

## **Oxford Prospects Programmes**

# **Data Protection Policy**

Oxford Prospects Programmes (OPP) needs to collect data from students, employees and contractors in order to carry out its business. We will ensure that data is collected, stored and retained in accordance with the Data Protection Act 1998 and the GDPR 2018.

## Data collection and purposes

- 1. OPP asks prospective students, employees, tutors and helpers to provide personal data in the course of recruitment and, in some cases, after recruitment.
- 2. The personal data that we collect from students includes:
  - personal details
  - educational details
  - dietary requirements and medical/disability information if offered.
- 2(b). We need this student data in order to:
  - process applications including visa applications
  - provide suitable accommodation, learning activities and catering
  - maintain academic integrity and prevent or detect academic fraud
  - Keep students safe and well during any study abroad

With student consent in order to comply with the GDPR, we will also use student details to keep in touch with our alumni

- 2(c). We may ask students for information about their ethnic background and religion as part of the course evaluation process. This information is collected anonymously, cannot be traced to individual students, and is used only in aggregated form to monitor the implementation of our Equality, Discrimination and Disability Policy.
- 3. The personal data that we collect from employees includes:
  - personal details
  - information provided during the application process, e.g. educational and employment history
  - disability information if offered
  - after a candidate has been selected: date of birth, financial and tax information, evidence of right to work in the UK and, on occasion, unspent convictions

- 4. In addition to the above, OPP may generate personal data that will be held in an employee's personnel file. This may include:
  - Forms and reports relating to appraisal
  - Information relating to disciplinary action
    - 4(b). We need this employee data in order to:
      - o process job applications
      - o administer employment-related activities
- 5. The personal data that we collect from tutors and helpers includes:
  - personal data
  - disability information if offered
  - where applicable, evidence of right to work in the UK
  - financial details (at the end of a contract)
- 6. In addition, OPP may generate personal data on its helpers and tutors as part of its performance review process.
- 6(b). We need this contractor data in order to:
  - Process applications including interviews
  - Administer contract-related activities
  - Monitor and uphold teaching standards

## Storage, access, retention and destruction

- Personal data may be held in hard copy and/or electronic format. It will be stored securely in a locked filing cabinet or in password-protected file on the company SharePoint.
- 8. Personal data will be accessed only by people who need it for their work. It may not be copied, nor shared informally either within or outside of OPP.
- 9. Personal data may be retained only as long as is necessary for the purposes for which it was collected. In particular:
  - Passport information must be deleted/destroyed once students have returned home
  - Information relating to disabilities must be deleted/destroyed once the relevant professional relationship comes to an end
  - CVs of unsuccessful applicants may be retained only with their consent
  - Contractors' bank details must be deleted/destroyed once payment has been made
  - Employment-related information such as a 'right to work', national insurance numbers and bank details must be deleted/destroyed at the end of the relevant period of employment
  - Employers must relinquish access to any data they have at the end of their employment
- 10. Data may exceptionally be retained beyond the normal period if necessary for legal or other reasonable purposes. For example:
  - Contractors' bank details may be retained if they are printed on an invoice that we must keep for tax purposes
  - Data relating to former employees may be retained if they are in an ongoing dispute with OPP.

11. Deletion and destruction of data must take place with due regard to security, e.g. documents should be shredded before disposal and computer data should be overwritten before being deleted.

#### Data transfer

- 12. Where data is to be transferred outside of the EEA:
  - The consent of the data subject should be sought
  - Data may be transferred only to the extent necessary for continuing our activities
  - OPP will put contracts in place with overseas partners to ensure that data is processed to a similar standard of data protection as required by UK legislation

#### Administration

- 13. OPP is registered as a data controller under the name Oxford World Ltd, no. ZA127038.
- 14. OPP's Data Protection Officer is the Deputy Operations Manager