

Data Protection Policy

Buckingham School of Setting Out Engineering Ltd (BSSE) is committed to ensuring the protection of the rights and freedoms of all individuals with respect to the personal data it holds about them, whether in their personal, family life, or in a business or professional capacity.

BSSE needs to collect and process personal data about individuals with whom it interacts in order to carry out its business and provide its services. Such individuals include, but are not limited to, trainees, employees (present, past, and prospective), suppliers, visitors, external verifiers, assessors, partners, stakeholders, and other business contacts.

The data may include identifiers such as names, addresses, email addresses, dates of birth, BSSE numbers, National Insurance Numbers, ID photos, and other personal identifiers. It may also include private and confidential information, as well as special categories of personal data.

Additionally, BSSE may occasionally be required to collect and use certain types of personal information to comply with legal requirements and the requirements of awarding bodies. Information can be collected in various ways and formats, including but not limited to, digital media, hardcopy, paper, or images (including CCTV). Regardless of the format, all information must be handled properly to ensure compliance with data protection legislation, specifically the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018).

Principles of Data Protection

Buckingham School of Setting Out Engineering fully supports and must be able to demonstrate compliance with the six principles of the Data Protection Act 2018 and the UK GDPR, which are summarised below:

Personal data shall be:

- a. processed lawfully, fairly, and in a transparent manner in relation to individuals;
- b. collected for specified, explicit, and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c. adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

There is stronger legal protection for more sensitive information, such as:

- race;
- ethnic background;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- genetic data;
- biometric data (where used for identification);
- health data;
- data concerning a person's sex life or sexual orientation.

These categories of data are referred to as "special category data" under the UK GDPR. Processing such data requires both a lawful basis under Article 6 of the UK GDPR and a separate condition for processing under Article 9.

Buckingham School of Setting Out Engineering ensures compliance with all six principles of the GDPR and the Data Protection Act 2018 by:

- following best practices in all personal data processing;
- adhering to the relevant processing conditions for the fair and lawful processing of personal data and special categories of personal data;
- informing individuals why we process their personal data and with whom it will be shared, through clear and effective privacy notices;
- ensuring that, when relying on consent from the data subject, it is freely given, specific, informed, and unambiguous;
- implementing "privacy by default" measures to ensure that, by default, we only process the personal data necessary for each specific business purpose;
- ensuring all staff and individuals working for Buckingham School of Setting Out Engineering complete the mandatory Data Protection e-learning course as part of their induction and any subsequent refresher training;
- ensuring the Records of Processing Activities (ROPA) are reviewed annually and kept up to date;
- maintaining a robust personal data breach detection, investigation, and internal reporting procedure;
- ensuring the transfer of personal data outside of the European Economic Area (EEA) is only carried out with a valid adequacy mechanism legitimising such a transfer;
- ensuring personal data is only retained for as long as necessary in accordance with the retention schedules.

Your Rights

Individuals have a range of rights with any organisation that holds personal data under the UK General Data Protection Regulation (UK GDPR). The rights are not absolute. Exemptions can be applied where appropriate.

All learners and employees of Buckingham School of Setting Out Engineering (BSSE) have the right to find out what information we store about them. These rights include the right to:

- be informed about how your data is being used;
- access your personal data;
- have incorrect data updated;
- have your data erased;
- stop or restrict the processing of your data;
- data portability (allowing you to obtain and reuse your data for different services);
- object to how your data is processed in certain circumstances.