

BCS Privacy Notice

Who we are

This is the Privacy Notice of Brighton College Services Limited (**BCS** or **we**).

BCS is a wholly owned subsidiary of Brighton College (the **College**). Our principal activities are running Rockhoppers, and other holiday Camps at the College Prep and Pre-Prep sites, the Rockhoppers after-school Camp at the Pre-Prep and the commercial trading activities of the College, including the hiring of the College's estate. BCS's income is gift aided to the College for use for its charitable objects.

BCS is a data controller registered with the Information Commissioner's Office under registration number 00017855459. This is a separate registration to that of the College. Whilst the activities of BCS and the College are closely linked, this notice applies specifically to the activities of BCS.

Introduction

This notice is intended to provide information about how we will use personal data about individuals in a number of categories including: BCS employees; staff and governors of the College; pupils of the College; wedding couples and guests; room/building hirers; Holiday Camps which may be attended by children who are not College pupils and attendees of events arranged with BCS. It covers current, past and prospective individuals within each of those categories.

This notice is to help you understand how and why we collect personal information about you and what we do with that information. It also explains the decisions that you can make about your own information.

Personal information or personal data is information that we hold about you and which identifies you. Examples include: your name and contact details; financial information; and photos and video recordings of you.

Why we process personal data

We need to process personal data about individuals in order to carry out our ordinary operations and responsibilities.

We commonly use personal information for:

- ensuring that we provide a safe and secure work environment;
- fulfilling our contractual and other legal obligations;
- protecting and promoting BCS and the College's interests and objectives; and
- personnel, administrative and management purposes, and to enable us to meet our legal obligations as an employer, like paying and appraising employees.

Some of this activity we will need to carry out in order to fulfil our legal rights, duties or obligations, including those under a contract. Other uses of personal data will be made in accordance with our legitimate interests, or the legitimate interests of the College, provided that these are not outweighed by the impact on individuals. More information about our legal grounds for processing your personal information is included later in this notice.

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Often, you provide us with information about yourself during the course of our relationship with you. In addition, we will sometimes obtain your information from other sources. We set out below examples of the different ways in which we gather, use and share personal information.

BCS employees

- Information about you is gathered during the recruitment process, for example:
 - information about your education, qualifications and professional achievements; information you have provided to us, for example, on your application form and during any interviews;
 - information obtained by us from publicly available sources such as your social media profiles; and
 - information (from you and third parties) received to enable us to carry out pre-employment checks; for example, when we receive references, confirmation of your fitness to work, your right to work in the UK and criminal records checks.
- We will hold information about your job performance. This includes information about skills, achievements, career progression, performance and disciplinary related matters.
- We hold and use your financial information, such as your bank details, your salary and pension details.
- If you inform us, we may have information about your religious beliefs and practices or information that may indicate such; for example, if you do not eat certain foods.
- We will hold information about any physical or mental health condition you may have which is disclosed to us during the recruitment process or at any stage during your employment.
- We will hold information about any protected characteristics you may have (e.g. a disability) which you provide.
- Some of your personal information will be created internally by us during the course of your employment, such as appraisal documentation.
- Some of your personal information may be acquired from outside BCS such as from occupational health practitioners or from public authorities.
- All this information is shared with the College HR department and some of your personal information will be held on the College's Single Central Register.

Weddings and other events managed by BCS

- Information about you is gathered during the wedding/event planning process.
- We will collect financial information about you in order to process payments for weddings taking place at Brighton College, including for the room hire, drinks, and food.
- We may share information with caterers or other companies involved in carrying out the wedding, for example, may need your contact details and be made aware of any dietary or medical needs.
- We may share photographs or videos of the wedding/event with Brighton College for the school website and social media sites, prospectuses, and in bespoke marketing brochures, to show prospective wedding parties what we do here and to advertise the College, and to support the promotion and marketing of the College and BCS. We may continue to use these photographs and videos after the day of your wedding.
- CCTV is used around the school to ensure your safety. CCTV is not used in private areas such as changing rooms.

