Data Protection Policy

Approvers:
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Related Documents:
Confidentiality and Information Sharing Policy
Privacy Policy Employee
Privacy Policy Staff
Handbook Parent
Handbook Student
Handbook Host Family
Handbook

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Oxbridge Group Ltd: Data Protection Policy

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Oxbridge Group Ltd: Data Protection Policy

General Statement

The UK Director, Steph Gilbert, is our Data Protection Officer. Steph 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 UK General Data Protection Regulation ("UK 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 UK GDPR and the Data Protection Act 2018, Oxbridge Group Ltd 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: 5 Pyghtle Way, Northampton, England, NN4 0QJ. The Office address is: Devas Club, 2a Stormont Road, Battersea, London SW11 5EN

Steph Gilbert is responsible for notification to the Data Protection Commissioner.

Enquiries

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

Fair Obtaining and Processing

Oxbridge Group Ltd 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 Group Ltd 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

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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 Group Ltd 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 Group Ltd 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 detailed below.

Sensitive Data

Occasionally, Oxbridge Group Ltd 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 UK GDPR and the Data Protection Act 2018, and will only be processed by Oxbridge Group Ltd with the explicit consent of the appropriate individual, or as otherwise permitted by UK GDPR and the Data Protection Act 2018.

Practical Guide to Sharing of Information

Oxbridge Group Ltd 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.

Oxbridge Group Ltd: Data Protection Policy

Student, Host & Staff Information – how it is stored & shared

Guardianship Agreement given to Agent (outside UK)

↓

Added onto encryped system (Podio) (Single Central Record)

↓

Relevant information shared with School/Host (Student Care Folder)

↓

Information Updated from UK to encrypted system (Podio)

Host Family or Staff Application (online) (UK)

↓

Added onto encryped system (Podio) (Single Central Record)

- Safer recruitment checks include work with Checks-Direct for enhanced DBS

↓

Relevant information shared with School/Student/Parent (Host Family Profile)

↓

Information Updated from UK to encrypted system (Podio)

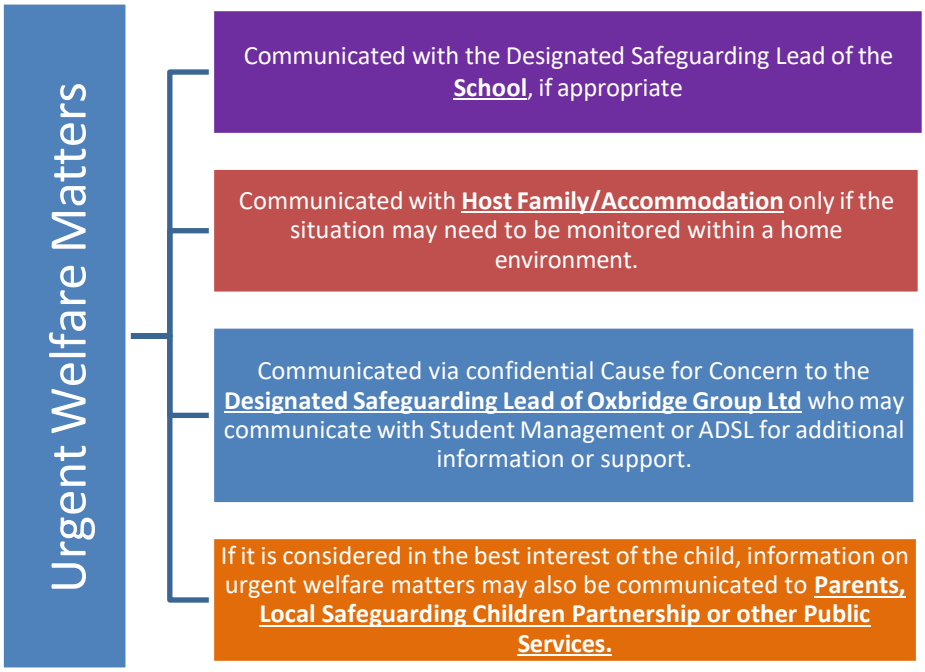
Information on travel and half term/holiday plans

