



Deutsche Samstagsschule Brighton und Hove

German Saturday School Brighton & Hove Data Protection and Privacy Policy

Approved by Committee on: May 2026

Review due: May 2029

Data Controller: German Saturday School Brighton & Hove (DSSBH) Committee

Data Protection Contact: DSSBH Chair

1. Introduction

German Saturday School Brighton & Hove (DSSBH) collects and uses personal information about children, parents/carers, staff, volunteers, committee members and others in order to run the school safely and effectively.

We are committed to handling personal data lawfully, fairly and transparently, in line with the UK General Data Protection Regulation and the Data Protection Act 2018.

This policy explains what personal data we collect, why we collect it, how we store and share it, and the rights individuals have in relation to their data.

This policy applies to all personal data processed by or on behalf of DSSBH, whether in paper or electronic form. It should be read alongside DSSBH's Safeguarding and Child Protection Policy, Confidentiality & Information-Sharing Policy, Equal Opportunities Statement and any relevant behaviour, participation or parent conduct policies.

2. Who we are

For data protection purposes, the data controller is German Saturday School Brighton & Hove, represented by the DSSBH Committee.

For the purposes of this policy, references to the Committee mean the trustees responsible for managing DSSBH under the constitution.

The Committee is responsible for ensuring that DSSBH complies with data protection law. The Data Protection Contact can be approached with questions or concerns about how DSSBH handles personal data.

3. Whose data we process

We collect and process personal data about:

- children and young people who attend DSSBH;
- parents and carers;
- staff, volunteers, committee members and helpers;
- other individuals who interact with DSSBH, such as suppliers, visitors and guest teachers.

4. What data we collect and why

The exact data we hold will vary, but may include:

Children and young people

- name, date of birth, gender and language background;
- parent/carer contact details;
- class placement and attendance records;
- information about learning needs or additional support;
- medical or health information relevant to safety and wellbeing;
- emergency contact information;
- consent preferences, including photography;
- records of significant incidents or safeguarding concerns.

We collect this information to run classes safely, communicate with parents/carers, support children's learning and participation, manage health and safety, and meet safeguarding and legal obligations.

Parents and carers

- names and contact details;

- relationship to the child;
- payment records;
- communication preferences;
- relevant information about family circumstances where this affects the child's participation or safety.

We use this information to communicate about classes and events, manage enrolment and fees, and support children where needed.

Staff, volunteers, committee members and helpers

- names and contact details;
- roles and responsibilities;
- references and recruitment information;
- DBS information where required;
- records of training, safeguarding and relevant checks;
- payment records where applicable.

We use this information to manage staffing and volunteering, meet safer recruitment requirements, and fulfil legal and financial obligations.

5. Special category data

Some information we collect may be special category data, such as health or medical information, information about learning or developmental needs, or, in limited cases, information about religion or ethnicity where relevant to teaching, inclusion, safeguarding or pastoral care.

We only collect this information where necessary to protect a child's safety and wellbeing, make reasonable adjustments, provide appropriate support, or meet safeguarding and equalities responsibilities.

6. Lawful bases for processing

We process personal data under one or more lawful bases, including:

- legitimate interests, for example to organise classes, communicate with families, collect fees and manage DSSBH;
- contract, for example where we agree to provide teaching in exchange for fees;
- legal obligation, for example where we must keep financial, safeguarding or statutory records;
- vital interests, for example where information must be shared to protect someone's life or prevent serious harm;

- consent, for example for certain uses of photographs or specific communications.

Where we rely on consent, individuals can withdraw consent at any time. This will not affect processing already carried out before consent was withdrawn.

7. How we collect data

We collect personal data through registration and enrolment forms, emails, phone or written communications, attendance registers, class records, emergency or incident reports, DBS and reference checks, optional event or newsletter sign-ups, and consent forms for photographs or images.

We aim to collect only the data needed for the specific purpose.

8. How we store and protect data

We take appropriate technical and organisational measures to protect personal data from unauthorised access, loss or misuse.

This includes:

- storing paper records in locked cabinets or secure storage;
- storing electronic records on password-protected devices or secure cloud services;
- limiting access to those who need the information for their DSSBH role;
- using BCC for group emails to parents/carers;
- training staff and volunteers to handle personal data carefully;
- checking photograph consent before using images.

