



**SIAL.school**  
Bilingual English/Italian

## **Data Protection Policy**

**Last Reviewed March 2025**  
**Next review March 2026**

## 1. Introduction

SIAL collects, processes, and stores personal data relating to individuals such as pupils, parents, staff, suppliers, contractors, and directors. This policy outlines how we manage personal data in line with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

SIAL is the **data controller**, responsible for determining how and why personal data is used. This policy ensures that personal data is handled securely and lawfully.

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## 2. Purpose

This policy aims to ensure that SIAL:

- Complies fully with UK data protection legislation;
  - Protects the rights of staff, pupils, parents, and stakeholders;
  - Is transparent about how personal data is collected and used;
  - Mitigates risks related to data breaches.
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## 3. Scope

This policy applies to:

- All staff and volunteers;
- The board of directors;
- Contractors and third-party service providers;
- All departments and services handling personal data.

It applies to all personal data, regardless of whether it is stored electronically, on paper, or by other means.

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## 4. Principles of Data Processing

SIAL is committed to processing personal data in accordance with the following principles:

- Processed lawfully, fairly, and transparently;
  - Collected for specified, explicit, and legitimate purposes;
  - Adequate, relevant, and limited to what is necessary;
  - Accurate and kept up to date;
  - Retained only for as long as necessary;
  - Processed securely.
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## 5. Roles and Responsibilities

- **Board of Directors:** Oversees compliance and sets the organisation's data protection strategy.
  - **Data Protection Officer (DPO):** Ensures day-to-day compliance, provides training, handles subject access requests, and advises on data protection issues.
  - **Senior Leadership Team (SLT):** Ensures systems and practices meet security standards.
  - **All Staff:** Must follow this policy and report any data protection concerns to the DPO.
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## 6. Data Security

SIAL takes appropriate security measures to prevent unauthorised access, disclosure, or loss of personal data. This includes:

- Securing paper files in locked storage;
  - Using strong, regularly updated passwords;
  - Encrypting sensitive data;
  - Restricting access to personal data;
  - Backing up data regularly and storing it securely;
  - Prohibiting the storage of personal data on unsecured personal devices.
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## 7. Individual Rights

Under UK GDPR, individuals (data subjects) have the following rights:

- To access their personal data;
- To request rectification of inaccurate data;
- To request erasure ("the right to be forgotten");
- To restrict or object to processing;
- To data portability;
- To lodge complaints with the **Information Commissioner's Office (ICO)**.

Requests to access personal data should be emailed to the DPO at:

 [dpo@scuolaitalianalondra.org](mailto:dpo@scuolaitalianalondra.org)

Requests will normally be fulfilled within one month. SIAL may extend this timeframe or refuse a request only where legally justified.

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## 8. Data Breaches

SIAL will notify the **ICO within 72 hours** of any data breach likely to result in a risk to individuals' rights and freedoms. Affected individuals will also be informed when appropriate.

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**9. Data Sharing**

SIAL will not share personal data with third parties without a valid legal basis. In some cases, SIAL may be required to share data with law enforcement or other public authorities without consent, provided such requests are lawful and justified.

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**10. Training and Awareness**

All staff and volunteers will receive training on this policy and data protection best practices. New systems or procedures introduced at SIAL will include a data protection impact assessment where appropriate.

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**11. Privacy Notices**

SIAL is committed to being transparent about how personal data is used. Privacy notices are available on our website and provided at the point of data collection.

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**12. Encryption and Storage Guidelines**

SIAL has implemented internal encryption and IT security procedures that all staff must follow. Guidance is provided via internal training and the staff handbook.

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**13. Review and Monitoring**

This policy is reviewed annually or in response to significant changes in legislation, technology, or organisational practice.