

PARK HILL PTA THORNS PTA

Data Protection Policy

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1. Aims

Park Hill PTA and Thorns PTA aim to ensure that all personal data collected is collected, stored and processed in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018).

This policy applies to all personal data, regardless of whether it is in paper or electronic format.

2. Legislation and guidance

This policy meets the requirements of the GDPR and the provisions of the DPA 2018. It is based on guidance published by the Information Commissioner's Office (ICO) on the GDPR and the ICO's code of practice for subject access requests.

3. Definitions

| Term | Definition |
|------------------------|---|
| Personal data | <p>Any information relating to an identified, or identifiable, individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none">• Name (including initials)• Class• Age• Gender• Dietary Needs |
| Processing | <p>Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.</p> <p>Processing can be automated or manual.</p> |
| Data subject | <p>The identified or identifiable individual whose personal data is held or processed.</p> |
| Data controller | <p>A person or organisation that determines the purposes and the means of processing of personal data.</p> |
| Data processor | <p>A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.</p> |

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| Personal data breach | A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data. |
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4. The data controller

Pak Hill PTA and Thorns PTA process personal data relating to parents, pupils, staff, governors, volunteers, visitors and others, and therefore are a data controller.

5. Roles and responsibilities

This policy applies to **all** volunteers undertaking fundraising activities for the PTAs.

5.1 PTA Committee

The respective PTA Committee has overall responsibility for ensuring that the respective PTA complies with all relevant data protection obligations.

5.2 Data Protection Officer

The data protection officer (DPO) is responsible for providing advice and guidance to the PTA in order to assist the PTA to implement this policy, monitor compliance with data protection law, and develop related policies and guidelines where applicable.

The DPO will carry out an annual audit of the PTA data processing activities and report to the PTA Committee their advice and recommendations on school data protection issues.

The DPO is also the first point of contact for individuals whose data the school processes.

Our DPO is Christopher Strelluf for Park Hill PTA and Claire Bound for Thorns PTA and is contactable via parkhilljuniorpta@gmail.com or thornspta@gmail.com.

5.3 All volunteers

All volunteers are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the PTA of any changes to their personal data, such as a change of contact details
- Contacting the designated Data Protection Officer in the following circumstances:
 - With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - If they have any concerns that this policy is not being followed
 - If they are unsure whether or not they have a lawful basis to use personal data in a particular way
 - If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the European Economic Area
 - If there has been a data breach
 - Whenever they are engaging in a new activity that may affect the privacy rights of individuals
 - If they need help with any contracts or sharing personal data with third parties

6. Data Protection Principles

The GDPR is based on data protection principles that our PTA must comply with.

Park Hill PTA and Thorns PTA have adopted the principles to underpin its Data Protection Policy:

The principles require that all personal data shall be:

- (1) processed lawfully, fairly and in a transparent manner ('lawfulness, fairness and transparency');
- (2) used for specified, explicit and legitimate purposes ('purpose limitation');
- (3) used in a way that is adequate, relevant and limited to what is necessary ('data minimisation');
- (4) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, are erased or rectified without delay ('accuracy');
- (5) kept no longer than is necessary ('storage limitation');
- (6) processed in a manner that ensures it is safe and secure, ensuring that measures against unauthorised or unlawful processing and against accidental loss, destruction or damage are in place ('integrity and confidentiality').

This policy sets out how Park Hill PTA and Thorns PTA aim to comply with these principles.

7. Collecting personal data

7.1 Lawfulness, fairness and transparency

Park Hill PTA and Thorns PTA shall only process personal data where:

- The data needs to be processed so that the PTA can **fulfil a contract** with the individual, or the individual has asked the PTA to take specific steps before entering into a contract
- The data needs to be processed to ensure the **vital interests** of the individual e.g. to protect someone's life
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**

7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so and seek consent where necessary.

Volunteers must only process personal data where it is necessary in order to do their jobs.

When volunteers no longer need the personal data they hold, they must ensure it is deleted or anonymised.

8. Sharing personal data

We will not normally share personal data with anyone else except those involved in organising a specific event.

9. Subject access requests and other rights of individuals

9.1 Subject access requests

Individuals have a right to make a 'subject access request' to gain access to personal information that the PTA holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this isn't possible, the criteria used to determine this period
- The source of the data, if not the individual

- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual

Subject access requests must be submitted in writing, either by letter or email to the Data Protection Officer. They should include:

- Name of individual
- Name of School
- Correspondence address
- Contact number and email address
- Details of the information requested

9.2 Responding to subject access requests

When responding to requests, we:

- May contact the individual via phone to confirm the request was made
- Will respond without delay and within 1 month of receipt of the request
- Will provide the information free of charge
- May tell the individual we will comply within 3 months of receipt of the request, where a request is complex or numerous, or where it is impractical to comply within a month due to school closure. We will inform the individual of this within 1 month, and explain why the extension is necessary

9.3 Other data protection rights of the individual

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it (see section 7), individuals also have the right to:

- Withdraw their consent to processing at any time, where processing is based on the consent of the pupil or parent
- Ask us to rectify, erase or restrict processing of their personal data, or object to the processing of it (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Prevent processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the DPO.

10. Photographs and videos

As part of our activities, the member of school staff present at each event may take photographs and record images of pupils where consent has already been given to the school for this purpose. These are the only images that would then be used in PTA and school newsletter when reporting on the events or on the PTA Facebook pages and noticeboards.

11. Data protection by design and default

The PTA shall put measures in place to show that it has integrated data protection into all of its data processing activities, including:

- Appointing a DPO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
- Maintaining records of our processing activities, including:
 - For the benefit of data subjects, making available the name and contact details of our PTA and DPO and all information we are required to share about how we use and process their personal data (via our privacy notices)

12. Data security and storage of records

The PTA will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data are kept under lock and key when not in use
- Papers containing confidential personal data must not be left anywhere there is general access
- Volunteers must ensure passwords are hard for anyone else to guess by incorporating numbers and mixed case into it.
- Volunteers who store personal information on their personal devices are expected to follow the same security procedures as above

13. Disposal of records

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, the PTA will shred or incinerate paper-based records, and overwrite or delete electronic files.

14. Personal data breaches

The PTA shall take all reasonable steps to ensure that there are no personal data breaches.

In the unlikely event of a suspected data breach, the DPO will record the breach, carry out a full investigation and take any necessary action.