

## OPDS Policy on General Data Protection Regulation (GDPR)

### Awareness

The contents of this paper will be discussed during training with all members of OPDS staff and they will be invited to raise any issues.

The issue will be raised regularly to maintain awareness and any concerns raised by OPDS members of staff will be incorporated into this paper, where appropriate.

### OPDS Data Protection Officer

- The OPDS Data Protection Officer is Larry Field
- He can be contacted on 020 3475 9388 or [larry\\_field@opds.co.uk](mailto:larry_field@opds.co.uk)
- OPDS is registered with the Information Commissioner's Office with reference ZA132328

### Information held by OPDS

Information we receive and hold in order to run the business efficiently comes from a variety of sources.

Initially, we receive information about students via a set of documents (see Appendix A), which has been submitted to us from their parents. This information is used to create a Student Record, containing their personal data. Permission to hold and process this data is sought when an initial agreement is made with OPDS to provide service.

**Services we offer include School Placement, Student Guardianship and Online Tutoring**  
School Placement may contain student information pertaining to their success or failure to gain a place in a school of their choice, with reasons, where they have been provided by the school. Such reasons may include results of school tests, aptitude tests or interviews.

As part of the Guardianship service, OPDS makes frequent bank transfers to students who request funds to be used as pocket money. These are made from a client account, into which funds have been paid by the parents. In order to make these transfers swiftly, bank account information is held on our on-line banking system.

During exeat and school holidays, students may stay with a host family. Information is held as to where they stay and how they get to and from the school. Feedback forms are periodically requested from students and the host family, inviting comments on their stay.

### Communicating private information

OPDS staff are aware that private information about a student or their family may not be revealed to a third party, without the express permission, in writing, from the person(s) involved.

The only exceptions to this are where, legally, OPDS is requested by statutory bodies, such as the Police or Local Council, to provide such information. Even in these circumstances, OPDS insists that such requests are given in writing. To facilitate such requests, e-mail is accepted as a form of writing, although OPDS is aware that the precise source of that e-mail must be credible.

London office: 40c Waddington Avenue,  
Old Coulsdon, Surrey CR5 1QF, United Kingdom

+44 (0)20 8660 8869 [info@opds.co.uk](mailto:info@opds.co.uk)

[WWW.OPDS.CO.UK](http://WWW.OPDS.CO.UK)

Registered Office: 308 High Street, Croydon, Surrey, CR0 1NG. Registered in England & Wales No. 4480329. VAT Number: 194 9972 35

China office: 28G Tower C, Oriental Kenzo Plaza, No. 48 Dong Zhimen  
Wai Street, Dong Cheng District, Beijing, China 100027

+86 (0)10 8454 9302/3 [info@opds.co.cn](mailto:info@opds.co.cn)

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## Individual's rights

Individuals have a right to see the information we hold for them at any time although they are requested to make a written appointment, with proof of identity, to ensure the appropriate staff are available to demonstrate this to them.

Once OPDS no longer provides services to a student, host family or tutor, all information pertaining to that person is passed from the 'live' file to the 'archive' file. Once archived, the information is not available to anyone. We keep these files archived for 6 months after which they are then deleted from our system entirely. During this period, archived files may be recovered and brought back into the 'live' file.

## Subject Access Requests

OPDS undertakes to allow access to the appropriate individuals at the earliest practical opportunity and within the statutory 30 day period.

We may extend this time period up to three months if the request is complex, or if the same individual has made a high number of requests. In this case, we will inform the individual that we need more time within 30 days of the request.

OPDS will maintain a log of all such requests, including when made and when implemented, with comments on each case from both parties.

## Lawful Basis for processing personal data

OPDS has identified three categories under which processing may take place:

- Consent: the individual has given clear consent for O.P.D.S. to process their personal data for a specific purpose.
- Legal obligation: the processing is necessary for O.P.D.S. to comply with the law (not including contractual obligations).
- Vital interests: the processing is necessary to protect someone's life.

## Children

OPDS requests the current passport of all students and accepts this as a bona fide document containing wholly accurate information. No further checks are carried out by OPDS on the data contained therein.

OPDS is aware when a passport expires and will update the record with new passport information as it becomes available.

## Data Breaches

OPDS is aware that data breaches may have to be reported to the ICO and/or the individual concerned, depending on the nature of the breach.

Where inaccurate data has been processed, either because of initial inaccuracy at the time of receipt or through the inherent inaccuracy of human intervention, this will be reported to the Data Protection Officer, who will decide on the severity of the case and report as appropriate.

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A log will be maintained by OPDS of all such incidents, with a decision recorded as to the action taken and whether the matter was escalated or not.

### Data Protection Officers

Larry Field, a Director of OPDS, is the nominated DPO for the company and accepts the responsibilities as specified by GDPR.

However, all staff are aware of their individual responsibilities and the reporting lines they must follow if they have any concerns.

### International Issues

OPDS deals with overseas companies, primarily in China, although periodically we have requests to assist families from other countries.

Each family we work with is advised of our GDPR compliance policy via the website, giving OPDS approval to process their personal data as it is supplied to OPDS.

Created

May 2018

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## Appendix A

### Documents requested by OPDS from families

- Passport
- BRP
- Resume
- School Transcripts
- Personal Statement
- School Reference letter
- IELTS Certificate (where available)

### Documents we may hold at some time on behalf of a student

- School application form
- School offer / rejection letter
- Parent signed Acceptance form
- Funds transfer documents
- Certificate of Acceptance for Study (CAS)
- Medical records
- Ongoing school progress reports
- Notarised documents


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