



Document: **Privacy Policy**

Date Reviewed: November 2021

1. Introduction

This privacy policy is to inform you about how we use your personal data. It is important that you read this privacy notice together with other policies and forms that may be provided on specific occasions when we are collecting or processing personal data about you (*employee, contractor, volunteer, student, agent, Homestay provider, UK guardian and parents*), so that you are fully aware of how and why we are using your data.

You can find a table with the type of data we process, the purpose of processing and the lawful bases for processing these data in the Appendix specific for *Employee, contractor, volunteer, student, agent, Homestay provider, UK guarding and parent*.

When you contact Oxford ILS we may collect personal information about you. We have written this statement to give you the following details:

- What personal information we collect about you
- How we use your information
- Who we may share your information with
- What choices you have about what we can do with your information
- How to access your information.

2. About us

Oxford International Language School, Oxford ILS
The Old Music Hall
106-108 Cowley Road
Oxford
OX4 1JE
United Kingdom
Tel: +44 (0)1865 403351
Email: info@oxford-school.co.uk
Web: www.oxford-school.co.uk

In the UK, OXFORD ILS is operated by Inspire Executive Solutions Limited, a company registered in England and Wales, registration number 05509496, and whose registered address is 1 Isis Close, Oxford OX1 4XX, United Kingdom

We can be contacted in writing at our address on Cowley Road, Oxford, or on email at info@oxford-school.co.uk. Our Data Manager is someone who can be contacted at the same address or email at info@oxford-school.co.uk.

Our EU Data Representative can be contacted by email at: eudata@oxford-school.co.uk.

We last updated this Privacy Statement in November 2021.

2. Information collection

We may collect the following information about you:

- Your name and address
- Your contact details including email address and telephone number
- The organisation which employs you and your role within that organisation
- Your payment details
- Notes in relation to our contact with you or your next of kin.

We collect information about you in two different categories:

- Identifiable information: this is information that allows us to identify you such as name and email address, telephone number etc.
- Anonymous information: we may collect information that does not personally identify you but categorises you into a group or sector (e.g. age, marital status, lifestyle) and we can use this information to tailor our products and services more accurately

Personal Information you give us:

We may collect personal information about you when you:

- Use our website
- Fill in our “Contact us” enquiry form on our website
- Contact us via email or by telephone for any reason
- When you register for a course or service we offer
- When you complete the Pre-arrival online test
- When you work for us as a member of staff, as an agent, or commercial partner.

Personal Information we collect automatically:

When you visit our website or use our services, we may collect certain information automatically such as:

- IP addresses (the name your computer uses to identify itself to us)
- How you found our website
- Dates and times that you visited our website
- Which pages you visited
- What products and services interest you

We use cookies for statistical purposes to track users we have and how often they visit our websites. We collect information listing which of our pages are most frequently visited, and by which types of users and from which countries.

Personal Information we collect from other organisations:

Possibly other partner companies or educational agents.

3. Usage of information

How we use your Personal Information

Any personal information that you give to us is used to provide updates about our products/services or to fulfil any contract that we may have entered into with you. In order to do this we may use your information in the following ways:

- To provide you with the information, products and services for which you have asked us
- To fulfil any contracts into which you have entered with us
- To process your payment for our products and services
- To help us monitor and improve the services we offer
- To comply with our legal obligations or as otherwise required by law or regulation
- To prevent and detect fraud
- To assess your English level.

Depending on what contact information you have given to us, we may contact you by email, post or text message. We will only do this where you have consented to receiving such information from us.

You can opt out of such communications at any time and if you wish to do so, please email us at: info@oxford-school.co.uk

4. Legal Requirements and Law Enforcement

We may also disclose your personal information to third parties if we are required to do so by law, or in order to enforce or apply our terms of use. This includes exchanging information with other organisations for the purposes of fraud protection and credit risk reduction and also law enforcement agencies. For more information please see Appendix VI. *When do we share personal data?*

5. Third Party Privacy Policies

Our site may contain links to websites owned by other organisations. If you follow a link to another website, these websites will have their own privacy policy. We suggest that you check the policies of any other websites before giving them your personal information as we cannot accept responsibility for any other website.

