 Registered Charity No. 1046227

**DATA PROTECTION POLICY**

|  |  |  |
| --- | --- | --- |
| **Version Control** | **Date** | **Comments** |
| Version 1.0 | 25 May 2018 |  |
|  |  |  |
|  |  |  |
|  |  |  |

1. **Background**

Willow Bank Infant School Association (WBISA) is a Registered Charity (No. 1046227) and an independent body to Willow Bank Infant School, run by the Trustees of the charity via an elected committee. More information on the governance of WBISA can be found in their constitution. The purpose of this policy is to detail WBISA’s compliance with the General Data Protection Regulation (GDPR) which came into law 25 May 2018.

The GDPR covers the accountability and transparency of processing of personal data such as:

* Names
* Email addresses
* Home addresses
* Phone numbers
* Medial history
* Dietary requirements
* Age
* Bank details

The GDPR is clear that the term ‘processing’ also refers to storage of this data, and that any processing of this data is covered under this law. The WBSIA Committee organise events and as such, need access to some personal data in order to manage those events. Appendix A (the Information Register) details the information held and will be reviewed annually at the AGM to confirm what information should be deleted or destroyed.

1. **What legal basis do we have for processing personal data?**

The GDPR lists the acceptable legal reasons for processing personal data. Of these, WBISA requires personal data under the following allowable reasons:

* 1. ‘Consent’ – the members of WBISA (parents/guardians of pupils attending WBIS) have consented to us using their data so we can inform them of our events. At any point, a person can withdraw consent for their data to be used and/or stored.
  2. ‘Contracts’ – when we run an event where we act as a ‘middleman’ (eg Christmas Cards, or any personalised products) we have the legitimate right to handle personal information to ensure orders are correct.
  3. ‘Legal obligation’ – the WBISA Chair has a legal obligation to inform the Charities Commission of the committee members’ details and is therefore allowed to process this information solely for this reason.

1. **Ensuring consent**

GDPR reiterates the four conditions that need to be present for consent from supporters of a non-profit to be valid:

* 1. Data must be freely given: The individual must consent without force, and they don’t have to give unnecessary details in order to donate or participate in an event.
  2. Data submission must be informed: Communication must be very clear with regard to what is being asked of them, and how they opt in or out.
  3. Data consent must be specific: An individual’s consent for one specific occasion can’t be applied to future instances, and can’t be changed later without further approval.
  4. Data consent must depend upon a positive action to indicate: An individual must tick a box, click “yes,” or complete a form to indicate consent. Absence of action isn’t allowed.

A ‘Suppressed consent’ log will be stored on the DropBox folder to ensure we have a record of who has opted out of receiving communications.

1. **Withdrawing consent**

A WBISA member can withdraw consent at any time, if they choose to do so, we would ask them to confirm in writing via [wbis.pta@hotmail.com](mailto:wbis.pta@hotmail.com) and add them to the ‘Suppressed consent’ log.

1. **Where we store personal data:**
   1. **Shared DropBox folder**

WBISA Committee members store information on a shared DropBox folder. Data such as door lists and volunteer lists may contain contact details of parents if this information is needed in order to run the event. Access to the WBISA is limited to only those committee members who require it (see Appendix C – Accountability Register).

Any files which are shared between committee members via email should be password protected.

* 1. **PTA Events Website**

WBISA use a website [www.pta-events.co.uk/willow-bank](http://www.pta-events.co.uk/willow-bank) to inform members of events and facilitate bookings and payments. In order to maintain compliance, all AGM and meeting minutes are published on the PTA website so that they are in the public domain ensuring all members of WBISA can see decisions of the committee.

When registering on the website, parents have to provide an email address, allowing the committee to contact them regarding events and any bookings or orders they make through the website. Parents may also enter their home addresses and home or mobile phone numbers should they wish, but this information is not required if they do not wish to share it. They are also able to select whether they are happy to receive marketing emails and can select or deselect this preference at any future point. PTA Events store all details on a secure database hosted in their London office, which is encrypted both at rest and in transit.

When parents sign up to the website, the fact that they are completing a form without force indicates they consent.

Access to the WBISA website is limited to only those committee members who require it (see Appendix C – Accountability Register).

* 1. **Email inboxes**

There are two email inboxes managed by WBISA: [wbis.pta@hotmail.com](mailto:wbis.pta@hotmail.com), which is used for general communication and [wbisa.treasurer@outlook.com](mailto:wbisa.treasurer@outlook.com) which is used for all finance activity (eg, PayPal payment notifications). Access to [wbis.pta@hotmail.com](mailto:wbis.pta@hotmail.com) is limited only to those committee members who monitor this inbox (see Appendix C – Accountability Register), while only the WBISA Treasurer has access to [wbisa.treasurer@outlook.com](mailto:wbisa.treasurer@outlook.com).

* 1. **Facebook page**

A ‘closed’ Facebook group is used to communicate information to parents and carers about upcoming events. Some committee members act as administrators of this group (see Appendix C – Accountability Register).

It is vital that all member requests to this group are verified. If the individual requesting access is not known to the committee, they should be contacted and asked a question such as “who is your little one’s teacher?” or a similar question which cannot be answered simply using information in the public domain. Once approved, they need to be informed that they cannot post or comment about any other individuals without their prior consent.

In addition, all communication in this group should be monitored by the administrators to ensure no personal data is used without permission (eg, no one is mentioned by name, or details posted).

