



# DATA PROTECTION POLICY

2025 - 2027

<b>APPROVED/ENDORSED</b>	<b>30/03/2025</b>
<b>NEXT REVIEW</b>	<b>29/03/2027</b>

## **BCA POLICY STATEMENT**

This policy has been written by **BRITISH CAMPUS- ALGERIA**, and is committed to protecting the privacy and security of personal data, hence; it reflects our principles, responsibilities and our obligations- ‘Secure Your Data Today & Secure A Safer School Tomorrow’. We collect and continuously use staff, students, parents; as well as other stakeholders/partners personal information for the sole purpose of providing the highest educational standards and practices. Also, for legal matter, we comply with our statutory obligations, and with all legal entities nationally and internationally. This policy is intended to ensure that personal information is dealt with in a very secure and confidential way; and in accordance with 2018 Data Protection Act and the GDPR/General Data Protection Regulation. We use different ways in collecting our needed data for effective usage, and it will be destroyed when no longer needed for professional purposes. At BCA, we define personal information as data which related to individuals who can be identified through specific information/details.

### **AT BCA, WE DEFINE**

#### **PERSONAL DATA**

Different laws in different countries have indeed different definitions and interpretations; and here at BCA, we follow the Algerian rules. Personal data refers to any information relating to an identified or identifiable individual, and includes; but not limited to: Full name, passport details, title, role, work history, references, address, email, social media accounts, exams’ results, behavior records, academic transcripts, emergency numbers, attendance history....

#### **SENSITIVE DATA**

Sensitive data usually requires more protective measures, and must be handled with utmost care and confidentiality. It includes biometric data, ethnic background, health records, safeguarding matters, SEND/Special Educational Needs details and Disability, sexual orientation, religious beliefs....

#### **CRIMINAL RECORD DATA**

Laws and rules that define criminal offenses vary from country to country, and we at BCA follow and refer to the Algerian laws. BCA treats CRD in a very sensitive way, and it records criminal convictions, breaches or any related security matter. We define a criminal offense as an act that violates a law, regulation that is usually punishable by the Algerian government through different sanctions. Overall, criminal offenses are categorized in the following categories, and in Algeria; there might be slightly different:

-Felonies: Serious committed crimes and lead to heavy sentences or penalties. It includes drugs-dealing, homicides....

-Misdemeanors: Less severe offenses than felonies, and it results usually to fines, community services, probation.... It could include assault, theft.....

-Violations or infractions: They are usually minor offences, and it includes traffic tickets, littering....

## **DATA PROCESSING**

It refers to any activity that is conducted while using the personal data such as collecting, analyzing, recording, storing, organizing, retrieving...

## **DATA SUBJECT/S**

At BCA, it includes all our stakeholders (Current and ex-students, current or ex-parents, staff, Board of Governors, local private and public entities; as well as others (Visitors, guests, contractors...))

## **DATA PROTECTION OFFICER/DEPUTY**

At BCA, the Principal/Headmaster is the DPO, and the Head of the Secondary as his Deputy. He or She determines the legitimacy or the purpose of data usage.

## **DATA EXECUTIONER**

The Data Executioner is the staff member who processes that as instructed by the DPO/Deputy, and at BCA; the Secondary Head Deputy is in charge of this function

## **BCA POLICY PURPOSE, SCOPE & RATIONALE**

The purpose of this policy is to ensure that all of personal data that BCA collects is always dealt with utmost privacy, processed fairly; and we respect the rights of all those are included in our data storage. It applies to our students, staff, parents, Board of Governors, and all those who are associated with BCA (third parties). BCA collects and uses private data under the following legal bases:

- Consent
- Employment/Consultancy (Contract, advisory...)
- Legal commitments (International accreditation, inspections, government entities' requirements...)
- Legal interests (Admin, management...)

Despite that BCA promotes the British curriculum- Pearson, it is actually operating in Algiers- Algeria; where some aspects of this Data Protection Policy might not be applicable due to the local laws and governing entities. BCA strives to achieve its goals, while respecting and embracing data protection rights of all those who are either directly or indirectly working with us.

## **BCA- DATA PROTECTION POLICY PRINCIPLES**

BCA operates the strategy of 'Privacy by Design', which was established by GDPR/General Data Protection Regulation. It emphasizes on the role of integrating privacy consideration into the design and development of systems and technology to maximize the optimal data protection. Aspects of this approach includes:

- Privacy must be protected at every developmental stage
- Systems must be equipped with automatic protection's option
- Easy access to individual's data after request's approval
- Transparency, integrity and accountability should be part of data-handling best practices

BCA has also established, follows and enforces the following principals:

- **Lawfulness & Transparency:** We collect and use our data in a very straightforward and translucent way, by informing all parties beforehand, and must be within the legal frameworks
- **Specific Purpose and Objectives:** We collect data for very specific, clear and achievable purposes and goals only
- **Data Limitations:** We collect and store only the needed and necessary data, and must not be excessive in all cases
- **Accuracy & Validity:** We always make sure that we collect accurate, valid and updated data
- **Storage & Length:** We retain our collected and used data as long as necessary, for very specific amount of time, and whenever it meets our objectives
- **Utmost Privacy & Integrity:** We always make sure that our data is protected, kept secured, and safe from all unauthorized parties

To meet our principles and objectives, we are always committed to:

