



General Privacy Notice (How we use personal information)¹

This privacy notice explains how we collect, store and use personal data from those with whom we have a relationship that is not that of an employer/employee or volunteer or school/student relationship.²

You may be a parent, contractor, supplier, hirer or user of a facility in our School, or a visitor or member of the public. You may have given us information by completing forms that we provide or because you contacted us directly by email or telephone, indirectly by social media or via our website or other marketing material.

You have a legal right to be informed about how our School, and Bohunt Education Trust, uses any personal information that we hold about you. To comply with this, we provide a “privacy notice” to you where we are processing your personal data. This privacy notice explains how we collect, store and use personal data about you.

Our School is part of Bohunt Education Trust, which is the “data controller” for the purposes of data protection law. For any information about how our School complies with data protection you may contact the School Data Protection Contact or the Bohunt Education Trust Data Protection Officer.

In our School the Data Protection Contact is:

Mr Liam Harris

Tel: 01403 627430

Email: lharris@bohunthorsham.com

The Data Protection Officer for the Bohunt Education Trust is:

SchoolPro TLC

Address: Commercial House, 2 Abbeymead Avenue, Abbeymead, Gloucester, GL4 5UA

Tel: 01452 947633

Email: contact@schoolpro.uk

The categories of personal information about you that we may collect, hold and share include:

- Personal identifiers (such as name, and contact details and contact preferences)

¹ NB this notice does not cover Parents Associations/Appeal Funds at all; these are all entities that are not part of BET and therefore, are not included by the BET privacy notices. These entities must have their own documentation and Privacy Notices.

² For information about how we collect, store and use personal data we collect about students and/or members of staff/volunteers/job applicants, please see our privacy notices for students, and for staff/volunteers/job applicants.

- Billing, and payment details including bank details and where relevant supplier credit worthiness checks
- Records of attendance or visits in School;
- Photographs, and other multi media recordings that you or a student you have parental responsibility for, or are a carer for, have provided to us for use in School activities
- CCTV images captured in school
- Other personal information relevant to your relationship with us (for example, if a hirer of a facility details of any insurance required; if a contractor/supplier details of the skills and experience, including any disclosure and barring service checks required, of those deployed as part of the contract in our School)
- Social media contact details if you contact us that way.

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data where this is necessary and relevant to our function to provide education to our students or to ensure we comply with our legal obligations to you. This includes information about (where applicable):

- Characteristics, such as ethnicity, languages spoken and eligibility for certain benefits;
- Any special or additional needs including any access requirements or reasonable adjustments
- Safeguarding and pastoral information, including professional involvement or court orders
- Medical and administration (including allergies, medication and dietary requirements)

We may also hold data about you that we have received from other organisations, including other schools and social services.

Why we collect and use this information

We use this data:

- to keep you informed about the running of the school (such as emergency closures) and matters relevant to your relationship with us (for example, for parents, keeping you informed about your child's progress;
- for contractors/suppliers, to enable you to deliver your agreed contract with us);
- to process payments for school services, facilities and clubs we provide to you;
- to process invoices and payments for services and goods you provide to us;
- to provide appropriate pastoral care and to promote and protect student welfare and wellbeing;
- to administer admissions waiting lists;
- to keep you informed of our activities and events relevant to the capacity in which you have a relationship with us;
- to comply with our obligations in law to you in the capacity in which you have a relationship with us, and to ensure the safety and wellbeing of our staff and students;
- to respond to and monitor any query or matter you have raised with us;
- to assess the quality of our School and Trust provision in all aspects, including delivering value for money; and
- to comply with the law regarding data sharing.

The lawful basis on which we use this information

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing student information are:

- for the purposes of bullet points 2-4, 7-9 and 10 above, in accordance with the legal basis of contract; collecting the data is necessary for the purposes of the contract or the intended contract;
- for the purposes of bullet points 1, 5, and 6-10 above, in accordance with the legal basis of Public task: collecting the data is necessary to perform tasks that schools are required to perform as part of their statutory function
- for the purposes of bullet point 5 in accordance with the legal basis of Vital interests: to keep children safe (food allergies, or medical conditions)
- for the purposes of bullet point 7 in accordance with the legal basis of legitimate interest where you do not have a statutory or contractual relationship with us and the other grounds for lawful processing above do not apply: the data is necessary for us to process in accordance with the capacity of the relationship you have with us.
- for the purposes of bullet point 10, in accordance with the legal basis of legal obligation in order to discharge our duties in law

In addition, concerning any special category data, with respect to ethnicity and fingerprint information or medical information: condition a: the data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except UK GDPR Article 9 paragraph 1 provides that the prohibition may not be lifted by the data subject.

Sometimes we may also use your personal information where you and your parents/carers have given us permission to use it in a certain way.

Some of the reasons listed above for collecting and using your personal data overlap, and there may be several grounds which justify our use of your data.

Collecting personal information

Whilst the majority of personal information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection law, we will inform you whether you are required to provide certain information to us or if you have a choice in this. Where we are using personal information only on the basis of your permission you may ask us to stop processing this personal information at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

Storing data

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our [Data Protection Policy](#) and you may also contact the School Data Protection Contact.

Who we share information with

We routinely share relevant student information (which we anonymise wherever possible) with:

- Bohunt Education Trust (as the legal entity we are a member academy of);
- Schools/colleges/employment providers that the students attend after leaving us;
- our local authority;
- the Department for Education (DfE) ;
- Our regulators – for example, Ofsted, ESFA;
- Our auditors;

- Suppliers and service providers;
- Police forces, courts, tribunals;
- Medical, educational, youth support and safeguarding professionals.

Why we share personal information

We only share personal information where it is necessary to do so: otherwise personal information is anonymised.

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Requesting access to personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for personal information, contact the School Data Protection Contact.

You also have the right to:

- to have your personal data rectified, if it is inaccurate or incomplete
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- to object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics
- not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you

If you have a concern about the way we are collecting or using personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact the Bohunt Education Trust Data Protection Officer.