



'Spurring each other on with love'

PFA GDPR Policy

Introduction

This policy sets out the principles for how the Bickleigh Down Church of England Primary School PFA (the Association) will use personal data about individuals, including but not limited to: current, past or prospective PFA members and their children, sponsors, donors and third party companies such as stall holders.

This information is provided because Data Protection Law gives individuals rights to understand how their data is used. It relates in particular to anyone who receives personal details of other individuals in the course of their volunteer work for the Bickleigh Down Church of England Primary School PFA.

It is relevant to all within the association and is endorsed by the committee of Bickleigh Down Church of England Primary School PFA.

Responsibility for Data Protection

Requests and enquiries concerning the Association's uses of your personal data will be dealt with by the PFA secretary. Requests and enquiries should be sent to bickleighdownpfa@yahoo.com.

All PFA members and volunteers (such as event organisers and class representatives) will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

Why the PFA needs to process personal data?

In order to carry out its ordinary duties in supporting parents, teachers and children of Bickleigh Down Church of England Primary School, the PFA needs to process a wide range of personal data about individuals.

We use data to:

- Contact individuals for support, help or involvement at PFA events
- Inform individuals about and invite them to attend PFA events
- Compile a list of attendees and their relevant details for PFA events, where necessary this may include additional information such as relating to their year group, class, allergies, dietary requirements and special needs in order to safeguard children's welfare and provide

appropriate care, such as providing food appropriate to their dietary or medical needs at PFA events

- Offer photographs or video of their children to families (such as nativity photos)
- Update PFA members on PFA news
- Contact winners of raffles, auctions or similar competitions
- Contact sponsors, suppliers (such as stall holders at fayres), donors and local community groups and businesses for support or involvement at PFA events

Where specific consent is given, we may:

- Include photographs or videos to publicise the activities of the PFA or provide news of recent events on websites, digital communications or printed material.

All users are made in accordance with either consent obtained from individuals or the PFA's legitimate interests, or the legitimate interest of another and all data is only used for the specific purpose it is collected for.

How is your personal data collected?

Data relating to PFA members and their children is largely collected via written consent forms. Provision of this data is optional and the data provided can be viewed and managed by PFA members themselves at any time.

Data may also be collected via email correspondence, WhatsApp or text message correspondence, other online forms or printed forms, or on occasion, from the school where this is necessary and permitted in accordance with explicit consent or legitimate interest.

In the case of sponsors and suppliers, some information may also be collected from publicly available sources.

Types of Personal Data Processed

By way of example, data collected includes:

- Names, address, telephone numbers, e-mail addresses and other contact details;
- Childs names, gender, class name, year group and date of birth.
- Dietary requirements(for events where food is provided)
- Where appropriate, special needs, disabilities of individual children or adults attending PFA events
- Images or videos of children(and occasionally other individuals), for example, engaging in PTA activities

Where PFA events are chargeable or donations are made, these are provided in cash or via third party services such as PayPal or Gateway therefore the PFA do not hold bank details of its members.

Storage, Access, Handling and Sharing

Personal data is largely stored digitally – securely with regulations within WhatsApp.

Any physical data (such as printed copies of event participant lists or raffle ticket stuns) is kept securely in a lockable area with access strictly controlled and limited to those who are entitled to see it as part of their duties.

By way of example, access to data includes:

- If a PFA member permits contact via the PFA WhatsApp group, their name and contact number is visible to others within the same group
- Details provided for PFA events (such as a list of participants) are only accessible by relevant volunteers (such as the event organisers and class representatives) and PFA committee members
- Spreadsheets, form responses and other necessary data stored digitally or physically (such as contact details for stall holders) are only accessible to PFA committee members and volunteers on a need to know basis
- Where consent has been given, personal details (such as photographs or contact details for volunteers) may be shared with other PFA members (such as in newsletters) or publicly (such as images on the school website).

Where data is handled, this is limited to those who are required to see it, all of whom are bound by the confidentiality requirements. It is a criminal offence to pass on any of the data seen to anyone who is not entitled to see it.

We will do our best to ensure any data is held securely and will inform any relevant party should a data breach occur, in accordance with current legislation.

To support online security, we would recommend all PFA members ensure electronic devices have up to date security software installed and that passwords are not shared with others, changed regularly and not written down.

Retention and Deletion of Data

PFA members past and present are free to remove themselves from the WhatsApp groups and request their contact details be removed from PFA member's contacts lists and personal devices at any time. It is the responsibility of PFA members to keep their information on WhatsApp up to date.

The PFA will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. Some data is therefore only kept a few weeks, some data for the duration of a child's time at the school and some may be kept longer where a lawful reason remains.

By Way of example, this includes:

- Physical data relating to PFA events (such as printed list of participants) will be destroyed securely, typically within one month of the end of the event.
- Digital archive of past event will be kept longer, typically to the end of the academic year or until a repeat event is run to streamline administration.

- Photographs and videos taken on behalf of the PFA to share with individual parents (such as nativity photos) are deleted once the specified periods within which parents can acquire these photos has expired (typically 2 months).
- Photographs and videos taken for use (with consent) to share such as written newsletters or publicly the website, may be retained indefinitely (although consent can be withdrawn at any time).
- A record of consent relating to use of photographs and videos will be kept as long as the child remains at school or, beyond this, as long as an image relying on this consent is stored or used by the PFA.
- Data including but not restricted to contact details of third parties, raffle/auction prize recipients, lists of volunteers and their contact details will be retained for a longer term so long as there is an ongoing legitimate and lawful reason.

A limited and reasonable amount of information may be kept for archiving purposes.

When an individual requests we no longer keep in touch with them, we may need to keep a record of the fact in order to fulfil your wishes (called a “suppression record”).

Once the retention period has elapsed, we will ensure that any information is destroyed by secure means, e.g. by shredding, pulping or burning hard copies and full erasure of all electronic copies.

Information Disclosure and Withdrawing Consent

If you would like a copy of the information we hold on you please contact bickleighdownpfa@yahoo.com.

Where the PFA is relying on consent as a means to process personal data, any person may withdraw this consent at any time.

Compliance

If an individual believes that the PFA has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the PFA’s complaints procedure. You can also make a referral or lodge a complaint with the Information Commissioner’s Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the PFA before involving the regulator.

Changes to the Policy

The committee reserves the right to change its GDPR policy to maintain consistency with current best practice and the needs of the charity.

This policy will be reviewed annually by the Bickleigh Down Church of England Primary School PFA committee.

For the most up to date version of the policy, please request a copy by emailing bickleighdownpfa@yahoo.com or visiting the PFA section of the school website.

This policy was adopted on 28th February 2023.

Signed on behalf of Bickleigh Down Church of England Primary School PFA (Chairperson)

A handwritten signature in black ink, appearing to read 'Hannah Walsh', with a stylized, cursive script.

Hannah Walsh

This policy was reviewed as indicated below:

February 2023 created and approved.

Next review due February 2025.