- Share our data with national and international legal entities and includes: Governments' entities (Ministry of Education, Employment...), international curricula board such as Pearson for accreditation purposes and exams, IT internal and external providers and departments
- Give access to individuals' personal data, when needed, and by emailing BCA Headmaster at: [principal@british-campus.com](mailto:principal@british-campus.com)
- Accept data portability, where applicable
- Formally request data updates, modifications, changes
- Always ask written and signed data release request/s
- Communicate and inform all parties the reasons for collecting, timing, and with whom
- Consistently cross-check the validity and accuracy of all the data that we collect and use
- Use it when needed and necessary only
- Destroy it, when it is not needed anymore; and in a very secure manner
- Ensure that both preventive and corrective measures are in place for the purposes of safeguarding, and protecting personal information from any external risk, theft or misuse
- Share the data only in professional and legal frameworks
- Set out clear procedures to assure full compliance
- Communicate and ensure that all BCA stakeholders read, understand and comply with all our procedures, guidelines and frameworks
- Store our data securely by using encryption and protected passwords
- Limit our data access only to authorized staff and legal entities based on evidenced request/s
- Store physical documents in secured areas and provide access only to authorized staff
- Train, coach, mentor, support and guide staff on data protection roles and responsibilities

## **BCA PERSONAL DATA COLLECTION & RECORDS**

- **Staff Records:** Includes both existing and former employees, and either expatriates or local hires. The list includes, but not limited to: Full name, nationality, address, DOB, medical results, contract details, housing details, emergency contact (In Algeria and overseas), next keen, CV...
- **Students:** All needed information for the admissions' purpose, and includes leaving certificate, vaccination card, academic records, ID or passport, written exams and interview/s results, attendance and behavior records, assessment, videos....
- **Parents and Guardians:** ID/Passport, financial details (bank, account...), address,
- **Board of Governors:** ID/Passports, Visa/s info, role/s, meetings' minutes, videos...
- **All Other Parties/Partners:** Includes visitors, BAC suppliers, government agencies such as Ministry of Education, Immigration, Ministry of Labor.... BCA requests all the necessary and relevant details/information to proceed with our partnership in different areas: Security, Maintenance, canteen...It includes, but not limited to ID/Passports, Log's records, purpose, activities....

All staff, students, parents and partners are aware that BCA runs a 24/24 CCTV system within all its premises, except for toilets. The main objectives of this system are as follows, but not limited to:

- Reinforce all stakeholders' security and safety
- Safeguard school's properties and facilities;
- Used as a great tool to conduct quick and efficient investigations whenever serious incidents happen
- Proctor official Pearson exams and make sure no serious misconducts, cheating...cased happen
- A great asset for BCA security team to better monitor all individuals and school's facilities during and after school's hours and weekends

## BCA STAKEHOLDERS/INDIVIDUALS RIGHTS

BCA personnel in general, and individuals in particular have full right to request about their data to the Headmaster, and in all the following cases/circumstances:

- Right to data mobility
- Right to personal data accessibility
- Right to add, delete or simply amend data
- Right to completely delete the data, subject to its legality within the country, region...
- Right to refuse or object data-sharing or processing

BCA reserves the right in sharing the data with governmental or authorized third parties such as travel agencies (Tickets' purchase), Ministry of Education (Teacher/leader approved license), Hospital (Employment medical tests), immigration (In-country residence), Ministry of Employment (Work-permit), Housing Department (Accommodation)...

## BCA POLICY LEADERS

BCA data protection policy team implements and monitors it, and are experienced educators with deep data protection and safeguarding experiences and expertise. They are as follows:

FULL NAME	ROLE
Mr. John. P. Brewer	Headmaster & Data protection Officer
Ms. Sandra Huskisson	Head of Secondary & Assistant Data Protection Officer
Mr. Zain Abbas Syed	Deputy-Head of Secondary & Policy Executioner

## PARENT/GUARDIAN DATA REQUEST

All official data access requests must be approved by BCA Data Protection Officer, who is the official Headmaster. Requests include access to CCTV in case of accidents, incidents..., photographs, videos, and online resources. There are some requests that are pre-approved by the Headmaster to parents at the beginning of the year; and there are others sensitive ones, who require prior approval/s before any action is taken.

See BCA Safeguarding and Child Protection Policy

## **DATA BREACH MANAGEMENT**

In case of a data breach, BCA has clear and easy procedures to follow, and they are as follows:

- Document/record the incident, while providing all the important information (Where, when, by who, what...)
- Urgently communicate with all and includes: Responsible data protection staff, affected individuals; as well as involved entities
- Fully investigate, while using an effective triangulation tool
- Share all findings, and take appropriate action/s
- Ensure all efficient steps to avoid future breaches or similar cases at all levels

## **COMPLAINTS/APPEAL**

BCA reserves the right of all individuals or groups to file complaints, if they feel their data has been breached; and in this case, we use our Complaints' Policy. Details of all complaints must be stated and includes: Nature of the issue, date of occurrence, impact, supporting evidence; and any individual has to request steps such as investigation/or further investigation, clear explanations how was the data handled, resolution/corrective options and levels and preventive measures

## **APPROVAL & REVIEW**

BCA is professionally committed to continuously protect, plan and execute this policy, ensure compliance from all BCA parties, and make positive changes; whenever necessary, as well as involving and engaging all relevant laws, governmental regulations or legislation. This policy will be reviewed and evaluated every two years, and within the frameworks of BCA. At BCA, we support the practice of conducting quarterly audits to evaluate the level of compliance, strengths, and identify areas for improvement. Once completed, then a feasible plan of action with fixed targets can be designed, implemented and monitored continuously.

This policy has been approved and endorsed by BCA leadership, and endorsed by BCA Board of Trustees. We highly expect all BCA stakeholders to adhere to its provisions, honor its terms, contribute to their utmost; work as a team; and make this policy a great success.