

Policy on Data Protection

Introduction

Capital School is fully committed to comply with the requirements of the General Data Protection Regulation (GDPR). We recognise the importance of correct and lawful treatment of personal data as it helps to maintain confidence in our organisation and to ensure efficient and successful outcomes when using this data. We will always try to be clear about what data we store, why we need it, how we store it and how long we store data for. To this end, we have created this policy and have a designated Data Protection Officer (DPO), whose role is to ensure the policy is maintained and to advise on data protection issues. This policy applies to staff and students at the school.

The current DPO is Rachel. E-mail address is rachel@capitalschoolofenglish.co.uk

Student Data

In order for a student to study with us, we ask for personal details and relevant documentation. The type of data that we ask for may differ, depending on the nature of the course that you book.

What data we store

Personal data that we need includes your full name, passport details, your gender, date of birth, visa details, address, e-mail address, phone number, emergency contact details, medical conditions that may be relevant, languages spoken and previous experience of studying English.

Obtaining Consent

We always aim to gain your consent in writing, informing you of the reason we need this data. Usually this is done on the booking form and the student contract by ticking a box and signing a declaration. We rarely ask for verbal permission to share data, in which case we make a record of the verbal agreement.

Why we need this data

We use this personal data for various reasons but chiefly to

- Support an application to study
- To verify and standardise information (e.g. name spelling)
- Issue visa letters
- Ensure your own safety and well-being
- Determine whether special arrangements must be made

Sharing your Data

If a student is applying to study through an agent, we will send the offer letter to the agent, who will therefore be able to see your personal information. We may also share personal information about you with a sponsor, a parent or somebody responsible for payment of your course. We may also share your data with another external organisation, such as university or potential employer, if you require an academic report or letter of reference.

If you are staying with a homestay provider, we will share relevant information with the homestay provider. We have a duty of care to share relevant information, including medical information, about you with relevant people such as your homestay provider or teacher. If we believe that there is need to share any information about medical conditions more widely, we will ask for your permission first.

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How we store data

As a student, you will have a unique paper and electronic file. Your personal data is stored on the school's own filing systems – electronic and paper - which can only be accessed at the school, by authorised staff only. Paper files are kept in a lockable filing cabinet kept in an area that is always staffed during opening hours. Electronic documents with personal data – chiefly in word and spreadsheet format - are kept in password protected electronic folders. Passwords change periodically and are known by only the relevant members of staff. When paper files are no longer required on a regular basis, they are transferred to the archived filing area, which is also locked.

How long do we store data for?

We retain data records for students that enrol and study with us for a period of 5 years from the start of the course. We keep these records for future audits and for inspection purposes. If a student applies for a course but does not start their course, we destroy all data we have on that student 21 days after the due start date. This GDPR Erasure removes all personal data stored on paper and electronically.

Protecting Your Data

Our staff are trained to work with data of a personal nature. We have a dedicated Data Protection Officer who is responsible for ensuring that other staff are aware of their responsibilities and our staff procedures have been developed to reflect the need for security.

Verifying Identity

We may need to verify your identity to ensure we are sharing information with the right person. In order to do this, we will ask you to identify yourself using your full name, date of birth and a third means connected, where possible, to you and the school.

If somebody were requesting data on your behalf, a progress report to be sent, for example, we will need you to make the request and to confirm the identity of the person who will receive the information.

Staff Data

The school is required to hold certain data about you, including

- Your full name
- Passport details
- NI number
- Contact details
- Emergency contact details
- Relevant health conditions
- Relevant qualifications, training undertaken, previous work experience

We also hold banking details for staff. Banking details are kept only as long as it takes to set up their online payment system. Once these have been saved on the bank's own system, electronic files are immediately destroyed and paper documents are shredded.

We will obtain your consent before following up references or carrying out a DBS check.

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Deleting Personal Information

All staff and students at the school have the right to request and see the information we hold on them.

If you wish to view this data, the request should be made in writing to the DPO. We will

- take steps to verify your identity
- acknowledge your request within 48 hours
- make arrangements to fulfil the request within one month of receiving the request

If you have a reasonable request for the data to be deleted, we will arrange for all your data to be destroyed. This GDPR erasure includes

- shredding paper documents
- deleting data from spreadsheets
- deleting data from word documents
- deleting emails containing personal information

If you wish to see your data being destroyed, you should put this in writing and we will discuss how this can be achieved.

Use of Images

The school takes photos and uses videos of the school, its students and staff for marketing purposes. This includes using images on Instagram, Facebook, Twitter, the school's website, posters and notices around the school and our brochure. Staff and students at the school are asked to provide a signed written agreement for their image to be used by the school. If you do not at any time want your image to be taken or shared with others please let us know. We will aim to seek verbal agreement just before photos and videos are taken. We will only ever use your first name and we will not tag you in social media posts.

For under 18 students, we will ask for written permission from your parent or guardian.

Reviewed November 2019