



# CAMBRIDGE INTERNATIONAL ACADEMY

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## Cambridge International Academy Ltd GDPR Compliance Statement

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### Part 1 - General Introduction

The EU General Data Protection Regulation (“GDPR”) comes into force across the European Union on 25<sup>th</sup> May 2018 and brings with it the most significant changes to data protection law in two decades. Based on privacy by design and taking a risk-based approach, the GDPR has been designed to meet the requirements of the digital age.

The 21<sup>st</sup> Century brings with it broader use of technology, new definitions of what constitutes personal data, and a vast increase in cross-border processing. The new Regulation aims to standardise data protection laws and processing across the EU; affording individuals stronger, more consistent rights to access and control their personal information.

Company Name: Cambridge International Academy Ltd - Company No. 09662831 - Registered in England  
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## Our Commitment

Cambridge International Academy is committed to ensuring the security and protection of the personal information that we process, and to provide a compliant and consistent approach to data protection. We have always had a robust and effective data protection programme in place which complies with existing law and abides by the data protection principles. However, we recognise our obligations in updating and expanding this programme to meet the demands of the GDPR and the UK's Data Protection Bill.

We are dedicated to safeguarding the personal information under our remit and in developing a data protection regime that is effective, fit for purpose and demonstrates an understanding of, and appreciation for, the new Regulation. Our preparation and objectives for GDPR compliance have been summarised in this statement and include the development and implementation of new data protection roles, policies, procedures, controls and measures to ensure maximum and ongoing compliance.

## How We Prepared for the GDPR

Cambridge International Academy already had a consistent level of data protection and security across the company, however it is our aim to be fully compliant with the implementation of the GDPR on May 25<sup>th</sup>, 2018.

### ***Our preparation has included: -***

1. ***Information Audit*** - carrying out an information audit to identify and assess what personal information we hold, where it comes from, how and why it is processed and if and to whom it is disclosed.
2. ***Policies & Procedures*** – revising/introducing and implementing data protection policies and procedures to ensure they meet the requirements and standards of the GDPR and any relevant data protection laws, including: -
  - a) ***Data Protection*** – Accountability and governance measures are in place to ensure that we understand and adequately disseminate and evidence our obligations and responsibilities; with a dedicated focus on privacy by design and the rights of individuals.
  - b) ***Data Retention & Erasure*** – we have updated our retention policy and schedule to ensure that we meet the ‘*data minimisation*’ and ‘*storage limitation*’ principles and

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that personal information is stored, archived and destroyed compliantly and ethically. We have dedicated erasure procedures in place to meet the new 'Right to Erasure' obligation and are aware of when this and other data subject's rights apply; along with any exemptions, response timeframes and notification responsibilities.

- c) **Data Breaches** – our breach procedures ensure that we have safeguards and measures in place to identify, assess, investigate and report any personal data breach at the earliest possible time.
  - d) **International Data Transfers & Third-Party Disclosures** – where Cambridge International Academy stores or transfers personal information outside the EU, we have robust procedures and safeguarding measures in place to secure, encrypt and maintain the integrity of the data. Our procedures include a continual review of the countries with sufficient adequacy decisions, as well as provisions for binding corporate rules; standard data protection clauses or approved codes of conduct for those countries without. We carry out strict due diligence checks with all recipients of personal data to assess and verify that they have appropriate safeguards in place to protect the information, ensure enforceable data subject rights and have effective legal remedies for data subjects where applicable.
  - e) **Subject Access Request (SAR)** – we have revised our SAR procedures to accommodate the revised 30-day timeframe for providing the requested information and for making this provision free of charge. Our new procedures detail how to verify the data subject, what steps to take for processing an access request, as well as what exemptions apply.
3. **Legal Basis for Processing** - we are reviewing all processing activities to identify the legal basis for processing and ensuring that each basis is appropriate for the activity it relates to. Where applicable, we also maintain records of our processing activities, ensuring that our obligations under Article 30 of the GDPR and Schedule 1 of the Data Protection Bill are met.
  4. **Privacy Notice/Policy** – we have revised our privacy notices to comply with the GDPR, ensuring that all individuals whose personal information we process have been informed of why we need it, how it is used, what their rights are, who the information is disclosed to and what safeguarding measures are in place to protect their information.
  5. **Obtaining Consent** - we have revised our consent mechanisms for obtaining personal data, ensuring that individuals understand what they are providing, why and how we use it and giving clear, defined ways to consent to us processing their information. We have developed stringent processes for recording consent, making sure that we can evidence an affirmative opt-in, along with time and date records; and an easy to see and access way to withdraw consent at any time.

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6. **Special Categories Data** - where we obtain and process any special category information, we do so in complete compliance with the Article 9 requirements and have high-level encryptions and protections on all such data. Special category data is only processed where necessary and is only processed where we have first identified the appropriate Article 9(2) basis or the Data Protection Bill Schedule 1 condition. Where we rely on consent for processing, this is explicit and is verified by a signature, with the right to modify or remove consent being clearly signposted.

## Data Subject Rights

In addition to the policies and procedures mentioned above that ensure individuals can enforce their data protection rights we provide easy to access information, via our website and during induction procedures, of an individual's right to access any personal information that Cambridge International Academy processes about them and to request information about: -

- What personal data we hold about them
- The purposes of the processing
- The categories of personal data concerned
- The recipients to whom the personal data has/will be disclosed
- How long we intend to store your personal data for
- If we did not collect the data directly from them, information about the source
- The right to have incomplete or inaccurate data about them corrected or completed and the process for requesting this
- The right to request erasure of personal data (*where applicable*) or to restrict processing in accordance with data protection laws, as well as to object to any direct marketing from us and to be informed about any automated decision-making that we use
- The right to lodge a complaint or seek judicial remedy and who to contact in such instances

## Information Security & Technical and Organisational Measures

Cambridge International Academy takes the privacy and security of individuals and their personal information very seriously and we take every reasonable measure and precaution to protect and secure the personal data that we process. We have robust information security policies and procedures in place to protect personal information from unauthorised access,

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alteration, disclosure or destruction and have appropriate security measures in place, including password protected access confined to only relevant personnel and secure storage.