6. Keeping your Personal Information - Where we store your personal information

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. By submitting your personal data, you agree to this transfer, storing or processing. When transferring information to others, within the EEA or otherwise, we ensure that appropriate and suitable safeguards and technical measures are in place to protect your personal data.

7. Retention of information

We only hold your personal information for as long as necessary for the purposes for which we collected your information. We have set these timescales in accordance with any applicable legislation and where none exists then we will keep your information for the duration of any contract that you have entered into with us and then for a period of 2 years after which time it will be deleted. Personal information of employees, contractors, volunteers of Oxford ILS are held for a period of 8 years from the contract end date and subsequently deleted.

8. Your rights

8.1 Right to object

You have the right to object to certain types of processing such as direct marketing. Right to object to automated processing, including profiling.

8.2 Right to change, restrict or delete your information

You can ask us at any time to change, amend or delete the information that we hold about you or ask us not to contact you with any further marketing information. You can also ask us to restrict the information that we process about you.

You can use the check boxes on the forms we use to collect your information or you can also request that we change, amend, delete your information or restrict our processing by emailing us at info@oxford-school.co.uk or writing to us at the address at the beginning of this Privacy Policy.

8.3 Right to access your information

You have the right to access information that we hold about you. If you wish to receive a copy of the information that we hold please contact us at info@oxford-school.co.uk or write to us at the address above.

8.4 Right to transfer your personal Information

You have the right to request that your personal data is transferred by us to another organisation (this is called “data portability”). Please contact us at info@oxford-school.co.uk with the details of what you would like us to do and we will try our best to comply with your request. It may not be technically feasible, but we will work with you to try and find a solution.

Please note: *Some of these rights may not apply where we are legally obliged to keep or share your personal data.*

9. Complaints

If you make a request to us under this Privacy Policy and you are unhappy with the response, you can ask for the request to be reviewed under our internal complaints procedure. Our Complaints Policy is published on our website. Our internal complaints procedure allows your request to be reviewed by our Data manager, who will do their best to try and resolve the issue.

If you have been through the internal complaints procedure and are still not happy with the result, then you have the right to complain to the Information Commissioner’s Office. They can be contacted as follows:

Website: www.ico.org.uk

Telephone: 03031231113

9. Changes to our Privacy Policy

We review our Privacy Policy on a frequent basis to check that it accurately reflects how we deal with your information and may amend it if necessary. You should check this page regularly to see the most up to date information.

Appendix

I. Employee, contractor, volunteer

The purposes and lawful bases of the data that we hold if you are an employee or volunteer of Oxford ILS

Data we process	Purpose of processing this data	Lawful base for processing this data
Name, date of birth, gender, email address, phone number, passport number	To administer our relationship with you	Fulfilment of our contract with you
Next of kin and emergency contact numbers	In the event of an emergency	To protect your vital interests
Bank account details, payroll records, National Insurance number, tax status information, salary, annual leave, pension & benefits information, marital status	To process salary payments To provide tax and related data to HMRC	Fulfilment of our contract with you Compliance with a legal obligation
Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process	To administer the business To facilitate safe recruitment, as part of our safeguarding obligations towards pupils	Compliance with a legal obligation Necessary for our legitimate interests (recruitment)
Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships	To administer our business	Necessary for our legitimate interests (to manage the workforce)
Performance information; outcomes of any disciplinary and/or grievance procedures; absence data	To administer our business	Fulfilment of our contract with you Necessary for our legitimate interests (to support effective performance management)
Copy of driving licence	To ensure legal, insured use of vehicles	Compliance with a legal obligation
Images, videos	For maintaining security For marketing our services	Compliance with a legal obligation Where you have given us consent
CCTV footage	For security management	Compliance with a legal obligation
Data about your use of the organisation's information and communications systems, including Internet use	To meet our safeguarding obligations To administer and protect the business	Compliance with a legal obligation Necessary for our legitimate interests (to secure our buildings)
Criminal record information	To meet our safeguarding obligations	Compliance with a legal obligation
Medical and disability information	To meet the requirements of our accrediting bodies, welfare purposes	Necessary for our legitimate interests (to meet the requirements of accrediting bodies)

