

# British Overseas School: Data Protection Policy



## Statement

The British Overseas School recognises that personal data, particularly relating to children, is entrusted to us. We take that trust seriously. We manage information thoughtfully, proportionately, and with care, balancing transparency with the need to protect individual rights and welfare.

## 1. Purpose

The British Overseas School is committed to protecting the personal information of all individuals connected with the school. We hold personal data about pupils, parents, families, staff, and others in order to provide education, safeguard welfare, communicate effectively, and meet our legal obligations. We handle data lawfully, fairly, and transparently, taking active steps to maintain accuracy, confidentiality, and security. This policy explains how personal data is collected, stored, used, shared, and disposed of in accordance with the UK General Data Protection Regulation (GDPR).

## 2. Scope

This policy applies to:

- Pupils and former pupils
- Parents, guardians, and families
- Staff (academic and support)
- Governors
- Contractors, consultants, and volunteers
- Applicants and visitors
- Alumni (where data is retained)

It covers all personal data held by the school in any format, including digital records, paper files, photographs, audio recordings, and CCTV footage. Anyone acting on behalf of the school who processes personal information must comply with this policy and exercise professional judgement.

### 3. Key Definitions

Personal data is information that identifies a living individual. Some categories are more sensitive, such as health, ethnicity, religious beliefs, biometric data, and safeguarding records. Processing includes collecting, storing, sharing, altering, or destroying data. The school acts as the data controller, determining how personal data is used. External service providers may act as data processors under written agreement.

### 4. Data Protection Principles

BOS processes personal data in accordance with GDPR:

- It must be processed lawfully, fairly, and transparently.
- It must be collected for specified, legitimate purposes.
- It must be adequate, relevant, and limited to what is necessary.
- It must be accurate and kept up to date.
- It must not be retained longer than necessary.
- It must be kept secure.
- The school must be able to demonstrate compliance.

### 5. Legal Bases for Processing

We process personal data under lawful grounds such as contractual necessity (education and employment), legal obligation (safeguarding and compliance), vital interests (preventing harm), public interest, and legitimate interests linked to school operation. Consent may also be used and can be withdrawn. Special category data is subject to additional safeguards.

### 6. Types of Personal Data We Collect

We collect personal data for educational, safeguarding, administrative, and operational purposes. This may include:

- Admissions and enrolment information
- Academic, progress, and attendance records
- Behavioural and safeguarding notes

- Medical and dietary information
- Parent and guardian contact details
- Records of parental communication
- Participation in events and activities
- Staff employment and appraisal records
- CCTV footage for safety and security

## 7. Use of Personal Data

We use personal data to deliver education, support pastoral care, communicate with parents, manage staffing, comply with legal duties, and maintain a safe environment. We do not use personal data for purposes incompatible with these aims. When considering new uses, we review our legal basis and seek consent where required.

## 8. Data Sharing

We may share personal data with trusted third parties when necessary and lawful, such as:

- Examination boards and assessment providers
- Safeguarding authorities and health professionals
- Other schools (when a pupil transfers)
- Regulatory bodies
- Professional advisers
- Technology and service providers

We require written assurances confirming secure handling and GDPR compliance. We do not sell personal data. Information may be shared with parents and guardians to keep them informed of a child's progress, welfare, attendance, and achievements.

## 9. Transfers across Borders

If personal data is transferred internationally, we ensure adequate protection through recognised safeguards, contractual arrangements, or assurances that the receiving environment provides appropriate security.

## 10. Data Retention

Personal data is retained only for as long as necessary. Some records must be kept for statutory or safeguarding reasons; others are disposed of sooner. Specific periods are set out in the school's Data Retention Schedule. When no longer required, data is destroyed securely.

## 11. Data Security

We protect personal data through technical and organisational measures, including secure servers, strong passwords, role-based access, encrypted devices where appropriate, and locked storage for sensitive records. Staff are trained to recognise risks and handle information responsibly. Any suspected data breach must be reported immediately to the Data Protection Lead. Access to pupil records is restricted to staff who require it for their role.

## 12. Rights of Individuals

Individuals have rights regarding their personal data, including the right to:

- Be informed about how it is used
- Access the information we hold
- Request correction of inaccurate data
- Request deletion in certain circumstances
- Restrict processing
- Object to particular uses
- Request portability of certain data

Parents and guardians may exercise these rights on behalf of their children, subject to age, maturity, and safeguarding considerations.

## 13. Subject Access Requests (SARs)

Requests to access personal data should be made in writing. We will respond within one month. Data will be provided securely and may be withheld where disclosure would compromise safeguarding, legal privilege, or the rights of others. Older pupils may, in some circumstances, exercise their data rights directly.

## 14. Consent

Where consent is required, we explain clearly what is being asked and why. Consent may be withdrawn at any time. We avoid seeking consent where another lawful basis already applies. For younger pupils, consent is sought from parents or guardians.

## 15. Photographs, Video, and Media

Images may be taken for educational, pastoral, or promotional purposes. Consent is sought before using such images publicly, particularly on websites or social media. CCTV footage is retained for a limited period and accessed only for security or safeguarding reasons.

## 16. Data Breaches

A data breach is any incident where personal data is lost, disclosed without authorisation, altered improperly, or accessed unlawfully. The Data Protection Lead will investigate promptly, take steps to contain the breach, and maintain a written record. Serious breaches may be reported to relevant authorities, and affected individuals will be informed where appropriate.

## 17. Data Protection by Design

We consider data privacy when implementing new systems, services, or technologies. For high-risk activities, we conduct a Data Protection Impact Assessment to identify risks and appropriate controls, with particular emphasis on pupil records.

## 18. Training and Awareness

All staff receive induction and refresher training. Volunteers and contractors who may handle personal data are briefed appropriately. We promote a culture of careful management and professional responsibility.

## 19. Responsibilities

Overall responsibility lies with the Head of School. The Data Protection Lead advises on compliance, coordinates incident responses, and maintains relevant records. Each member of staff must handle information securely and report concerns promptly.

## 20. Governance Oversight

The governing body receives summary reports on data protection matters, including any significant breaches, and monitors compliance with evolving regulation and best practice.

## 21. Review of Policy

This policy is reviewed annually or sooner if required by changes in law, technology, or context. Updated versions are communicated to staff.