## GDPR Roles in the Company

Cambridge International Academy's directors are responsible for promoting awareness of the GDPR across the company, assessing our GDPR readiness, identifying any gap areas and implementing new policies, procedures and measures. Cambridge International Academy understands that continuous employee awareness and understanding is vital to continued compliance with the GDPR.

## Part 2 – Cambridge International Academy – How we deal with your data

### Whose data do we handle and store?

As an accredited educational organization we request, handle and store information provided by applicants wishing to participate in our educational programmes. These include *administrative and academic staff* wishing to work with the company, and *students* applying to enroll on our programmes.

Here we explain a) why we need your information, b) how it is used, c) who the information is disclosed to, d) what safeguarding measures are in place to protect it and e) what your rights are.

#### 1. Academic and Administrative Staff

##### a) Why we need your information

*With respect to applicants* for advertised academic and administrative positions with the company, we request the usual information required to assess initial suitability. Unsuccessful applicants who may however be suitable for a role in the company in the future may be asked if they are happy to allow us to archive the information they have provided and for us to

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contact them in the future if a potentially suitable position may arise. All information about unsuccessful applicants' details, or about applicants whose information we are interested in maintaining but who do not wish us to do so, is securely erased from our records forthwith.

*With respect to employees* we require normal payroll data concerning the employees NI no., bank details etc., solely in order to carry out payments and comply with statutory regulations concerning HMRC etc.

As our programmes are designed for young people under 18 we require robust safeguarding procedures to be implemented and a condition of your employment with us is satisfactory reference letters and your possession of an up to date 'Enhanced DBS' certificate.

## **b) How it is used**

All the information you provide is used **ONLY** to confirm your suitability to work with Cambridge International Academy as a member of our team.

## **c) Who your information is disclosed to**

Your information is disclosed to the relevant company employee(s) dealing with the recruitment of staff. Under no circumstances is your information disclosed to any third party except in circumstances required for purposes of accreditation (see further below) or demanded by law.

Apart from the relevant company employees cited above, your information is only available for viewing by inspectors from our accrediting body, the British Accreditation Council, and then only to the extent required to confirm our adherence to the minimum standards required for accreditation. Typically this will extend to your CV, references and Enhanced DBS status.

## **d) Safeguarding measures to protect your information**

All your information is stored on password protected, up to date company computers that have reliable antivirus, anti-hacking and malware protection. Any hard copies are kept in secure locked filing cabinets accessible only by the company directors.

## **e) Your rights**

You are welcome to ask us to verify what information we are holding and to rectify or erase records, provided the erasure of records does not conflict with our statutory, regulatory, legal and accreditation obligations.

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We are committed to your right to privacy and in the event of any concerns in this regard we confirm our readiness to actively seek to remedy any such anxieties immediately upon being informed. Also see the link to the Information Commissioner's Office given below.

## 2. Students

### a) Why we need your information

*Academic* - We require the normal academic background information needed to assess initial suitability for admission to our programme. This information is used only to form a judgement as to your suitability for the programme and optimizing your programme learning experiences. All information about unsuccessful applicants' details is securely erased from our records forthwith.

*Non-academic* – All other information we require is directly related to safety and welfare considerations, such as parental contact, medical and allergy information.

### b) How it is used

All the information you provide is used ONLY to confirm your suitability to participate successfully and safely on our programme.

### c) Who your information is disclosed to

Your information is disclosed to the relevant company employee(s) dealing with the admission of students. Under no circumstances is your information disclosed to any third party except in circumstances required for the purpose of enhancing your learning experiences on the programme, safety and welfare, accreditation requirements (see below) or demanded by law.

Personal information about allergies and medical conditions will be made available to partners on the programme as required for your safety and welfare.

An aggregated version of participants' academic backgrounds may be shared with the staff of universities we will visit during the programme, for the purpose of better tailoring the visit to our students' overall needs.

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Your information may also need to be made available for viewing by inspectors from our accrediting body, the British Accreditation Council, but then only to the extent required to confirm our adherence to the minimum standards required for accreditation. Typically this will extend to your application form and academic background only.

## d) Safeguarding measures to protect your information

All your information is stored on password protected, up to date company computers that have reliable antivirus and anti-hacking protection. Any hard copies are kept in secure locked filing cabinets accessible only by the company directors.

## e) Your rights

You are welcome to ask us to verify what information we are holding and to rectify or erase records, provided the erasure of records does not conflict with our statutory, regulatory, legal and accreditation obligations.

We are committed to your right to privacy and in the event of any concerns in this regard we confirm our readiness to actively seek to remedy any such anxieties immediately upon being informed. Also see the link to the Information Commissioner's Office given below.

### 3. The Information Commissioner's Office

As well as our formal complaints procedure and, failing that, our accreditor's complaints procedure, if we still cannot satisfy your anxieties about how we store and / or use your personal data, you should refer to the website of the Information Commissioner's Office at <https://ico.org.uk/for-the-public/> - though we are confident that this will not be necessary.

If you have any questions or concerns with regard to the information we hold about you and / or our compliance with the GDPR, please contact Dr Jonathan Robert Fearon-Jones by either:

**Post:** 20 Station Road, Cambridge CB1 2JD or **Email:** jon@camintac.co.uk

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