



## DATA RETENTION POLICY

<b>POLICY INTENDED FOR:</b>	Staff, Students & Parents
<b>CATEGORY:</b>	Data Protection
<b>PUBLISHED:</b>	Server, Policy Folders at College and Students Accommodations, Staff Handbook
<b>POLICY IMPLEMENTED BY:</b>	Principal
<b>POLICY MONITORED BY:</b>	Operations Manager
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<b>REVIEWED DATE:</b>	August 2021
<b>CONSULTATION WITH:</b>	Senior Leadership Team (SLT)
<b>RECORD OF CHANGES &amp; ADDITIONS:</b>	Jan 2020: Compliance Officer replacing Chief Privacy Officer & CW replacing MTH in this post April 2021: Removal of OIEG from Third Party Compliance listing
<b>NEXT REVIEW:</b>	August 2022

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## INTRODUCTION

This policy outlines the lawful way Oxford International College (OIC) store personal information and the duration for which it is retained. This policy has been written in line with the General Data Protection Regulations (GDPR) which came into effect as of 25 May 2018.

## WHAT IS PERSONAL INFORMATION?

Personal information is information that the College collects which is specific to an individual. This includes, but is not limited to, name, date of birth, address, language and nationality. We hold academic information, including information from previous institutions such as relevant examination results for all students. Other personal information held by the College includes, but is not limited to, relevant medical information, behavioural & attendance records and special educational considerations. Personal information also includes any photographs or video footage of individuals. The College holds personal information on previous, prospective and current students as well as previous, prospective and current staff members.

## THE LAWFUL BASIS ON WHICH WE COLLECT, HOLD AND USE THIS INFORMATION

Areas where your personal data will be collected include, but are not limited to:

- Admissions Forms
- Pre-Arrival Forms
- Visa forms and documentation
- Referral information; schools, universities, safeguarding and medical
- College internal forms
- CCTV video capture within College premises
- Access security key card system
- School Photography and Videography
- Recruitment information
- Financial information
- Medical Information

We use the information collected in a lawful manner to conduct the normal running of the school. We store information securely and share appropriately. This information is used solely for the purpose of safe and efficient running of the College and its promotion. Some examples of how your data might be used or shared are:

- Collection of CCTV footage to keep premises, personnel and property safe. This is safely secured and only accessible by relevant administrators
- Collection and sharing of personal data for government compliance
- Use of medical and other personal information to ensure satisfactory pastoral and employee care can be given.
- Sharing of academic results with further education institutions and sharing of personal data with examining bodies.
- Sharing of academic and behavioural information with parents and guardians as appropriate.
- Photographs and videos may be used on College website, social media sites and within prospectus materials.

### HOW WE STORE PERSONAL DATA

The majority of staff and student personal data held by the College is stored within our Management Information System (MIS). Our MIS is designed for use in academic institutions and is itself beholden to current Data Protection regulations in legislation within the UK and Europe. We store a limited amount of additional personal data on our secure server and on secure hard drives on College property, for example for the CCTV footage, or on with relevant third-party systems, for example UCAS and Sage Accounting. All data is protected by encryption and is accessible only to relevant members of staff within the College and third-party supplier organisations.

As it pertains to students, the College store personal data for the duration of a student's education with OIC and for a reasonable period thereafter. Certain data which is no longer relevant after a period of time, for example medical information, will be deleted appropriately from our records. Basic personal data such as name, date of birth, academic results and country of origin will be retained for College records indefinitely, along with any data we are obligated to retain for legislative reasons.

As it pertains to staff, the College store personal data for the duration of employment with OIC and for a reasonable period thereafter. Certain data which is no longer relevant after a period of time, for example medical information, will be deleted appropriately from our records. Basic personal data such as name, date of birth, employment period, title and salary will be retained for College records indefinitely, along with any data we are obligated to retain for legislative reasons.

### STAFF SPECIFIC DATA RETENTION POLICY

Staff data is collected and stored in line with the GDPR and is accessible, as applicable, to:

- Human Resources
- Senior Leadership
- IT/Operations administration
- Bursars

Personal data, as pertains to both permanent and non-permanent OIC staff and tutors, is retained for the duration of employment after which:

- General employment information, i.e. employment dates, job title(s) and salary, will be retained indefinitely
- Basic contact information will be retained for a period of 2 years after termination of employment by either party, after which time contact will be made by the College to ensure data is still correct.
- Relevant financial information, such as bank details and NI insurance details, will be retained for a period of 12 months after the year end following termination of employment by either party
- Staff conduct information, i.e. disciplinary and absence records, will be held for a period indefinitely after termination of employment by either party.
- Personal information as pertains to legislative requirements i.e. professional accreditations, safeguarding and DBS checks, will be retained indefinitely.

