



Data Protection Policy

Version January 2022

Data protection is the fair and proper use of information about people. This policy is to support Aldryngton PTA's compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

What is Personal Data:

In short, personal data means information about a particular living individual e.g. names, email address. This might be anyone, including a parent, pupil, member of school staff or member of the public.

Personal data only includes information relating to natural persons who:

- can be identified or who are identifiable, directly from the information in question; or
- who can be indirectly identified from that information in combination with other information

It doesn't need to be 'private' information – even information which is public knowledge or is about someone's professional life can be personal data.

It doesn't cover truly anonymous information – but if you could still identify someone from the details, or by combining it with other information, it will still count as personal data.

It only includes paper records if you plan to put them on a computer (or other digital device) or file them in an organised way. So, the names on the sign-up sheets for pool club CPR training attendance which are filed for reference will be personal data, but names on raffle tickets which will be disposed of after the draw won't be.

What is controlling and processing personal data:

The PTA is classed as a "controller" of personal data if it decides to collect or process (i.e. collect, handle and store) the personal data, decides what the purpose or outcome of the processing was to be, what personal data should be collected and from whom. Controllers are responsible for the personal data.

Children's personal data:

Children need particular protection when collecting and processing their personal data because they may be less aware of the risks involved. For children under the age of 13, only whoever holds parental responsibility for the child is able to give consent for the processing of their person data.

In addition to data protection requirements, also consider safeguarding issues around collecting and disclosing children's full names and details.

Key Principles:

1. **Only collect, use and store data that is absolutely necessary** for the purpose you are collecting it for. For example, collect postal addresses if you want to claim Gift Aid for donations, but not email addresses or phone numbers as well, if you don't actually need to contact the individuals. When collecting children's details in particular, consider whether you need to collect their whole name or whether the first name is sufficient. Ask for their age or their year group or even just which area of the school they are in (FS, LS, US or US), rather than their date of birth. Since the school already holds data on pupils and parents, consider whether you can use the school's systems e.g. use ParentMail to issue information rather than creating a separate email list.
2. **Do not collect, use and store sensitive personal data** e.g. on health, religious belief, sexual orientation, political opinion, racial/ethnic origin.
3. **Be clear on the reason** under which you are collecting, using and storing the data. Typically, these would be:
 - "legitimate interest" i.e., there is a good reason to collect and handle this data for a specific purpose e.g. names of attendees for training stipulated by the PTA or contact details of officers needed for charity commission submissions or;
 - "consent" i.e. where the person whose data is collected and stored has explicitly agreed for this to happen. Note that consent to store data can be withdrawn at any time.
4. **Make sure data collected and stored is accurate.** Ideally ask individuals or their parent/guardian to complete information directly. Correct errors as soon as possible.
5. **Be mindful how many people can see personal data** and think of options to limit this e.g. using initials on sign-up sheets if the organiser knows who the individuals are, using forms to collect information rather than entering lines in shared spreadsheets.
6. **Only share personal data with third parties** if you have consent to do so from the individuals.
7. **Delete data as soon as it's no longer required** for the purpose for which it was collected e.g. delete the volunteer sign-up sheet once the event is over. You should not re-use contact details collected for one purpose e.g. to email tickets for another e.g. to contact people to tell them about a PTA meeting, unless it was clear that you would re-use the data in this way when you collected it.

Subject access requests: Requests for copies of personal data held by the PTA about an individual should be addressed to the PTA officers. These requests must be responded to within 28 days.

Further guidance: Is available on the Information Commissioner's Website <https://ico.org.uk/>