

Data Protection Policy

Brighton Evolving Education Hub Ltd ("Beehub") | Version: September 2026
To be read alongside the Beehub Terms and Conditions and Code of Conduct



1. Purpose

- 1.1 At Beehub we respect the privacy of the children attending our sessions, the privacy of their parents and carers, and the privacy of our staff. Our aim is to ensure that everyone using and working at Beehub can do so with confidence that their personal data is kept secure.
- 1.2 We comply with the UK General Data Protection Regulation and the Data Protection Act 2018 in obtaining, storing and using personal data.

2. Who is responsible

- 2.1 Our lead person for data protection is the General Manager, Ruth Lovegrove. The lead person ensures that Beehub meets the requirements of data protection law, liaises with statutory bodies where necessary, and responds to subject access requests.

3. Confidentiality

- 3.1 Within Beehub we respect confidentiality in the following ways:

- we only ever share information with a parent about their own child
- information given by parents to Beehub staff about their child is not passed to third parties without permission, unless there is a safeguarding issue, as covered in our Safeguarding Policy
- concerns or evidence relating to a child's safety are kept in a confidential file and are not shared within Beehub except with the Designated Safeguarding Lead and the Directors
- staff only discuss individual children for the purposes of planning and group management
- staff are made aware of the importance of confidentiality during their induction
- matters relating to the employment or engagement of staff, whether paid or voluntary, remain confidential to those making personnel decisions

- 3.2 Personal data is stored securely, in a lockable file where it is held on paper, and on a password protected computer or passcode-locked device where it is held electronically.

4. Information that we keep

- 4.1 **Children and parents.** We hold only the information necessary to provide our sessions for each child. This includes registration information, medical information, parent contact information, attendance records, and incident and accident records. Our lawful basis for processing this data is the performance of our contract with the child's parents. Our lawful condition for processing health-related information about a child is so that we can provide appropriate care to that child.
- 4.2 **Staff.** We keep information about staff in order to meet HMRC requirements and to comply with employment law. Our lawful basis for processing this data is compliance with our legal obligations. Our lawful condition for processing data relating to a member of staff's health is to meet the obligations of employment law.

5. How long we keep information

- 5.1 We keep personal data only for as long as we need it. Where a retention period is set by law, insurance requirements or regulatory guidance, we apply that period. The periods we currently apply are:

Records of a complaint	3 years from the conclusion of the complaint
Records of an exclusion	7 years from the date of the exclusion
Safeguarding and child protection records in line with BHSCP guidance	
Right to work checks	2 years after employment ends

- 5.2 Once a child leaves our care, or a member of staff leaves our employment, we retain only the data required by statutory legislation, insurance requirements and regulatory guidance, and only for the prescribed periods. Electronic data that is no longer required is deleted, and paper records are disposed of securely.

6. Sharing information with third parties

- 6.1 We only share information about a child with outside agencies on a need-to-know basis and with the consent of parents, except in cases relating to safeguarding children, criminal activity, or where we are required to share by a legally authorised body such as the police, HMRC, the local authority or Ofsted.
- 6.2 Where we decide to share information without parental consent, we record this in the child's file, clearly stating our reasons.
- 6.3 We only share relevant information that is accurate and up to date. Our primary commitment is to the safety and wellbeing of the children in our care.

7. Your rights and subject access requests

- 7.1 Parents and carers may ask to see the information and records relating to their child, and any information that we hold about themselves. Staff and volunteers may ask to see any information that we hold about them.
- 7.2 We make the requested information available as soon as practicable, and within one month at the latest.
- 7.3 Where our information is found to be incorrect or out of date, we update it promptly.
- 7.4 Parents and carers may ask us to delete data, but this may mean that we can no longer provide sessions for their child, as we have a legal obligation to keep certain records. Even after a child has left our care, we have to keep some data for the periods set out in section 5, so we will not always be able to delete everything immediately. The same applies to requests from staff and volunteers.

8. Photographs and images

- 8.1 Photographs are only taken of children where their parents have given consent. Consent is optional, is separate from a child's place with us, and may be withdrawn at any time by writing to contact@beehub.uk. Declining or withdrawing consent has no effect on a child's place.
- 8.2 Photographs are taken only on the Beehub device kept for that purpose, and never on a personal device. Parents must not photograph or film other people's children at Beehub events, and must not share images of other people's children online. Full details are set out in section 11 of our Code of Conduct.

9. Complaints

- 9.1 If you have a complaint about how we have kept your information secure, or about how we have responded to a subject access request, please raise it with us under our Complaints Policy in the first instance.
- 9.2 You may also complain to the Information Commissioner's Office at any time, at ico.org.uk or on 0303 123 1113.

10. Related policies

- 10.1 This policy should be read alongside our Safeguarding Policy, Code of Conduct, Complaints Policy, Exclusion Policy and Safe Recruitment Policy, all of which are published at beehub.uk.

Reviewed and updated by Tom Smith (Director) and Ruth Lovegrove (General Manager and Designated Safeguarding Lead). Version: September 2026. Next review: September 2027.

Brighton Evolving Education Hub Ltd is a company limited by guarantee, registered in England and Wales, company number 14900560. Registered office: 85 Church Road, Hove BN3 2BB. Sessions take place at One Church, Florence Road, Brighton.