

Great Waldingfield Primary School PTFA

Data Protection and Privacy Policy

1. Introduction

The Data Protection Act 1998 (the “Act”) and the General Data Protection Regulations (the “GDPR” effective from 25 May 2018), regulate the way in which information about individuals connected with the Great Waldingfield Primary School PTFA (the “PTFA”) is collected, stored, used or transferred. Compliance with the Act and GDPR is mandatory.

The PTFA are committed to collecting and using such data fairly and in accordance with the requirements of the General Data Protection Regulations (GDPR), the regulations set by the European Union, and Data Protection Act 2018 (DPA 2018), the UK law that encompasses the GDPR.

This Privacy Notice applies to members, parents/guardians of children attending the school, volunteers, employees of the school, contractors, suppliers, supporters, donors and members of the public who will make contact with the PTFA.

The Data Controller for the PTFA is the Head of the PTFA. Being a small PTFA, there is no requirement to appoint a Data Protection Officer.

Members of the General Committee are responsible for ensuring that any data that is processed by the PTFA is processed in accordance with the Act and GDPR (the “Data Controllers”). At present all data is to be processed by members of the General Committee and so no agreements are in place with any external “Data Processors”.

This policy sets out how personal data is collected, stored or transmitted on behalf of the PTFA. Non-compliance could result in complaints, fines, adverse publicity and reputational damage.

The PTFA takes privacy extremely seriously. The PTFA will not share, sell, rent or lease your details to anyone else for marketing purposes. The PTFA will only ever use your information for charitable purposes, to keep you informed, allow you to support us and explain how your donations make a difference to our school.

If persons or organisations that choose to hear from the PTFA may be sent information based on their previous offers of assistance. This might be about volunteering for the PTFA, events, fundraising, appeals, admin or other charitable purposes.

All members of the General Committee must comply with the regulations when handling personal data and must attend any training session on Data Protection issues which the PTFA considers necessary.

Any member of the General Committee who considers that this policy has not been followed should contact the Head of the PTFA.

The PTFA take reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorised access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Information.

The PTFA complies with its obligations under the GDPR and the Act by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our Committee Members and adult volunteers and legitimate interest for personal data of our customers and supporters. Sensitive (special category) data for both Committee Members and adult volunteers will mostly align to the lawful basis of legitimate activities of the PTFA. Explicit consent is requested from parents/guardians to take photographs of children attending our school. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large-scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

The PTFA will use personal data for the following purposes:

- to provide information about meetings, activities, training courses and events to our members and other volunteers.
- to administer records
- to fundraise and promote the interests of the PTFA
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run by the PTFA
- to ensure and evidence your suitability if volunteering for a role in the PTFA
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct certifications, qualifications and skills.

The PTFA will use personal sensitive (special) data for the following purposes:

- for the protection of a person's health and safety whilst in the care of the PTFA
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting if required

The PTFA may share your personal information with others outside of the PTFA where it needs to meet a legal obligation. This may include its insurance subsidiary (Parentkind), local authority services and law enforcement. The PTFA will only share your personal information to the extent needed for those purposes.

The PTFA will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

The PTFA will never sell your personal information to any third party.

Where personal data is shared with third parties the PTFA will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and the Act.

2. General Responsibilities

Information Commissioner

The PTFA is not required to register with the Information Commissioners Office, as we:

- do not hold CCTV footage;
- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are members of the PTFA or have regular contact with it;
- only share the information with people and organisations necessary to carry out the PTFA's activities; and
- only keep the information while the individual is a member or supporter or as long as necessary for member / supporter administration.

Data Processing – The Guiding Principles

The Act / GDPR requires that personal data must be dealt with in accordance with certain principles.

These require that all Personal Data must be:

- processed fairly and lawfully;
- obtained correctly and in accordance with the PTFA needs;
- adequate, relevant and only as much as is required for the purposes of the PTFA;
- accurate, kept up to date and are erased or rectified without delay;
- kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes of the PTFA; and
- processed in a manner that ensures appropriate security of the personal data.

Basis for Processing Data

The PTFA processes data on the basis of "Legitimate Interest". In determining this basis, consideration has been given to the following three tests:

1. **Purpose test:** Data is only held to maintain contact details of those who have a relationship with the PTFA (e.g. parents who make payments to the PTFA (such as in relation to subscriptions or the 100 Club), and individuals / organisations related to the annual Summer, Winter and Spring Fayres).
2. **Necessary test:** The maintenance of the data allows reconciliations to be carried out in relation to payments received by, and paid out of, the PTFA. Data is held regarding adults and organisations only, never children.
3. **Balancing test:** All individuals and organisations have freely provided the information that is maintained by the PTFA.