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Letting of College facilities

- We will collect financial information about you in order to process payments for the letting of facilities and premises.

Residential Lets

- Residential Lets are managed by an outside organisation, and not BCS or the College, and they are the data controllers.
- We may be given your personal data from information you have supplied to third parties who are running residential courses.
- CCTV is used around the school to ensure your safety. CCTV is not used in private areas such as changing rooms.

After School Club

- The After School Club booking forms which your parents complete provides us with personal information about you. This information is used to ensure that the After School Club can be run safely and effectively. For example, to create a log of pupils attending the After School Club, and to ensure pupils can be identified during the After School Club.
- The staff and others who look after you need to know your medical information (such as allergies), and whether you require additional support with certain activities. This is to safeguard your welfare and provide appropriate pastoral (and where necessary, medical) care, including in the event of an emergency. We may need to share information about your health and well-being with the Catering contractor, the College Nurse, Counsellor or members of the College Health Centre team.
- Where there are safeguarding concerns we may share your personal information with social services, the police and other outside organisations.
- We may share information with caterers or organisers of trips or events connected with the After School Clubs who, for example, may need your contact details and be made aware of any dietary or medical needs.
- We may share photographs or videos of you with Brighton College for the school website and social media sites, prospectuses, and in bespoke marketing brochures, to show prospective pupils what we do here and to advertise the College, and to support the promotion and marketing of the College and BCS, both here in the UK and overseas. We may continue to use these photographs and videos after you have left the After School Club.

Holiday Camps

- We may collect information from correspondence with parents of prospective Holiday Camp children, including those who are not College pupils to identify interest in attending Holiday Camp.
- The Holiday Camp booking forms which your parents complete give us personal information about you. This information is used to ensure that the Holiday Camp can be run safely and effectively. For example, to create a log of children attending the Holiday Camp, and to ensure children can be identified during the Holiday Camp.
- The staff and others who look after you need to know your medical information (such as allergies), and whether you require additional support with certain activities. This is to safeguard your welfare and provide appropriate pastoral (and where necessary, medical) care, including in the event of an emergency. We may need to share information about your

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health and well-being with the Catering contractor, the College Nurse, or members of the College Health Centre team.

- Where there are safeguarding concerns we may share your personal information with social services, the police and other outside organisations.
- We may share information with caterers or organisers of trips or events connected with the Holiday Camps who, for example, may need your contact details and be made aware of any dietary or medical needs.
- We may share photographs or videos of you with Brighton College for the school website and social media sites, prospectus, and in bespoke marketing brochures, to show prospective pupils what we do here and to advertise the College, and to support the promotion and marketing of the College and BCS, both here in the UK and overseas. We may continue to use these photographs and videos after you have left the Holiday Camp.
- We may share photographs or videos of you with Brighton College for the school website and social media sites, prospectuses, and in bespoke marketing brochures, to show prospective pupils what we do here and to advertise the College, and to support the promotion and marketing of the College and BCS, both here in the UK and overseas. We may continue to use these photographs and videos after you have left the Holiday Camp.
- CCTV is used around the school to ensure your safety. CCTV is not used in private areas such as changing rooms.

Staff and governors of the College

- We may hold some of the information identified above (under 'BCS employees'), for example:
 - You may have shared with us your personal information, such as your name, educational and professional history and passport details from your CV and job application forms if you apply via us for roles at the College.
 - We have personal information such as your name, passport details and loyalty schemes from your submitted expense claim forms or when we arrange travel or accommodation for you on BCS business – and we would share it with travel agents and airlines as necessary.
- The College may share staff photos and videos with us to show prospective afterschool/holiday let families and wedding parties what we do here and to advertise the College.
- We may share these photos or videos of you with Brighton College for the school website and social media sites and may continue to use these photographs and videos after you are no longer employed.
- We may have emergency contact details and medical information on staff who visit the College, so that those who look after you may safeguard your welfare and provide appropriate medical care, including in the event of an emergency. We may need to share information about your health and well-being with others, such as the catering contractor, the College Nurse, Counsellor or members of the College Health Centre team.

