



THE PRIORY SCHOOL PTA	DATE AGREED	NOVEMBER 2020
POLICY AND PROCEDURE STATEMENT	REVISION DATE	NOVEMBER 2021
 <h2 style="color: blue;">The Priory School PTA</h2> <p style="color: red;"><i>Help Us To Help The Children</i></p> 		
<h1 style="color: blue;">Data Protection / GDPR Policy</h1>		
CHAIR OF PTA COMMITTEE	BEN CANDY	
SECRETARY OF PTA COMMITTEE	SIMONE WHITE	
TREASURER OF PTA COMMITTEE	CARA ROGERS	
OTHER COMMITTEE MEMBERS	Amanda McCoy, Andrew Nagalewski, Alison Elmore, Clare Lissmann, Danielle Webster, David Cripps, Fiona Holroyde, Helen Johnson, Helen Nagalewski, Joanne Swali, Nikki Marianos, Sarah Dillow, Sarah Osment, Teri Heathcote.	

DATA PROTECTION / GDPR POLICY SEPTEMBER 2020

The aim of this policy is to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with the General Data Protection Regulation (EU) 2016/679 ('GDPR') and the Data Protection Act 2018 ('DPA 2018'). This policy addresses the requirements of the GDPR and the DPA 2018 and is based on guidance published by the Information Commissioner's Office (ICO). The GDPR is a regulation in EU law on data protection and privacy for all individuals within the European Union and replaces the Data Protection Act 1998.

This policy applies to all personal data, regardless of whether it is in paper or electronic format. Personal data is any information related to an identifiable living individual and includes their name, address, email address or other online usernames. Further definitions of terms used in this policy are included as an Appendix.

WHY DO THE PTA NEED A DATA PROTECTION POLICY?

The PTA are a data controller in respect of personal data related to parents, pupils, staff and other members of the community and therefore have an obligation to ensure the proper management of that data under GDPR. The PTA Data Protection Policy sets out how the PTA will manage personal information and explains that the PTA will:

- Only collect information that is needed for a specific purpose.

- Keep it secure.
- Ensure it is relevant and up to date.
- Only hold as much as is needed, and only for as long as it is needed.

Roles

This policy applies to all PTA committee members, and to external organisations or individuals who process personal on our behalf (data processors).

The **Data Protection Officer** (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the full committee and, where relevant, report to the committee with advice and recommendations on PTA data protection issues.

The DPO is also the first point of contact for individuals whose data the PTA processes, and for the ICO.

Full details of the DPO's responsibilities are:

Our DPO's are Mrs Cara Rogers (Treasurer) and Mr Ben Candy (Chairperson) work cooperatively in this role and are contactable via: prioryptatreasurer@gmail.com
ptapriory@gmail.com

Responsibilities

Committee members 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
- Contacting the DPO in relation to:
 - any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
 - 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.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how the PTA aims to comply with these principles.

WHAT LONG TERM INFORMATION WILL THE PTA REQUEST & WHY?

The PTA will request for communication and event analysis purposes only:

- A parent's name and e-mail address – in order to send communications.
- Child(ren)'s names and class(es) – in order for child/class/year group specific communication to be correctly directed or event tickets issued and post event to analyse the success per year group
- A parent's name and address - in order to provide support in promoting PTA events via our sponsors
- Consent to send:
 1. DIGITAL MARKETING
This includes all PTA fundraising activities, events, initiatives, encouraging attendance of events and volunteering. Examples of these include; non-school uniform days, discos, summer or Christmas fairs or purchasing promotions.
 2. SENDING INFORMATION TO 3rd PARTIES
This is only for the purposes of fundraising products and sponsorships, such as Christmas cards that the children design as they are sent to the printers and for supporting advertising of events through allowing advertising boards, provided by the sponsor, to be located at the parents' address.

WHAT SHORT TERM INFORMATION WILL THE PTA REQUEST TO SEND TO A 3RD PARTY & WHY?

The PTA may offer fundraising initiatives from a 3rd party that allows items to be ordered or places to be booked in return for the PTA receiving a donation. With these initiatives, parents if they wish to participate, will be required to complete an order or booking form, therefore giving permission for the PTA to pass their information to the 3rd party.

Typically, personal information requires will consist of a combination of the following:

- A parent's name contact details and signature – to confirm the order/ booking.
Allow the PTA or 3rd party, to get in contact with any queries.

- Child's name, class and school – in order for the items/ tickets to be passed on correctly.
- Address – for any items that require postal delivery.
- Allergy, dietary or medical information – for Health and Safety reasons.
- This information will be kept by the PTA for 2 weeks after the items have been issued or event taken place, in case of any matters that need following up.
- Base information of names / email contact details will be kept on file to keep PTA records accurately updated to ensure data accuracy, for up to 1 year, unless the contact opts out of this database collation for PTA purposes only

HOW IS THE INFORMATION STORED?

All paper forms will be kept in a lockable filing cabinet or lockable box file at the PTA Secretary's or Treasurers house.

Information that has been transferred to computer data or was obtained electronically will be kept in password protected files.

WHO HAS ACCESS TO THE INFORMATION?

Only PTA committee officers (Chair, Treasurer & Secretaries) are authorised to access the information. But on occasion it may be necessary to pass on the information to other committee members or Class Representatives. Reasons would include, but not limited to, distributing items to classes/children, confirming event attendance, when providing refreshments during events or ensuring our First Aider is aware of any existing medical or allergic conditions.

HOW WILL THE INFORMATION BE DISPOSED OF?

Once the information deadline has been reached, paper information will be processed for confidential shredding and computer files will be permanently deleted.

WHAT IF SOMEONE ELSE (including other parents) SENDS YOU INFORMATION ABOUT ME OR MY CHILD(REN)?

If we are passed any information by a 3rd party that was unauthorised, we will immediately get in touch with you to tell you what we have and why. If you inform us that we are not to have this information it will be destroyed immediately.

WHY CAN'T THE PTA ASK THE SCHOOL FOR THIS INFORMATION?

The PTA is a volunteer organisation, although we fundraise for The Priory Primary School, the PTA is a separate body and we are governed by the rules laid out in our constitution. Therefore, The Priory Primary School cannot share any personal information with the PTA without obtaining permission beforehand. The PTA are also not permitted to share information with the school without prior permission.

WHAT WILL NOT CHANGE?

We will continue to send information out via our Facebook page.

We have set up a private Facebook group, before you join the group you will be asked to agree to the Codes of conduct of the site - this also means you have opted-in to view posts in your news feed. We might make PTA related individual contact through Facebook but will never post or allow posts that post personal or identifiable information.

You can unlike/unfollow the page at any time.

“The Priory PTA” Facebook Group

You can still contact the school office to get in touch with us, as well as via e-mail:
ptapriory@gmail.com

What if I have questions?

If you have any questions regarding the
PTA Data Protection / GDPR Policy, you can get in touch by contacting us at:

ptapriory@gmail.com

TERM	DEFINITION
Personal data	<p>Any information relating to an identified, or identifiable, living individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"> ▪ Name (including initials) ▪ Identification number ▪ Location data ▪ Online identifier, such as a username <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>
Special categories of personal data	<p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none"> ▪ Racial or ethnic origin ▪ Political opinions ▪ Religious or philosophical beliefs ▪ Genetics ▪ Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes ▪ Health – physical or mental ▪ Sex life or sexual orientation
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>
Personal data breach	<p>A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.</p>