

Definitions

"Personal data" means any information relating to an identified or identifiable natural person ("data subject")

an **"identifiable person"** is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that person

"Processing" means any operation or set of operations performed upon personal data or sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Policy Statement

Bournemouth Collegiate School (BCS) values the personal information entrusted to us and will process personal data in accordance with the principles set out in the General Data Protection Regulation (GDPR). BCS has put in place policies, procedures and guidance to ensure that we will always:

- *determine the legal basis for the processing of personal data and document this*
- *be open with individuals about how we use their information and who we give it to*
- *only process personal data in a manner consistent with the purpose for which it was collected*
- *consider and address the privacy risks when we are planning to use or hold personal information in new ways, such as when introducing new systems*
- *have processes in place to ensure the accuracy of personal data held*
- *keep personal information to the minimum necessary and delete it when we no longer need it*
- *have processes in place to enable individuals to exercise their rights as set out in the GDPR*
- *have appropriate technical and organisational measures in place to make sure personal information is kept securely and only accessed on a need to know basis*
- *provide training to staff who handle personal information and treat it as a disciplinary matter if they misuse or don't look after personal information properly*
- *put appropriate financial and human resources into looking after personal information.*

This document is applicable to all pupils in both senior and prep schools, including those in boarding and EYFS, staff and other adults and BCS seeks to implement this policy through adherence to the procedures set out in the rest of this document.

In line with our Provision of Information policy, this document is available to all interested parties on our website and on request from the Senior school and Prep school offices.

This document is reviewed annually by the Business Manager, or as events or legislation change requires. The next scheduled date for review is November 2021.

Accountability

To enable BCS to demonstrate compliance with the GDPR regulations we will implement the following Data Protection policies and procedures, and maintain appropriate records as required by these procedures:

Transparency

1. Privacy notices for pupils and parents
2. Employee data protection policy

Privacy Rights

3. Rights of the data subject policy
4. Guidance on the rights of the data subject

Accountability and Records Management

5. Records Management Policy
6. Records Retention Schedule
7. Procedure for keeping records of data processing activities

Security of Personal Data

8. Security of personal data policy
9. Acceptable usage policy
10. Procedure for the secure transfer of files
11. Bring your own device to work policy
12. Procedure for notification of a personal data breach
13. Data sharing policy and procedure
14. Data Protection Impact assessment policy, procedure and guidance

All staff receive data protection training appropriate to their role.