II. Student

The purposes and lawful bases of the data that we hold if you are a student of Oxford ILS

Data we process	Purpose of processing this data	Lawful base for processing this data
Name, date of birth, gender, email address, phone number	To identify you and communicate with you	Fulfilment of our contract with you Compliance with legal obligation
Your nationality, any special educational needs, special requirements or disabilities	To provide appropriate information and assistance for you	Fulfilment of our contract with you Compliance with a legal obligation
Next of kin and emergency contact numbers	In the event of an emergency	To protect your vital interests
Your passport or ID number, residence permit, status permit, and visa details	To meet government immigration regulations	Compliance with a legal obligation
Bank account details	To manage payments and refunds	Fulfilment of our contract with you Compliance with a legal obligation
Your educational records and test or exam results from previous schools	To offer you the most appropriate course	Fulfilment of our contract with you
Your medical information, including medications you take, allergies and dietary requirements	To help you manage your health while you are with us, for welfare purpose	Fulfilment of our contract with you Compliance with a legal obligation
Your educational records and test or exam results from Oxford ILS	To manage your progress while studying with us	Fulfilment of our contract with you
Your attendance records and booking in/out records for school and residence	To meet immigration and safeguarding regulations	Compliance with a legal obligation
Details of your welfare such as how you are getting on at Oxford ILS, safeguarding or child protection records and any problems or issues you may have had	To look after your wellbeing and meet government safeguarding regulations	Fulfilment of our contract with you Compliance with a legal obligation
Details of any behaviour issues or exclusions	To manage discipline in the school	Necessary for our legitimate interests (to manage school discipline)
Images, videos	For maintaining security For marketing our services	Compliance with a legal obligation Where you have given us consent
CCTV footage	For security management	Compliance with a legal obligation
Data about your use of the organisation's information and communications systems, including Internet use	To meet our safeguarding obligations To administer and protect the business	Compliance with a legal obligation Necessary for our legitimate interests (to secure our buildings)

III. Agent

The purposes and lawful bases of the data that we hold if you are an agent for Oxford ILS

Data we process	Purpose of processing this data	Lawful base for processing this data
Name, address, email address, phone number, company registration and status	To communicate with you about students you have sent to Oxford ILS; to ensure you have up-to-date information so you can provide accurate information to potential students	Fulfilment of our contract with you
Bank account details	To process commission payments	Fulfilment of our contract with you
Joining information, references	To register your agency with Oxford ILS	Necessary for our legitimate shared interests
Details of students you have sent to us	To administer our business, to manage agreed recruitment targets	Fulfilment of our contract with you
Images, videos	For marketing our services	Where you have given us consent
CCTV footage	For security management if you have visited the school	Compliance with a legal obligation
Financial details, bank account information, commission agreements, payment records	To administer our business, to make commission payments	Fulfilment of our contract with you

IV. Homestay provider (HP)

The purposes and lawful bases off the data that we hold if you are a homestay provider for Oxford ILS

