

# Oxford Japanese School

Registered Charity No. 1184474



## Data Protection Policy

Last updated	11 <sup>th</sup> August 2020
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### Definitions

<b>School</b>	means Oxford Japanese School, a registered charity.
<b>GDPR</b>	means the General Data Protection Regulation.
<b>Responsible Person</b>	Means the Data Protection Officer.
<b>Register of Systems</b>	means a register of all systems or contexts in which personal data is processed by the School.

### 1. Data protection principles

The School is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed **lawfully, fairly** and in a **transparent** manner in relation to individuals;
- b. collected for **specified, explicit and legitimate purposes** and **not further processed** in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. **adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed;
- d. **accurate** and, where necessary, **kept up to date**; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. **kept in a form which permits identification of data subjects for no longer than is necessary** for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for

archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and

- f. processed in a manner that **ensures appropriate security of the personal data**, including **protection against unauthorised or unlawful processing** and **against accidental loss, destruction or damage**, using appropriate technical or organisational measures.”

## 2. General provisions

- a. This policy applies to all personal data processed by the School.
- b. The Responsible Person shall take responsibility for the School’s ongoing compliance with this policy.
- c. This policy shall be **reviewed at least annually**.
- d. The School is exempt from paying a registration fee to the Information Commissioner’s Office.

## 3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

## 4. Lawful purposes

- a. All data processed by the School must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The School shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the School’s systems.

## 5. Data minimisation

- a. The School shall ensure that personal data are **adequate, relevant and limited to what is necessary** in relation to the purposes for which they are processed.

## 6. Accuracy

- a. The School shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. **At start of each academic year, the School shall contact the parents/guardians to ensure the accuracy of data held for each pupil.**

## 7. Archiving / removal

To ensure that personal data is kept for no longer than necessary, the School shall:-

1. Retain the personal data contained in its financial records for no longer than six years;

- and
2. Remove all non-financial pupil-related records after one year of leaving the School, except for statistical purposes, whereby only the initials and attendance records of the pupil is kept in the archive section of the School's drive.

## **8. Security**

- a. The School shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

## **9. Breach**

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the School shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY