

Data Protection Policy

Last updated	December 2019
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Definitions

Charity	means East Bergholt VC Primary School Parent and Teacher Association, a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	means Vasandhara Thoroughgood
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1. Data protection principles

The Charity is committed to processing data in accordance with its responsibilities under the GDPR.

Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. 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; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. 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."

2. General provisions

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Person shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity is exempt from registering with the Information Commissioner's Office due to the activities undertaken. If the scope of activities changes then this will be reviewed and a data protection fee paid

if necessary.

3. Lawful, fair and transparent processing

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. Lawful purposes

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the Charity's systems.

5. Data minimisation

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.

6. Accuracy

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.
- c. Trustee details will be checked and updated annually.

7. Archiving / removal

- a. To ensure that personal data is kept for no longer than necessary, each area in which personal data is processed will be reviewed annually in line with our Archiving Policy (Appendix 2) , with consideration given to what data should/must be retained, for how long, and why.
- b. Financial records will be kept for 6 years in line with Charity Commission guidance after which time any personal data will be destroyed.

8. Security

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept-up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. Breach

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

Appendix 1 : Register of systems 2019

How personal data is processed:

Purpose	Data (key elements)	Basis
Trustee details	Name, email, address, date of birth, telephone no.	Legal obligation - updating the Charity Commission register annually and then paper record of DOB and address is shredded. Names, email addresses and telephone numbers are kept electronically on the shared Dropbox folder, access for which is granted only to existing PFA trustees. Telephone numbers and email addresses are then saved on individual email accounts and mobile phones which are password protected.
PFA member details	Name, email, telephone no.	Legitimate interests - stored electronically for the purposes of organising PFA events.
Membership of 50:50 Club	Name, email, address, bank details	Contract – paper registration forms stored for financial records and details stored electronically for administering the draw
Making a donation	Name, email, address, payment information	Legitimate interests – stored electronically for administering the donation and claiming gift aid
Enquiries	Name, email	Legitimate interests – stored on password protected devices for responding to enquiries
Volunteer details	Name	Legitimate interests – paper record stored for duration of event and following event securely disposed of immediately
Pupil details	Name, class, carer telephone no.	Legitimate interests – paper record for disco for duration of event only/online record stored for processing Xmas cards

Appendix 2: Archiving Policy

In order to ensure that personal data is kept for no longer than necessary, and that access is restricted to those currently on the PFA committee, following the AGM each September, the new committee will review all areas in which personal data is processed and give consideration to what data is retained, for how long, and why. Specifically:

1. Access to Dropbox will be restricted to current Trustees.
2. A new WhatsApp group will be set up for the current Trustees
3. A new email list will be set up for the current Trustees.
4. Financial records older than 6 years will be destroyed.