Personal data, as pertains to prospective or casual OIC staff, is retained, by consent, until the end of the following academic year only in cases where it may be reasonably expected that their services may be required during this time. Personal data, as pertains to prospective OIC staff who did not meet criteria for employment or for which there is no reasonable expectation for a suitable role to be available within the coming academic year, will be retained for no longer than 3 months following application or interview as relevant.

**Note:** Any data pertaining to the safeguarding of OIC students will be retained indefinitely in accordance with safeguarding regulations which supersede those of the GDPR.

### STUDENT SPECIFIC PERSONAL DATA RETENTION POLICY

Student data is collected and stored in line with the GDPR and is accessible, as applicable, to:

- Senior Leadership
- IT/Operations administration
- Bursars
- Academic Tutors
- Academic Administration
- Pastoral Care

We routinely share pupil information with:

- schools/universities that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE)
- UCAS
- Examining Bodies
- NHS general practitioners' office
- The National Pupil Database (NPD)

Personal data, as pertains to prospective students and their parent, is retained for the duration of consideration after which

Personal data, as pertains to current students and their parents is retained for the duration of the student's education with OIC after which:

- General personal information, i.e. name, date of birth and country of origin, will be retained indefinitely.
- Academic attainment information i.e. As and A level examination results, will be retained indefinitely
- Financial information, i.e. payment information, will be retained for a period of 12 months after the year end following graduation of the student.
- Medical information, i.e. details of relevant medical conditions and any medical interventions required during educational term at OIC, will be retained for a period of 2 years following graduation of student as standard. In some instances, the college may be required by law to retain this information beyond this time, or indefinitely dependant on the nature of the information held by the college.

- Pastoral Information, i.e. safeguarding information, will be retained indefinitely to meet safeguarding legislation.
- Disciplinary and Conduct information, i.e. sanctions and rewards, will be retained for the duration of the student's onward study upon leaving the college, i.e. for the duration of their undergraduate degree or equivalent.

All other personal data held on a student or parent will be held for a period of 1 year after leaving OIC. As relevant, requests may be made by the College for parental and/or student consent to retain certain information for a longer period.

***Please note:** the above does not apply to any data we are obligated to retain for legislative purposes. Such data will be retained in line with the legislative guidelines and as advised by OIC legal counsel and brokers.*

#### OTHER PERSONAL DATA RETENTION POLICY

CCTV footage is continuously recorded at a number of points throughout the College grounds. This footage is stored for a duration of no longer than 4 weeks unless required as evidence in any legal or disciplinary proceedings. Footage is encrypted and stored securely onsite. It is routinely accessed by only relevant IT/Operations administration. In instances of legal or disciplinary proceedings this footage will be made available, as appropriate, to senior and pastoral care management at the College and to local authorities.

Security at Wavy Gate boarding house is managed by an encrypted fob system. Each fob is encrypted against the room number only. Information on individual room allocation is held separately from the fob system to ensure no personal identification may be made from the fob alone in instances where these are lost or stolen. Fobs are wiped of all data at the time of returning these to the college and may then be reassigned for incoming students thereafter. Data regarding the use of the fob throughout the duration of students boarding is retained on the secure server for a period of no longer 3 months following student graduation.

Photography and Videography undertaken by the College is held on secure College Drive and is used, by individual parental or personal consent, for College promotional activity. In instances where parental or personal consent has not been given for the use of such photography or videography will be held solely on College drives and will not be used within a promotional capacity. In instances where consent for photography and videography has been given the College will retain and use these resources within

marketing and promotional activity indefinitely. Any student or parent has the right to withdraw consent at any time and at such there will be no further use of this material.

### THIRD PARTY GDPR COMPLIANCE INFORMATION

The College, in accordance with standard educational and employer operations use a number of third party systems and suppliers with whom personal data may be shared or upon which personal data may be stored.

AQA Examination Board	National Health Service (NHS)	Sage Accounting
Arubic	National Pupil Database (NPD)	Smart Survey
CIFE Examination Board	Network Computer	Twitter
Department for Education (DfE)	OCR Examination Board	UCAS
e-Teach	Office 365	WJEC (inclusive of Eduqas)
Extra Digital	Oxfordshire County Council	Taylor Partnership
Facebook	Pearson Group (inclusive of Edexcel)	TLJ Security Systems
HM Revenue and Customs (HMRC)	Plug and Play	

### REQUESTING ACCESS TO YOUR PERSONAL INFORMATION

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold.

To make a request for your personal information, or be given access to your child's educational record contact OIC Compliance Officer on [protectingdata@oxcoll.com](mailto:protectingdata@oxcoll.com).

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### FURTHER INFORMATION

For further information about Data Retention at OIC please speak with OIC Compliance Officer, Claire Wellstood.

[protectingdata@oxcoll.com](mailto:protectingdata@oxcoll.com)

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