General

- We may have and share personal information about visitors to BCS with the College in order to liaise and organise visit schedules.

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- CCTV is used around the school to ensure your safety. CCTV is not used in private areas such as changing rooms.
- We may need to share information with the police or our legal advisers on occasion or to help with an inquiry. For example, if someone is injured at College or if there is a burglary.

Our legal grounds for using your information

This section contains information about the legal basis that we are relying on when handling your information. In many cases we will rely on more than one basis for a particular use of your information. The basis that we will rely on for a particular purpose may vary depending on the circumstances.

Legitimate interests

We will use your information when this is necessary for our legitimate interests except when your interests and fundamental rights override these. Specifically, we have a legitimate interest in: looking after staff, guest, and pupil health, welfare and development, and the health, welfare and development of others;

- facilitating the efficient operation of all BCS events, including weddings, Summer Residential (alongside the primary data controllers), After School Clubs, and Holiday Camps;
- safeguarding and promoting the health and welfare of pupils, children and visitors to the College;
- ensuring that we provide a safe and secure environment;
- protecting and promoting BCS and the College's interests and objectives;
- using appropriate photographs for promotional purposes;
- promoting the objects and interests of the College and the 'Brighton College' brand;
- making sure that both we and you are complying with relevant employment and statutory obligations;
- making sure that BCS is well managed so as to protect the College's reputation and brand;
- using your information in connection with legal disputes;
- to show prospective pupils and wedding parties what we do here and to advertise the College;
- to support the promotion and marketing of the College and its family of schools, both here in the UK and overseas; and
- intra-group transmission of personal data necessary for internal administrative purposes. For these purposes, we include each school that makes up the Brighton College family of schools.

In addition, your personal information may be processed for the legitimate interests of others, including the College.

Recognised legitimate interests

The College may rely on recognised legitimate interests where one of the following conditions is met:

- Where we share personal data with another organisation which has requested it because they need it for their public task or official functions.
- To respond to, or deal with, an emergency situation.
- To prevent, detect or investigate crimes.

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- To protect the physical, mental or emotional well-being of people who need extra support to do this or protect them from harm or neglect.

Necessary for contract

We will need to use your information in order to comply with our contractual obligations and for you to perform your obligations as well. For example:

- we need employee name and bank details so that we can pay you your salary or process expense claims; and
- to comply with the contracts we have in place for all activities managed by BCS.

Legal obligation

As a wholly owned subsidiary of the College we have to comply with various laws and this entitles us to use your information where necessary. For example:

- to make sure that staff have the right to work in the UK;
- to fulfil our duty of care to you and your colleagues;
- to fulfil our safeguarding duties towards pupils; and
- sometimes we will be legally obliged to disclose your information to third parties such as the DBS, local authorities or the police.

Vital interests

We may use your information where this is necessary to protect your vital interests or someone else's; for example, to prevent someone from being seriously harmed or killed.

Performance of a task carried out in the public interest (or carrying out public tasks)

The following are examples of when we use your information to perform tasks in the public interest:

- looking after your welfare and development and the welfare and development of others;
- safeguarding and promoting the welfare of our pupils;
- making sure that staff are complying with employment obligations; and ensuring that we comply with all of our legal obligations.

Special category personal information

We may also process special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic information; biometric information; health information; and information about sex life or orientation. The reasons why we may need to process this information might include:

- to safeguard your welfare and take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so; and
- for legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care.

Our lawful conditions for processing information falling into these categories are listed below.

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Substantial public interest

We are allowed to use special categories of personal information where doing so is necessary in the substantial public interest.

