

## **BHS Privacy Policy**

### **1. Purpose**

This policy explains how Beaufort House School processes personal data fairly, lawfully, transparently and securely. It sets out the School's general privacy commitments and the core information individuals are entitled to receive under data protection law.

### **2. Scope**

This policy applies to personal data processed by or on behalf of BHS in relation to current, former and prospective learners, parents, carers, staff, applicants, volunteers, contractors, governors or advisers if later appointed, visitors, alumni, donors and other individuals connected with the School.

### **3. Legal framework**

BHS will process personal data in line with the UK General Data Protection Regulation, the Data Protection Act 2018, the Privacy and Electronic Communications Regulations 2003 where relevant, and other applicable law and guidance relating to schools, safeguarding, employment, equality and records management.

### **4. Data controller and contact details**

Beaufort House School is the data controller for the personal data covered by this policy. The School can be contacted at 2 - 4 Ashworth Road, London W9 1JY. Privacy queries, information rights requests and data protection concerns should be sent to [privacy@beauforthouseschool.co.uk](mailto:privacy@beauforthouseschool.co.uk). If the School appoints a Data Protection Officer or external data protection adviser, their contact details will be published and used for the purposes required by law.

### **5. Core data protection commitments**

- lawful, fair and transparent
- collected for specified, explicit and legitimate purposes
- adequate, relevant and limited to what is necessary
- accurate and kept up to date where needed
- kept no longer than necessary
- processed securely, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage
- supported by records, controls and review so that compliance can be demonstrated

### **6. The personal data BHS may process**

Depending on context, BHS may process personal data including:

- identity and contact details
- family, emergency contact and parental responsibility information
- admissions, enrolment and attendance information

- assessment, progress, curriculum and pastoral information
- safeguarding, welfare, behaviour and wellbeing information
- health, medical, dietary, SEND and accessibility information
- financial, billing and payment information
- photographs, video, CCTV or access control records where used lawfully and proportionately
- recruitment, employment, training, payroll and pension information
- DBS and safer recruitment information where relevant
- website, portal and communications data where individuals use School systems or contact the School

## **7. Where BHS gets personal data from**

BHS may obtain personal data directly from the individual, from parents or carers, from previous settings or schools, local authorities, professionals supporting the child or family, referees, regulators, examination or curriculum providers, safeguarding agencies, service providers, and from lawful use of School systems, devices, access controls or websites.

## **8. Why BHS processes personal data**

BHS may process personal data for purposes including:

- running the School safely, lawfully and effectively
- considering enquiries, registrations and admissions
- educating, supporting and safeguarding learners
- communicating with parents, carers and families
- meeting health, welfare, SEND and accessibility needs
- managing behaviour, attendance, pastoral support and complaints
- operating employment, recruitment and safeguarding checks
- administering fees, contracts, insurance, audits and professional advice
- maintaining records, governance, legal compliance and business continuity
- managing the website, portal access, cybersecurity and essential digital services
- sending communications where the School has a lawful basis to do so

## **9. Lawful bases**

BHS will identify and record an appropriate lawful basis for each processing activity. Depending on the activity, this will usually be one or more of the following:

- performance of a contract or steps taken before entering into a contract
- compliance with a legal obligation
- legitimate interests pursued by the School or by a third party, provided those interests are not overridden by the rights and freedoms of the individual
- vital interests where processing is needed to protect someone's life
- consent where this is genuinely appropriate and can be freely withdrawn

Where BHS processes special category data, such as health, SEND, safeguarding, ethnicity, religion or biometric data if ever adopted, it will also identify a valid additional condition under the law.

Where criminal offence data is processed, including DBS and safeguarding vetting information, BHS will ensure that a lawful basis and a permitted condition are in place.

#### **10. Children's data**

BHS recognises that children's personal data merits particular care. The School will use clear language, take account of the child's age and understanding, and apply a high level of protection when processing children's data. Where online services are offered directly to children and consent is relied upon, BHS will apply the relevant rules on children's consent.

#### **11. Sharing personal data**

BHS will share personal data only where there is a lawful basis and a proper reason to do so. Recipients may include local authorities, safeguarding partners, health professionals, previous or future schools, examination or curriculum providers, insurers, lawyers, auditors, IT and cloud service providers, payroll or pension providers, regulators, and professional advisers.

BHS may share information without consent where this is lawful and necessary, including for safeguarding, child protection, prevention or detection of crime, protection of vital interests, legal compliance, insurance, or the establishment, exercise or defence of legal claims.

