



Sherry Music Academy

UK REGISTERED CHARITY 1213504

Director: Sherry Shen, M.Ed, M.Perf

Registered Business Address: 1 Drive Mansions London SW6 5JB

DATA PROTECTION POLICY 2025

1. Legislation

To meet our obligations, we must put in place appropriate and effective measures to make sure we comply with data protection law. This policy provides a framework for ensuring that the Sherry Music Academy meets its obligations under the UK General Data Protection Regulation (UK GDPR) and associated Data Protection legislation including the Data Protection Act (DPA 2018). It applies to all the processing of personal data carried out by the Sherry Music Academy.

1.1 Guiding Principles

This policy aims to ensure compliance with data protection legislation, guided by the seven data protection principles that require:

1. Data shall be processed lawfully, fairly and in a transparent manner
2. Purpose limitation – data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
3. Data minimisation – data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
4. Accuracy – data shall be accurate and, where necessary, kept up to date
5. Storage limitation – data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed
6. Integrity and confidentiality (security) – data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
7. Accountability - the accountability principle¹ requires Sherry Music Academy to be able to evidence our compliance with the above six principles and make sure that we do not put individuals at risk because of processing their personal data.

1.2 Scope

This policy applies to all personal data and special categories of personal data processed by Sherry Music Academy and as defined under the UK General Data Protection Regulation (UK GDPR).

1.3 Target Audience

This policy sets out to staff, contractors and stakeholders, including third party suppliers, the approach the Sherry Music Academy will take to achieve and maintain data protection compliance.

1.4 Approval and Governance

All data protection documentation including Policies, Standards and Frameworks are owned by Sherry Music Academy

1.5 Contact

For any enquiries related to this policy document please contact Sherry Music Academy

2. Data Protection Policy

2.1 Policy Statements

2.1.1 Compliance with data protection principles

Sherry Music Academy implements appropriate technical and organisational measures in an effective manner to ensure compliance with data protection principles and UK GDPR compliance, Sherry Music Academy:

- Shall implement Privacy by Design¹ when processing personal data, we will ensure data protection risks are taken into account throughout the data lifecycle. This means assessing and implementing appropriate technical and organisational measures and procedures from the outset to ensure the processing complies with the law and protects the rights of the data subjects.
- Shall ensure that only personal data which are necessary for each specific purpose are processed.
- Shall ensure that only the minimum amount of personal data is collected and processed for a specific purpose
- Shall ensure the processing is limited to that necessary for each purpose
- Shall ensure the data is stored no longer than necessary and access is restricted to that necessary for each purpose. The legislation does not impose a strict limit on periods of retention for any data and acknowledges that personal data can be stored for longer periods for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. The decision on how long to retain data shall be based on the Sherry Music Academy retention policy
- Shall complete a full Data Protection Impact Assessment (DPIA) where processing presents a high risk to the rights and freedoms of data subjects. A DPIA screener shall be carried out for all new processing of personal data. If after the screener is assessed and processing is identified as high risk, a full DPIA shall be completed. If the full DPIA has a high level of residual risk or the processing is novel or contentious, the department will consult with the ICO.
- Shall integrate data protection into our policies, processes and procedures, in the way personal data is handled by us and by producing required documentation such as Privacy Notices, Records of Processing Activities (RoPA) and records of Personal Data Breaches
- Shall raise awareness, provide support and Training staff on how to comply with Data Protection Law and keeping a record of training completed
- Shall regularly test the privacy measures implemented and conduct periodic reviews and audits to assess compliance, including using results of testing to demonstrate compliance improvements

2.1.2 Data Subject Rights

Individuals have rights¹ in relation to the way we handle their personal data. These include:

- Right to be informed about the collection and use of personal data.
- Right to access and receive a copy of written or recorded (audio and video) personal data, and other supplementary information.
- Right to rectification to have inaccurate personal data rectified, or completed if it is incomplete
- Right to erasure of personal information in certain circumstances
- Right to restrict processing of personal data in certain circumstances
- Right to object to processing of personal data in certain circumstances
- Right to complain

The lawful basis for your processing can also affect which rights are available.

Sherry Music Academy reserves the right to take and use visual images publicly online or for commercial purposes of advertising and illustrating our educational services under the scope of the Act. Parents of children enrolled in the Academy are expected to consent for that specific use.

2.2 Roles & Responsibilities

The key roles involved in Sherry Music Academy's Data Protection are as follows:

Director Sherry Shen:

- Is primarily responsible for advising on and assessing our compliance with the DPA and UK GDPR and making recommendations to improve compliance.
- Owns the overall risk arising from the processing of personal data by the Sherry Music Academy.

- Accountable for the management of assets within Sherry Music Academy
- Accountable for managing access controls for accessing assets
- Ensuring all staff receive appropriate information management training for their role
- Responsible for issuing, reviewing and communicating corporate data protection guidance and procedures to Sherry Music Academy staff
- Responsible for issuing, reviewing and communicating corporate data protection training to Sherry Music Academy staff
- Responsible for compliance with a privacy by design approach consistent with data protection legislation
- Leads on Data Subject rights and ensuring transparency when dealing with data subjects

Sherry Music Academy Staff:

- Shall only have to access to personal data if they need it for their work
- Shall not share personal data without adherence to Sherry Music Academy's data sharing guidance
- Shall complete the mandatory training to help them understand their responsibilities when handling personal data and complying with data protection law
- Shall keep all personal data secure, by taking sensible precautions and following the departmental policies, standards and procedures