Employment and social protection and social security law

There will be times when we need to use your information because we are an employer or to comply with social protection law.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

Criminal offence information

In exceptional circumstances, we may use information about criminal convictions or offences. We will only do this where the law allows us to. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights or to look after pupils.

Consent

We may ask for your consent to use your information in certain ways as an alternative to relying on any of the legal grounds mentioned above. For example, we may ask for your consent before taking or using some photographs and videos if the photograph or video is more intrusive and we cannot rely on legitimate interests. We may also ask for your explicit consent before processing certain types of special category data. If we ask for your consent to use your personal information you can take back this consent at any time.

Any use of your information before you withdraw your consent remains valid. Please contact the Commercial & Events Lettings Manager if you would like to withdraw any consent that you have given.

Sending information to other countries

There are some circumstances in which we may need to send your information outside the UK. For example, this might arise where:

- We store information on servers based overseas.
- Third parties with whom we have a contractual arrangement store information on servers based overseas.
- We communicate with you or your family when you are overseas (for example, during the summer holidays if you live or are travelling overseas).

The level of protection for personal information varies from country to country, particularly those outside the EU or EEA. We are permitted to transfer personal data into countries covered by UK adequacy regulations. For other countries, we will only transfer personal data where there are

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appropriate safeguards in place and after we have carried out a transfer risk assessment, or where there is an exception under UK GDPR permitting the transfer.

If you have any questions about the safeguards that are in place, please write to the Bursar.

How long do we keep your information for?

We keep your information for as long as we need to. In exceptional circumstances we may keep your information for a longer time than usual, but we would only do so if we had a good reason and only if we are allowed to do so under data protection law. In all cases, we will retain personal data securely and only in line with how long it is necessary to keep for a legitimate reason.

What decisions can you make about your information?

Data protection legislation gives you a number of rights regarding your information. We have summarised these below but please note that the legislation is complex and your rights are often not absolute and/or may be subject to other overriding considerations. In summary, your rights are as follows:

- Rectification: if information is incorrect you can ask us to correct it.
- Access: you can also ask what information we hold about you and be provided with a copy. This is commonly known as making a subject access request. You may also ask for other supplementary information, such as why we use this information about you, where it came from and what types of people we have sent it to. Please note that the College will make reasonable and proportionate searches for your data and we may ask you to clarify your request if it appears overly-broad, to ensure that we are searching for the right categories of data.
- Deletion: you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- Portability: you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.
- Restriction: our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- Object: you may object to us using your information where:
 - we are using it for direct marketing purposes;
 - the legal basis on which we are relying is either legitimate interests or performance of a task carried out in the public interest; or
 - we are using it for historical or scientific research purposes or archiving purposes, unless the processing is necessary for the performance of a task carried out for reasons of public interest.

Further information and guidance

The Commercial & Events Lettings Manager is the person responsible for managing how we look after personal data and deciding how it is shared. Email: gdpr@brightoncollege.net or write to: Commercial & Events Lettings Manager, Brighton College Services, Eastern Road, Brighton, East Sussex, BN2 0AL

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Complaints

You can make a complaint to us if you think we have infringed your rights in your personal data. We have a data protection complaints policy which is available on request. To make a complaint, you can do any of the following:

- Ask for a complaint form: email GDPR@brightoncollege.net and we will send you a blank form which you can complete and return to us by email or post
- Write to us: The Bursar, Brighton College, Eastern Road, Brighton, East Sussex, BN2 0AL
- Email us: GDPR@brightoncollege.net

We aim to respond to all complaints without undue delay and will acknowledge a complaint within 30 days from the date on which we received them.

We are committed to dealing with all data protection complaints in a timely and courteous manner. However, we understand that there may be occasions where individuals are unhappy with our process or the outcome. You have the right to complain to, or seek advice from, the ICO. Further details are available at: www.ico.org.uk. It is important to note that the ICO may decline to deal with a complaint unless our internal complaints process set out above has been followed first.

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