Travel and Holiday Plans

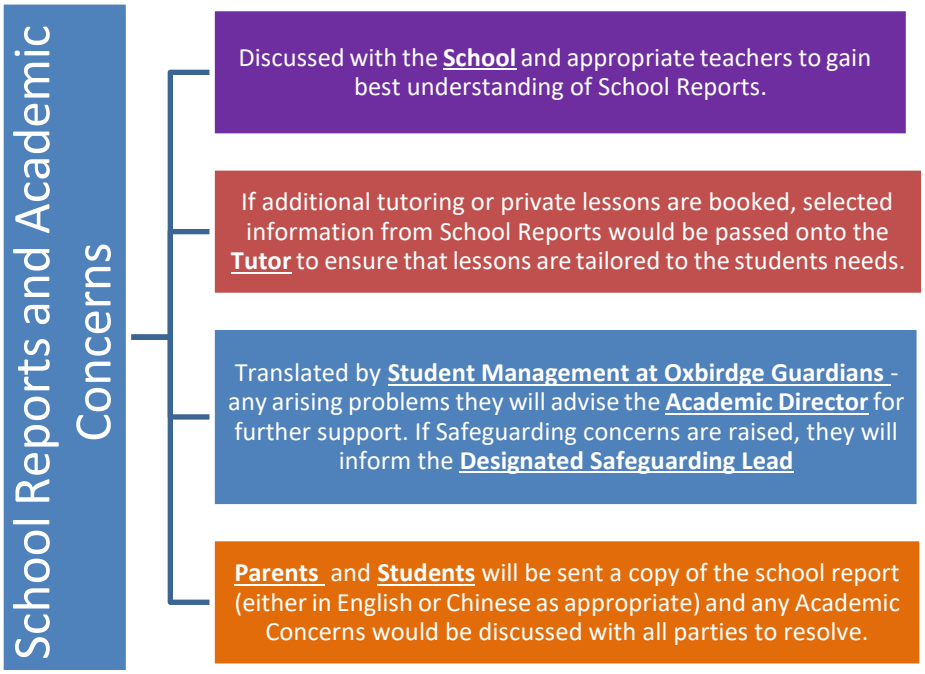
- Communicated with the **School** so that arrangements can be made in each individual student case.
- Communicated with **Host Family** or **School Accommodation** to either provide lodgings or not during a period of holiday.
- Communicated with Oxbridge Group Ltd **Student Management** so that they can book relevant travel tickets, and ensure that the arrangements meet UK Safeguarding requirements. They may discuss with **Designated Safeguarding Lead** should they have any concerns.
- All holiday plans will be checked with both **Student** and **Parent** to ensure clear confirmation of information, and also to collect relevant parental authorisation if required

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Information on Urgent Welfare Matters



School Reports or other Academic Concerns



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Data Accuracy

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

Where a data subject challenges the accuracy of their data, Oxbridge Group Ltd 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 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 Oxbridge Guardian's employ/service and will then be destroyed in a confidential manner.

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 Group Ltd 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 on Podio, 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 28 calendar days from receipt of request (except where legislation provides for disclosure within a shorter timescale).

Students may have access to their personal data if Oxbridge Group Ltd 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 Group Ltd 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 read and agree to our Data Protection and Confidentiality and Information Sharing Policy accordingly.

Data used within Oxbridge Group Ltd 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 Group Ltd may wish to use photographs or images of students for the following purposes:

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

Oxbridge Group Ltd 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 Group Ltd 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 Group Ltd not to disclose his or her personal data to third parties including parents. Oxbridge Group Ltd 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 Group Ltd 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 Group Ltd 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 1: Data Subject Access Request

Data Subject Access Form

Enquirer's Surname

Enquirer's First Name

Enquirer's Address

Enquirer's Post Code Email

Add another

Other umber

Other

Add another

Mobile Telephone Number

Other

Add another

Are you the person who is the subject of the records you are enquiring about (ie: the Data Subject)

If 'No' please contact the Director of Oxbridge Group Ltd to determine whether or not we need to see express written permission from the 'Data Subject' to divulge the requested information.

Do you have parental responsibility for a child who is the ' Data Subject' of the records which you are enquiring about?

If 'No' Please state your relationship with the 'Data Subject' and note that Oxbridge Group Ltd may ask for verification of your identity before disclosing any data.

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Name of 'Data Subject'

Date of Birth of 'Data Subject' Start

End

Description of information or topics requested

Contact information of where information should be sent to (if different to those already given)

Signature of Enquirer

Supported image types: .jpg .gif .png

Add another

Data Subject Informed of request? Data Subject should be made aware that they are able in law to withhold information from the enquirer,.

For internal use only

Consent given by Data Subject for Enquirer to access requested information For

Internal Use only

Evidence of Data Subject's knowledge Supported

image types: .jpg .gif .png

Add another

Signature of Data Subject Supported

image types: .jpg .gif .png

Add another

Attachment s

Add another

Submit

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