educational needs;
- the commission or alleged commission of any alleged disciplinary or criminal offence;
- reports / evaluations;
- exam results;
- attendance information;
- any relevant medical information;
- student disciplinary information;
- photographs (see below).

Oxbridge Guardians may also process a wide range of personal data about their staff, parents and homestays as part of their operation. The following are examples of the sort of data that may be involved:

- bank details and other financial information e.g. payments to homestays;
- Information about individual's health and contact details for their next of kin in case of an emergency;
- car details in the case of homestays providing this service to students;
- Oxbridge Guardians also receive personal data directly from individuals or in the case of students, from their parents. However, in some cases schools or other authorities associated with an individual may also provide data.

Parental consent will endure until destruction of the data as to which see below.

Sensitive Data

Occasionally, Oxbridge Guardians may need to process sensitive personal data regarding individuals. Such data includes information concerning an individual's physical or mental health, sexual activity, criminal records and proceedings, race or ethnic origin, political or religious beliefs. Sensitive personal data is entitled to special protection under GDPR and the Data Protection Act 2018, and will only be processed by Oxbridge Guardians with the explicit consent of the appropriate individual, or as otherwise permitted by GDPR and the Data Protection Act 2018.

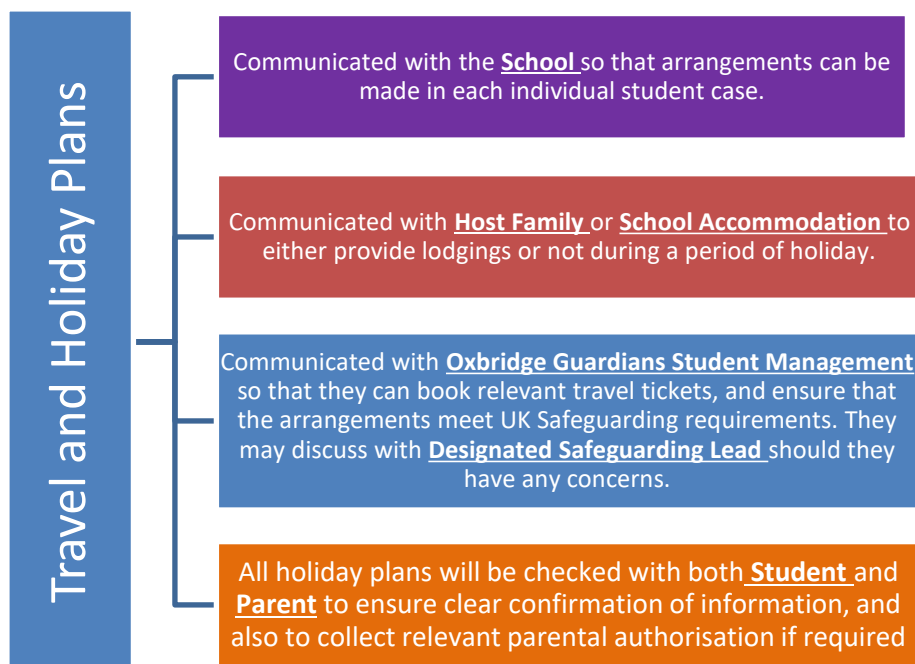
Practical Guide to Sharing of Information

Oxbridge Guardians are required to share certain information as part of our daily routines to provide the best possible standard of service to our students. These include, but are not limited to:

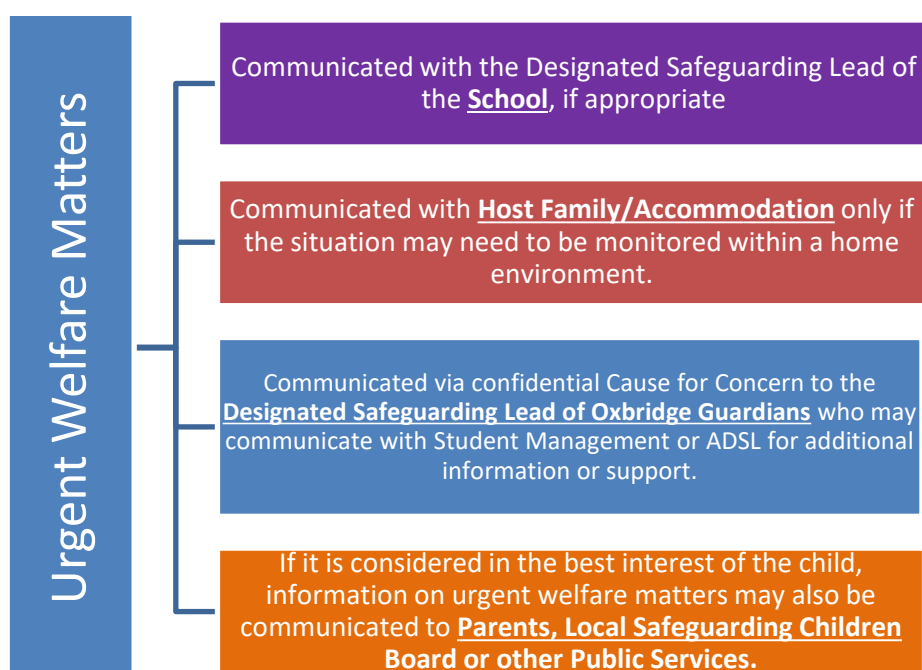
- Information on travel and half term/holiday plans
- Information on urgent welfare matters
- School Reports or other Academic concerns

To ensure clarity on our procedures we have noted below the processes that each of these cases would follow, along with staff or external people who may be consulted in each of these situations.

