Szkoła Przedmiotów Ojczystych im. Marii Skłodowskiej-Curie

DATA PROTECTION POLICY

Marie Skłodowska-Curie Polish Saturday School

Wimbledon-Putney • Registered Charity No. 1179554

Reviewed / updated	October 2026
Approval date	10.10.2026
Next review	October 2027
Review frequency	At least annually and after any serious incident or material change

1. Purpose and scope

This policy sets out how Marie Skłodowska-Curie Polish Saturday School (the Charity) manages personal information in accordance with the UK GDPR, the Data Protection Act 2018 and other applicable data-protection requirements. It applies to trustees, employees, volunteers and contractors who process personal information on behalf of the Charity.

2. Roles and accountability

- The Charity is the data controller for personal information where it determines the purposes and means of processing.
- The Board of Trustees has overall governance responsibility. Day-to-day responsibilities may be delegated, but accountability remains with the Charity.
- Anyone handling personal information for the School must follow this policy, relevant privacy notices, retention arrangements and security instructions.

3. Data-protection principles

- Process personal information lawfully, fairly and transparently.
- Collect it for specified, explicit and legitimate purposes and do not use it incompatibly with those purposes.
- Collect only information that is adequate, relevant and limited to what is necessary.
- Keep information accurate and update it where necessary.
- Keep identifiable information no longer than necessary.
- Protect information through appropriate technical and organisational security.
- Be able to demonstrate compliance with these principles.

4. Lawful bases and special-category information

The School will identify and document an appropriate lawful basis for each processing purpose. Consent is only one possible lawful basis and will not be used where another basis is more appropriate. Where special-category information is processed, the School will identify both an Article 6 lawful basis and an applicable Article 9 condition, and will meet any additional Data Protection Act 2018 requirements.

5. Children’s information

Children’s personal information requires particular care. The School will use clear, age-appropriate explanations where appropriate, limit access to those who need the information, and consider safeguarding obligations when deciding whether and how information should be shared.

6. Privacy information and transparency

The School will provide appropriate privacy information explaining what information is collected, why it is used, the lawful basis, relevant recipients, retention, international transfers where applicable, individual rights and how to contact the School or complain to the ICO. Privacy notices will be kept under review.

7. Data minimisation, accuracy and retention

- Forms and systems should request only information needed for a defined purpose.
- Reasonable steps will be taken to keep important personal information accurate.
- Personal information will be retained according to legal, safeguarding, financial and operational needs and securely deleted or anonymised when no longer required.

8. Access and security

- Access to personal information is limited according to role and need. Shared accounts should be avoided where individual accountability is required.
- Devices and accounts used for School information must use appropriate passwords/access controls and available security measures such as multi-factor authentication where proportionate.
- Paper records containing sensitive information must be stored securely and disposed of confidentially.
- Personal information must not be copied to personal devices, accounts or messaging services unless specifically authorised and appropriately protected.

9. Sharing information

Personal information may be shared where there is a lawful basis and the sharing is necessary and proportionate. Consent is not automatically required for every disclosure. Safeguarding information may be shared without consent where this is necessary to protect a child or another person, in accordance with applicable safeguarding and information-sharing guidance. Data-processing arrangements with suppliers must include appropriate contractual protections where required.

10. International transfers

Personal information must not be transferred or made accessible outside the UK in a way that constitutes a restricted transfer unless the School has identified a lawful transfer mechanism, such as applicable UK adequacy regulations or appropriate safeguards, and has completed any required assessment. The old rule that information may never leave the EEA without explicit consent is not the current UK GDPR test.

11. Individual rights

- The School will facilitate applicable rights, including rights of access, rectification, erasure, restriction, objection and data portability, and rights relating to certain automated decisions, subject to legal conditions and exemptions.
- Requests will be handled without undue delay and normally within the statutory time limit. Identity may be verified where necessary.

12. Personal data breaches

- A suspected loss, disclosure, cyber incident or other personal-data breach must be reported internally immediately so that it can be contained and assessed.
- Where a breach is likely to result in a risk to people's rights and freedoms, the School will notify the ICO without undue delay and, where feasible, within 72 hours of becoming aware of it. Where a high risk is likely, affected individuals will also be informed unless an exception applies.
- All material breaches and decisions about notification will be documented.

13. Data protection by design and new systems

Data-protection considerations should be built into new forms, systems, suppliers and projects from the outset. A Data Protection Impact Assessment will be completed where processing is likely to result in a high risk to individuals.

14. Photographs, video and communications

Use of photographs, recordings, websites, newsletters and social media must comply with safeguarding requirements as well as data-protection and copyright rules. The lawful basis and reasonable expectations of individuals must be considered; consent will be obtained where it is the appropriate basis.

15. Training, monitoring and concerns

People who regularly handle personal information will receive proportionate guidance or training. Data-protection concerns should be reported to the School promptly. Individuals may also complain to the Information Commissioner's Office.

16. Related documents

- Privacy Notice and Data Protection
- Safeguarding and Child Protection Policy
- Staff and Volunteers Code of Conduct
- Employment Procedure
- Intellectual Property Policy

17. Review

This policy will be reviewed at least annually and sooner following a material legal change, serious data incident or significant change to the School's systems or processing activities.

Official references

- Information Commissioner's Office – Guide to data protection: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/
- ICO – International transfers: https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/international-transfers/a-guide-to-international-transfers/
- Data Protection Act 2018: https://www.legislation.gov.uk/ukpga/2018/12/contents

18. Approval

Approved by: Board of Trustees, Marie Skłodowska-Curie Polish Saturday School

Approval date: As recorded in the Document Control table on the first page