Where a learner moves to another school or setting, BHS will transfer records securely and in line with legal and safeguarding requirements.

#### **12. International transfers**

BHS seeks to use providers and systems that support lawful and secure processing. If personal data is transferred outside the United Kingdom, BHS will ensure that an appropriate transfer mechanism and safeguards are in place, and will provide relevant privacy information as required.

#### **13. Storage, retention and disposal**

BHS will keep personal data only for as long as reasonably necessary for the purpose for which it was collected, or for longer where required for safeguarding, legal, regulatory, accounting, insurance, limitation or archival reasons. The School will maintain retention rules or schedules and will dispose of data securely when it is no longer needed.

#### **14. Security**

BHS will use proportionate technical and organisational measures to protect personal data. These may include access controls, role based permissions, secure storage, password and device controls, encryption where appropriate, staff training, confidentiality expectations, supplier due diligence, secure destruction and incident management.

Personal data will be accessible only to those who need it for a proper purpose. Staff, volunteers and contractors are expected to follow School policies and confidentiality requirements.

#### **15. Personal data breaches**

BHS will have procedures for identifying, containing, assessing, recording and responding to suspected personal data breaches. Where a breach is notifiable, BHS will report it to the

Information Commissioner's Office without undue delay and, where feasible, within 72 hours of becoming aware of it. Where required, BHS will also communicate the breach to affected individuals without undue delay.

## **16. Individual rights**

Individuals have rights under data protection law, subject to the limits and exemptions in the law. Depending on the circumstances, these may include the right to:

- be informed about how personal data is used
- request access to personal data
- request correction of inaccurate or incomplete data
- request erasure in some circumstances
- request restriction of processing in some circumstances
- object to processing in some circumstances
- request data portability where the law provides for it
- withdraw consent where consent is the lawful basis
- complain to the Information Commissioner's Office

The right to object will be brought specifically to the attention of individuals where that right applies. Requests should be sent to the School using the privacy contact details in this policy.

As an independent school in England, BHS will deal with access requests in line with data protection law. Where a request relates to a child, the School will consider the child's age, maturity, understanding, parental responsibility, confidentiality, safeguarding risk and the rights of others.

## **17. Marketing, website forms and cookies**

Where BHS collects personal data through its website, enquiry forms, event registration, newsletters or similar communications, it will provide appropriate privacy information at or before the point of collection.

If BHS uses cookies or similar technologies on its website, it will tell users what those technologies do and why they are used. Non essential cookies or similar technologies will be used only where the required consent has been obtained. Essential technologies may be used where they are strictly necessary for the service requested by the user.

BHS will send electronic marketing to individuals only where it has a lawful basis and, where required, valid consent or another lawful route under the relevant electronic communications rules.

## **18. Photographs, video and CCTV**

Where BHS uses photography, video, livestreaming, access control or CCTV, it will do so for clear and lawful purposes, use proportionate controls, and provide any additional notices, signage or consent requests required by law and by the circumstances.

## **19. Data protection impact assessments**

BHS will assess privacy risk where processing is likely to result in a high risk to the rights and freedoms of individuals. This may include new systems, new categories of sensitive information, extensive sharing, surveillance technology, biometric processing, or significant changes in how the School uses personal data.

## **20. Staff training and accountability**

Data protection is not only a paper exercise. BHS will ensure that staff receive appropriate induction, training and guidance, that responsibilities are clear, and that compliance can be evidenced through records, review and management oversight.

## **21. Related documents**

This policy should be read alongside other relevant BHS documents, including where applicable:

- Safeguarding and Child Protection Policy
- Safer Recruitment Policy and SCR Procedure
- Online Safety Policy
- Admissions Policy and parent entry documents
- Behaviour Policy and Anti Bullying Policy
- Complaints Policy and Procedure
- First Aid, Medical, Intimate Care and Health and Safety documents
- Records retention, information security and breach response procedures
- any specific privacy notices issued by the School for parents, learners, staff, applicants, volunteers, contractors or website users

## **22. Complaints and contact with the ICO**

Anyone who is unhappy with how BHS has handled personal data should raise the matter with the School first using the privacy contact details above. Individuals also have the right to complain to the Information Commissioner's Office, which is the UK supervisory authority for data protection.

## **23. Review and publication**

This policy will be reviewed at least annually and sooner if law, guidance, systems or School practice changes. It will be published or made available in the School's normal parent and public information channels. More specific privacy notices may sit beneath this policy where BHS needs to provide additional detail for particular groups or processing activities.