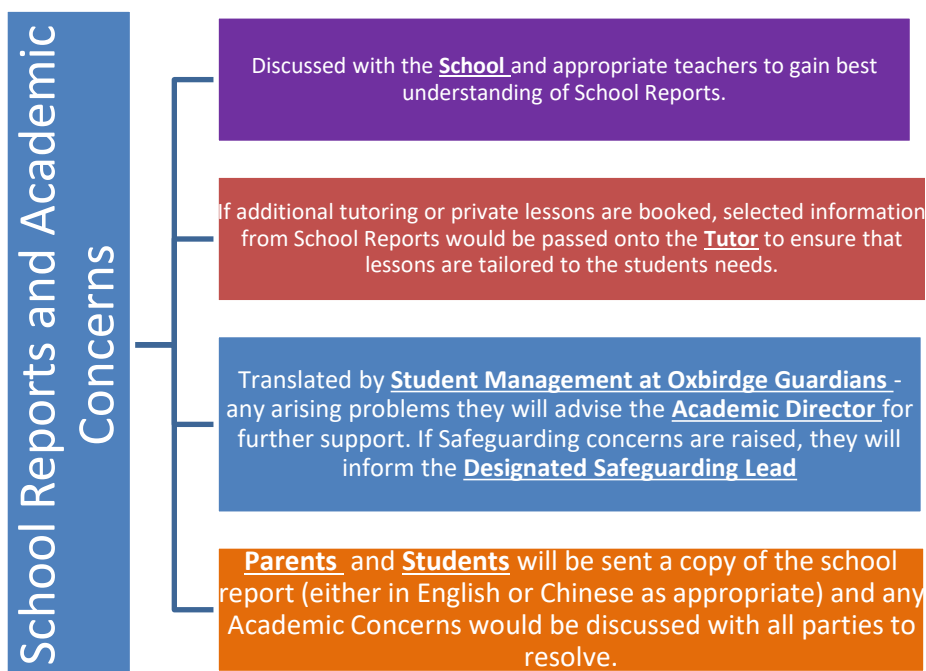
Information on travel and half term/holiday plans



Information on Urgent Welfare Matters



School Reports or other Academic Concerns



Data Accuracy

Data held will be accurate and kept up to date insofar as is reasonably possible. If a data subject informs Oxbridge Guardians of a change of circumstances, his or her computer and manual record will be updated as soon as is reasonably practicable.

Where a data subject challenges the accuracy of their data, Oxbridge Guardians will as soon as is reasonably practicable mark the record as potentially inaccurate, or 'challenged'. In the case of any dispute, the Data Protection Officer shall try to resolve the issue informally, but if this proves impossible, disputes will be dealt with through the organisation's Complaints Procedure for resolution. If the problem cannot be resolved at this stage, either side may seek independent arbitration via the Data Protection Information Commissioner.

Until resolved the 'challenged' marker will remain and all disclosures of the affected information will contain both versions of the information.

Data Adequacy and Relevance

Data held about individuals will be adequate, relevant and not excessive in relation to the purposes for which the data is being processed.

Length of Time

Save for contact details and references, data held about students will not be retained for longer than the student's 25th birthday, or later if required by Oxbridge Guardian's insurers and will then be destroyed in a confidential manner.

Save for information on a Record Card and that required by external authorities (e.g. HMRC), data held about staff and homestays will not be retained for longer than 4 years after they leave the Oxbridge Guardian's employ / service and will then be destroyed in a confidential manner. The information on the Record Card will consist of the subject's name, address, date of birth, telephone number and period of employment / service.

Data held about unsuccessful applicants for employment will be retained for no more than 12 months from the date of rejection.

Subject Access

Students, parents, homestays and staff have a right of access to their own personal data (except where otherwise specified pursuant to legislation).

Requests for access by students, parents, homestays or staff must be made in writing by completing a 'data subject access form' available from the Oxbridge Guardians office. Completed forms should be submitted to the Data Protection Officer.

Provided that there is sufficient information to process the request, an entry will be made in the Subject Access log book, showing the date of receipt, the data subject's name, the name and address of the person requesting the information (if different), the type of data required (eg Student Record, Personnel Record), and the planned date by when the information will be supplied. Should more information be required to establish either the identity of the data subject (or agent) or the type of data requested, the date of entry in the log will be the date on which sufficient information has been provided.

Requests for information will be dealt with within 40 calendar days from receipt of request and fee (except where legislation provides for disclosure within a shorter timescale).

Students may have access to their personal data if Oxbridge Guardians believes the student understands the nature of the request. It is considered that most children have a sufficient understanding by the age of 12.