Sharing/Transfer/Use of Data

Data from one function of the PTFA's operations may not be used in another and it may not be transferred to any other organisation or person. Only the people authorised by the General Committee to run that part of the PTFA may use the information held.

Holding of Data

Data may be held on committee member's individual computers and personal devices. However, all files which hold relevant data must be kept according to guidelines in the Appendix below, and must not be kept longer than necessary. The Trustees and Committee Members should be advised if any new data processing is due to take place, to ensure that it complies with the Data Protection Policy/Privacy Notice. There will be at least one review per year of data held by the PTFA. Paper records for events are used rather than relying on secure digital systems, as often events may be held where internet and digital access will not be available. The PTFA will minimise the use of paper to only what is required for an event or other service.

If the PTFA wish to use your personal data for a new purpose, not covered by this Data Protection/Privacy Notice, then the PTFA will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, the PTFA will seek your prior consent to the new processing.

Training Policy

All members of the General Committee who manage data are required to be trained as to Data Protection Policy. New members of the General Committee should receive data protection training to explain how they should handle and store personal data. Existing members should also be provided with refresher training on a regular basis. It is up to the Trustees to enforce this policy.

Public Access to Records

This Data Protection Policy will be kept on the PTFA's noticeboard within the school and available upon request. Access to and requests for changes to data records by individuals must be made in writing (including email) to the Head of the PTFA.

Your Rights

As a Data Subject, you have the right to object to how the PTFA process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information the PTFA use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk).

Unless subject to an exemption under the GDPR and the Act, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by the PTFA.
- The right to access your personal data – you can ask the PTFA to share with you the data we have about you. This is a Data Subject Access Request ("SAR"). Any such request made to the PTFA received in writing with your signature will be acknowledged and responded to within one month. If the PTFA cannot meet this deadline you will be given an explanation for the delay and a new timescale to respond to your SAR.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing.
- The right to erasure – this means that you have the right to request that the PTFA delete any personal data held about you. There are some exceptions, for example, some information will be held by the PTFA for legal reasons.

- The right to restrict processing – if you think that the PTFA are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask the PTFA share your data with you or others in a way that can be read digitally – such as a pdf. This makes it easier to share information with others.
- The right to object – you can object to the ways your data is being used.
- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by the PTFA.

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact the Head of the PTFA.

Password Security

All computer records which contain personal data must be protected by “strong” passwords, which must be at least 8 characters long and incorporate at least three of the following: uppercase letters, lowercase letters, symbols and numbers.

Currently, the following information is held by the PTFA:

Treasurer Records

The Treasurer keeps multiple records:

PTFA Accounts: This data is kept in paper (e.g. bank statements), Excel spreadsheets and Word documents.

PTFA Volunteer Records

The PTFA Head keeps names and email addresses of those people who have offered to help at events at the school where the PTFA is involved. This information is retained by the Head on personal devices/computer. Annual requests must be made to ensure retention of this information is applicable.

Secretary Records

The PTFA Head holds names and email addresses for members of the General Committee as well as any others who attend committee meetings and have requested minutes. These records need to be kept on the PTFA Heads email server for ease of email transfer and must not be used for any other purpose other than official business, unless the other party is a personal contact and consents to such use.

Summer, Spring and Winter Fayres, Disco Records

Records are normally kept for the last two years' events, as well as individuals who have expressly asked to be added to the mailing list for future events. This data includes Name, Company name where applicable contact name and an email address. Additional information such as a telephone number and postal address is recorded if given. This data will be deleted after two years; paper records will be destroyed by shredding one week after the event.

Event Records

Records are normally kept for the last two years' events, as well as individuals who have expressly asked to be added to the mailing list for future events. This data includes Name, Company name where applicable contact name and an email address. Additional information such as a telephone number and postal address is recorded if given. This data will be deleted after two years; paper records will be destroyed by shredding one week after the event.

Estate Agent Sponsorship

Records of parents and others who apply to have an estate agent board on their property advertising a Fayre (or other event that the PTA may organise), should be kept only by the Estate Agent Coordinator, and copied to the Head of the PTFA. Details include names, address including postcodes, telephone numbers and email address. Computer data should be deleted two years after it was first collected.