DSSBH will take particular care with information shared by email, WhatsApp, online forms, cloud storage and personal devices. Staff, volunteers and committee members should only access, store or share personal data where needed for their DSSBH role. Personal data should not be kept on personal devices for longer than necessary and should be securely deleted when no longer needed.

We do not sell personal data to third parties.

9. Sharing personal data

We may share personal data with third parties where this is necessary and lawful. Examples include:

- safeguarding and welfare: local authority children's services, police or other agencies where there are concerns about a child's safety or wellbeing;
- host school and venues: limited information necessary for health, safety, security and access to premises;
- service providers: accountants, banks, email or IT providers, where they process data on our behalf;
- regulators and authorities: HMRC, the ICO or other authorities where legally required;
- insurers or legal advisers: where needed for insurance, legal claims or risk management.

Where we share data with third parties who process data on our behalf, we aim to ensure that they have appropriate data protection measures and act only on our instructions.

We will not share personal data for marketing purposes without explicit consent.

Where a safeguarding concern arises, DSSBH's Safeguarding and Child Protection Policy and Confidentiality & Information-Sharing Policy will guide any information-sharing decisions.

10. Transfers outside the UK

Some IT or cloud service providers may store data on servers outside the UK.

Where this occurs, we will take reasonable steps to ensure that any international transfers comply with UK data protection law and that individuals' rights are adequately protected, for example by using providers with appropriate safeguards recognised under UK law.

11. How long we keep data

We will keep personal data only for as long as necessary for the purposes for which it was collected, or as required by law.

Indicative retention periods are:

- children's and parents' general records, including registration information and attendance records: normally up to 6 years after the child leaves DSSBH, unless there is a safeguarding, legal, insurance or dispute-related reason to keep them longer;
- safeguarding records: in line with safeguarding guidance and DSSBH's Safeguarding and Confidentiality policies;
- financial records, including fee payments and invoices: normally at least 6 years after the end of the financial year to which they relate;
- staff and volunteer records: for the duration of their involvement with DSSBH and for a reasonable period afterwards, particularly where needed for safeguarding, legal, insurance or governance reasons.

When records are no longer required, they will be disposed of securely, for example by shredding paper records and securely deleting electronic files.

12. Photographs and images

We may take photographs or videos of children and activities to celebrate children's achievements, create displays or teaching resources, and illustrate newsletters, website content or promotional materials for DSSBH.

We will:

- ask for photo/film consent on registration or through a separate form;
- respect parents'/carers' wishes where they do not consent;
- explain how images will be used and stored;
- check consent lists before using images;
- avoid naming children in publicly shared images where this is not necessary.

Parents/carers can change consent preferences at any time by contacting us. Withdrawal of consent will apply to future use. It may not always be possible to remove images already printed or widely distributed, but we will do so where reasonably practicable.

Parents and carers should not take or share photographs or videos of other children at DSSBH activities without appropriate permission. Concerns about images should be raised with the Committee.

13. Children's data and consent

In most cases, we rely on parents' or carers' information and consent to process personal data about children, particularly for enrolment, health information and photographs.

Where appropriate and safe, we will also explain to older children how their information is used and involve them in decisions about sharing information that directly affects them.

However, where there is concern that a child is at risk of harm, we may share information without the child's or parents' consent, in line with safeguarding and confidentiality procedures.

14. Your rights

Under data protection law, individuals have rights in relation to their personal data. Subject to certain conditions, these include:

- right of access;
- right to rectification;
- right to erasure;
- right to restriction of processing;
- right to object;
- right to withdraw consent where consent is the lawful basis.

Requests should be made to the Data Protection Contact. We may need to verify identity before responding. There is usually no fee, but we may charge a reasonable fee or refuse a request if it is manifestly unfounded or excessive, as permitted by law.

15. Questions, concerns and complaints

Questions or concerns about how DSSBH handles personal data should be raised with:

Data Protection Contact: DSSBH Chair

We will do our best to respond promptly and resolve concerns.

If you remain unhappy with how we have handled your personal data, you can complain to:

Information Commissioner's Office

Website: www.ico.org.uk

Telephone: 0303 123 1113

16. Review of this policy

This policy will be reviewed at least every three years, or earlier if:

- there are significant changes to data protection law or guidance;
- DSSBH's activities, systems, committee structure or host-school arrangements change in ways that affect how personal data is processed;
- an incident, complaint or concern suggests the policy should be reviewed sooner.