Disclosure to Third Parties

Only authorised and trained staff are allowed to make external disclosures of personal data. External disclosure is envisaged in (but not limited to) the following circumstances:-

- to comply with statutory duties and obligations;
- to maintain / secure the student / staff / Homestays member's health, safety and welfare;
- to provide parents / those with parental responsibility with information about the student's progress, achievements, attendance, attitude, aptitude and general demeanour within or in the vicinity of their school / homestay;
- administrative / financial matters;
- the provision of references. Copies of references will not be provided to the person who is the subject of the reference. The subject's specific consent will be sought before any reference is given;
- in the best interests of Oxbridge Guardians or the student generally.

There may be unavoidable disclosures, for example to an engineer during maintenance of the computer system. In such circumstances the engineer will be required to sign a form promising not to disclose the data outside the school.

Data used within Oxbridge Guardians by administrative staff and management will only be made available to them where the person requesting the information is working within the company and

needs to know the information in order to undertake their work. All staff will be made aware of this policy and their duties under the Data Protection Act.

Use of Photographs

From time to time Oxbridge Guardians may wish to use photographs or images of students for the following purposes:

- on their website;
- for marketing or promotional publications.

Oxbridge Guardians will not publish photographs or images of individual students or name students when photographs are used [whether current or former students] without the express agreement of the appropriate individual or parental consent if under the age of 18. In any event Oxbridge Guardians will only use photographs of students in suitable dress.

Student Confidentiality

Students will be asked to respect each other's confidentiality. A student can request Oxbridge Guardians not to disclose his or her personal data to third parties including parents. Oxbridge Guardians will maintain such confidentiality unless it believes the student does not understand the consequences of withholding consent or, alternatively, it is not in the best interests of the student to withhold such consent. Any requests of this manner will be evaluated in line with the Safeguarding and Child Protection Policy alongside the Confidentiality and Information Sharing Policy by the Data Controller and Designated Safeguarding Lead.

Security

Oxbridge Guardians undertakes to use its best endeavours to ensure the security of personal data by adopting appropriate organisational and technical measures.

Physical Security

Appropriate building security measures are in place, such as alarms, window bars, deadlocks and computer hardware cable locks. Only authorised persons have access to disks, tapes and printouts which are locked away securely when not in use. Visitors to the office are required to sign in and out, and are, where appropriate, accompanied.

Systems Security

All files are stored on an encrypted central management system which has full detail of encryption and safety features here:

<https://help.podio.com/hc/en-us/articles/201018968-Podio-Security>

Whilst staff are working on files they may be stored on personal devices, but as soon as they're uploaded to the central system (within 24 hours where possible) these should be removed from the device.

Training

All staff will be trained about the need to maintain confidentiality and in relation to the legislative requirements.

Complaints

If an individual believes that Oxbridge Guardians has not complied with this Policy or acted in accordance with GDPR and the Data Protection Act 2018 they should utilise the company's complaints procedure.

If the individual is still not satisfied, they may make representations to the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel 01626 545700.

APPENDIX ONE

Oxbridge Guardians

Data Subject Access Form

Enquirer's Surname: _____

Enquirer's Forenames: _____

Enquirer's Address: _____

Enquirer's Postcode: _____

Email Address: _____

Home Phone Number: _____

Mobile Telephone Number: _____

Are you the person who is the subject of the records you are enquiring about? YES / NO
(i.e. the "Data Subject")?

If NO, please contact the Operations Director at the school to determine whether or not we need to have express written permission from the 'Data Subject' to divulge the requested information to you. N.B. this is generally necessary for all information, other than Educational Progress Reports requested by parents.

Do you have parental responsibility for a child who is the "Data Subject" of the records you are enquiring about? YES / NO

If NO, please state the nature of your relationship with the data subject. Please note that Oxbridge Guardians may require proof of identity before disclosing any data.

Name and Date of Birth of individual about whose personal data records you are enquiring

Name: _____ D.O.B: _____

Name: _____ D.O.B: _____

Description of information or topic(s) requested:

Please despatch reply to: (if different from enquirer's details as stated on this form)

Name: _____

Address: _____

Postcode: _____

Signature of data subject or subject's parent / guardian

Printed name of person signing

Date

APPENDIX TWO

Oxbridge Guardians

Data Subject Consent to Access Form

Data Subject's Surname: _____

Data Subject's Forenames: _____

Data Subject's Address: _____

Data Subject's Postcode: _____

Email Address: _____

Home Phone Number: _____

Mobile Number: _____

Enquirer's Surname: _____

Enquirer's Forenames: _____

Enquirer's Address: _____

Enquirer's Postcode: _____

Email Address: _____

Home Phone Number: _____

Mobile Telephone Number: _____

Description of information or topic(s) requested

Please despatch reply to: (if different from enquirer's details as stated on this form)

Name: _____

Address: _____

Postcode: _____

I understand that I am able in law to withhold this information from the Enquirer(s) and despite my right to withhold this data, I hereby consent to Oxbridge Guardians releasing the Subject Data to the Enquirer(s).

Signature of data subject: _____

Printed name of person signing: _____

Date signed: _____