Data we process	Purpose of processing this data	Lawful base for processing this data
Name, date of birth, gender, nationality, religion, address, email address, phone number, passport number	To administer our relationship with you To provide key information to homestay students	Fulfilment of our contract with you Compliance with a legal obligation for Private Fostering Providers
Details of those living in your household, including: Name, date of birth, occupation, gender, nationality and religion	To administer our relationship with you To provide key information to homestay students	Fulfilment of our contract with you Necessary for our legitimate interests (to meet the requirements of accrediting bodies) Compliance with a legal obligation for Private Fostering Providers
Information about your hobbies and interests, pets and household routines	To provide key information to homestay students	Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
Information about your house including the number of rooms, facilities and furnishings	To provide key information to homestay students To meet the requirements of our accrediting bodies	Fulfilment of our contract with you Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
Bank account details and payment records	To process payments	Fulfilment of our contract with you Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
Recruitment information, including copies of right to work documentation, references and other information included in the host application form and application process	To administer the business To facilitate safe recruitment, as part of our safeguarding obligations	Compliance with a legal obligation Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
Compliance information, including: Gas Safety Certificate copies, Fire Safety risk assessments, annual and initial visit records and training records	To administer our business To meet the requirements of our accrediting bodies	Fulfilment of our contract with you Necessary for our legitimate interests (to meet the requirements of accrediting bodies) Compliance with a legal obligation for Private Fostering Providers
Copy of driving licence Copy of passport or ID	To ensure legal, insured use of vehicle To confirm identity	Compliance with a legal obligation Compliance with a legal obligation
Images, videos	For marketing our services	Where you have given us consent
CCTV footage	For security management if you have visited the school	Compliance with a legal obligation
Criminal record information	To meet our safeguarding obligations	Compliance with a legal obligation
Medical and disability information	To meet the requirements of our accrediting bodies, for welfare purposes	Necessary for our legitimate interests (to meet the requirements of accrediting bodies) Compliance with a legal obligation for Private Fostering Providers

V. UK Guardian and Parent/s (for students under the age of 18)

The purposes and lawful bases of the data that we hold if you are a UK Guardian for Oxford ILS

Data we process	Purpose of processing this data	Lawful base for processing this data
Name, nationality, address, email addresses, phone numbers and relationship to the student you are caring for	To communicate with you about students you are looking after at Oxford ILS	Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
Passport or ID number	To confirm identity or right to remain in UK	Compliance with a legal obligation
Notes and records relating to the student you are caring for	To administer our business	Necessary for our legitimate shared interests Necessary for our legitimate interests (to meet the requirements of accrediting bodies)
CCTV footage	For security management if you have visited the school	Compliance with a legal obligation

VI. When do we share personal data?

When it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

	Employee, Volunteer	Student	Agent	HP	UK Guardian, Parent/s
Central and local government, our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns	yes	yes	yes	yes	yes
Your family or representatives	yes	yes	N/A	N/A	N/A
Educators and examining bodies	yes	yes	N/A	N/A	N/A
Our regulators (e.g. British Council, English UK, UKVI, or UK immigration bodies and embassies)	yes	yes	yes	yes	yes
Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll and surveys	yes	yes	yes	yes	yes
Financial organisations incl. payment processing	yes	yes	yes	yes	yes
Our auditors	yes	yes	yes	yes	yes
Trade unions and associations	yes	N/A	N/A	N/A	N/A
Security organisations	yes	yes	N/A	N/A	N/A
Health and social welfare organisations	yes	yes	yes	yes	yes
Professional advisers and consultants	yes	yes	yes	yes	yes
Charities and voluntary organisations	yes	yes	N/A	N/A	N/A
Police forces, courts, tribunals	yes	yes	yes	yes	yes
Professional bodies	yes	yes	yes	yes	yes
Employment and recruitment agencies	yes	N/A	N/A	N/A	N/A
Fee payers (sponsors)	N/A	yes	yes	N/A	N/A
A trusted educational agent in your country – to help you during the application process	N/A	yes	N/A	N/A	N/A
Our students	yes	N/A	N/A	yes	N/A
<i>We may also use your personal information where:</i>					
- You have given us permission to use it in a certain way	yes	yes	yes	yes	yes
- We need to protect your interests (or someone else's interest)	yes	yes	yes	yes	yes