* 1. **WBISA Accounts folder**

The WBISA Treasurer retains a hard copy record of all income and expenditure in compliance with standard accounting practice. This includes any expenses incurred by committee members and their bank details for online payments. The Treasurer will ensure that all bank details are redacted before handing this folder onto anyone else (eg, the Independent Examiner who reviews the accounts annually, or the incoming Treasurer).

* 1. **Any written records**

Anything written down (such as a door list or even phone number or email address onto a post-it note) may contain personal data. If any door or volunteer lists are printed out to be used at an event, it is recommended that emails and phone numbers are removed unless absolute necessary to the running of the event. At each event, one committee member should be responsible for any such lists, ensure it is not left lying around, and that it is securely destroyed after the event.

Other written records include forms completed by parents who have paid with cash or a cheque via the safe (rather than online via the website). These forms should include the phrase “we need this information so we can contact you if there is a query with your order” and any completed forms should be destroyed as soon as they are no longer needed.

1. **Deletion policy**

Data should only be kept for the length of time it is required. It is recommended that all contact information held within door lists and order lists are deleted or destroyed within 3 months of the event, or by the end of the academic year. The door list itself can be retained in order to confirm who attended which event.

1. **Annual review**

While data will be deleted or destroyed once it is no longer required throughout the year, an annual review will be conducted prior to the AGM (see Appendix B – Annual Checklist). This will include:

* 1. Updating the Information Register (Appendix A) and reporting at the AGM that this has been complete.
  2. Reviewing access requirements for emails/website/DropBox folder etc.
  3. Ensuring this policy remains current and fit for purpose.

Once a committee member leaves the committee, they should return any records, or confirm they have been deleted or destroyed.

1. **What to do if a data breach occurs**

Examples of a data breech could include:

* Losing a print out of a door or volunteer list containing contact details.
* Posting information about someone on Facebook or the website without that person’s permission.
* Sending an email to a group of people where email addresses are not hidden and others can see those emails.

In the instance of a data breech, the WBISA Chair (or delegate) should report the data breech to the ICO within 72 hours of a committee member being aware of it. For more information visit **ico.org.uk**.

**Appendix A – Information Register**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Type of Information** | **Purpose of processing1** | **Lawful basis for processing2** | **Legitimate interest assessment3** | **Retention** | **Who needs access?** | **Where it is stored** |
| Door lists for events (which may be a list of names, but may also contain contact details of attendees if it is necessary for the event) | Ensuring entry to event | Contract |  | If contact details are stored on the door list, they should be deleted after the event and any hard copies should be destroyed | PTA team on the door to event | DropBox folder |
| Volunteer rota list for events | Having a record of who is helping and in what capacity at each event | Contract |  | If contact details are stored on the volunteer rota, they should be deleted after the event and any hard copies should be destroyed | PTA team organising each event | DropBox folder |
| Hard copy forms | Members who pay for entry to our events via the safe in Reception complete a form | Contract |  | Any hard copy forms should be destroyed after the event | PTA team organising each event | At organisers home |
| Email addresses and contact details of users of our website | Correspondence | Consent |  | Users can remove themselves, or request to be removed once they no longer need access. If they have not logged in for 2 years, then their account will be deleted. | PTA team who have access to website | PTA Events website |
| Email addresses and possibly contact details of anyone who has emailed either of our inboxes | Correspondence | Consent |  |  | PTA team who have access to our email inboxes | Email inboxes |
| Trustees personal information (full name, address and Date of Birth) | Our committee members act as Trustees to our charity. | Legal obligation |  | Any emails/written records of this information should be deleted or destroyed after passing onto The Charities Commission | Chair (or delegate) | This information is passed onto The Charities Commission |
| Committee member bank account details | For paying expenses via BACS (payment can also be made by cheque, depending on the person’s preference) | Consent |  | Before passing on the accounts (to the Independent Examiner, or incoming Treasurer), any bank account details should be redacted. | Signatories to the bank account | The Treasurer may have this information as a hard copy on expense claims forms. |
|  |  |  |  |  |  |  |

**Notes:**

1 – Each different purpose of processing should be on a separate line

2 – Lawful basis should relate specifically to the purpose and therefore there may be a number of lawful bases for processing the same piece of information

3 – Only required where lawful basis for processing is legitimate interests.

**Appendix B – Annual checklist**

* Ensure Data Protection Review is included as an agenda item at the AGM
* Review Data Protection Policy to check if there have been any changes to data processing in past year
* Update Information Register
* Ensure any data is deleted or destroyed if no longer required
* Update Accountability Register once new committee members have been confirmed
* Ask outgoing committee members to return any documents/ delete anything from their laptops etc and remove their access to folders and websites
* Change passwords if necessary
* Remove anyone who is no longer a parent at the school from the ‘supressed consent’ log
* Treasurer to redact bank account details on expense forms

**Appendix C – Accountability Register [A completed version is kept on our DropBox folder]**

|  |  |  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- | --- | --- |
| **Name** | **Committee role** | **Access to** [**wbis.pta@hotmail.com**](mailto:wbis.pta@hotmail.com) | **Access to** [**wbisa.treasurer@outlook.com**](mailto:wbisa.treasurer@outlook.com) | **PTA Events website administrator** | **Access to WBISA DropBox folders** | **Facebook group Administrator** | **Signature** | **Date** |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |
|  |  |  |  |  |  |  |  |  |