



Friends of Swindon Village Primary School

Data Protection Policy and Procedures

Date approved: 27th February 2019

Date of next review: 31st March 2020

Introduction

The Friends of Swindon Village Primary School (referred to as 'the Friends') is committed to protecting the rights and privacy of individuals. The Friends need to collect and use certain types of Data in order to raise funds to benefit the education of pupils at Swindon Village Primary School. This policy explains how we will make sure that personal information is collected and dealt with appropriately.

The Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR) govern the use of information about people (personal data). Personal data can be held on computer or in a manual file and is any information relating to an identifiable person who can be directly or indirectly identified in particular by reference to an identifier.

The Friends is the Data Controller for the information it holds. The Trustees and committee members will be personally responsible for processing and using personal information in accordance with the Data Protection Act and their individual documented responsibilities.

Trustees and committee members who have access to personal information will be made aware that they must read and comply with this policy.

Purpose

The purpose of this policy is to set out the Friends procedures for protecting personal data. The Friends regards the lawful and correct treatment of personal data as very important to successful working, and to maintaining the confidence of those with whom we deal with.

When processing personal data we will:

1. be transparent about asking for personal data and clearly seek consent when we ask for personal data,
2. process personal data fairly, lawfully and only when specific conditions are met,
3. only collect personal data for lawful purposes: we shall not process personal data in a manner that is incompatible with that purpose or those purposes,
4. make sure that we only hold the data that we need, and that we hold it only for as long as we need it and no longer.
5. make sure that the data that we hold is accurate and, where necessary, kept up to date,
6. provide access to the personal data that we hold on an individual if they request it,
7. allow someone to correct the data that we hold about them if they ask, or to stop us using their data for a specific purpose,
8. safeguard the data that we hold.

Responsibilities

The Friends does not have a named individual acting as the Data Controller: the Friends is a small charity with minimal information holdings and no dedicated ICT. Rather the Trustees and Committee will take into account legal requirements and ensure that through appropriate management, strict application of criteria and controls:

- We fully observe conditions regarding the fair collection and use of information,
- We meet our legal obligations to specify the purposes for which information is used,
- We collect and process appropriate information, and only to the extent that it is needed to fulfil our operational needs or to comply with any legal requirements,
- We make sure that – where necessary – we keep the information we use up to date,
- We make sure that the rights of people about whom information is held, can be fully exercised. These include:
 - The right to be informed that processing is being undertaken
 - The right of access to one's personal information
 - The right to prevent processing in certain circumstances and
 - The right to correct, rectify, block or erase information which is regarded as wrong information
- Take appropriate technical and procedural measures to safeguard personal information,
- Ensure that personal information is not transferred to other organizations without suitable safeguards,
- Set out clear procedures for responding to requests for information

The Trustees will be responsible for ensuring that this policy is implemented and will have overall responsibility for making sure that:

- Individual Trustee or Committee member responsibilities regarding personal data relating to specific events are clearly agreed and recorded.
- Everyone processing personal information understands that they are responsible for following good data protection practice.
- Everyone processing personal information is appropriately trained to do so.
- Everyone processing personal information is appropriately supervised.
- Anybody wanting to make enquiries about handling personal information knows what to do.
- The Friends deal promptly and courteously with any enquiries about handling personal information.
- The Friends clearly describe how we handle personal information.

- The ways in which the Friends holds, manages and uses personal information are regularly reviewed, and that the methods used are regularly assessed.
- That all Trustees, Committee members and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to action being taken against them.

This policy will be updated as necessary to reflect best practice in data management, security and control and to ensure compliance with any changes or amendments made to UK law.

In case of any queries or questions in relation to this policy please contact the Friends via 'chairfosvps@gmail.com'.

Data collection

Informed consent

Informed consent is when the individual providing their personal data to the Friends clearly understands why their information is needed, who it will be shared with, the possible consequences of them agreeing or refusing the proposed use of the data and – using this understanding - explicitly gives their consent.

When collecting data, the Friends will ensure that the individual providing their personal data:

- Clearly understands why the information is needed.
- Understands what it will be used for and what the consequences are should they decide not to give consent to the Friends processing of their data.
- As far as reasonably possible, grants explicit consent, either written or verbal for data to be processed.
- Is, as far as reasonably practicable, competent enough to give consent and has given so freely without any duress.
- Has received sufficient information on why their data is needed and how it will be used.

Data Storage

Information and records held by the Friends will be stored securely and will only be accessible to authorised Trustees or Committee members.

Information will be stored for only as long as it is needed and will be disposed of appropriately. For hardcopy data this will be by secure destruction. Softcopy data will be deleted.

Access to service accounts used by the Friends (Facebook, email, Dropbox) will be limited to named Trustees or Committee members. The Friends will use and rely on the security features of the services that they use.

It is the responsibility of the individual Trustee or Committee member to ensure any personal data held by the Friends is non-recoverable from any personal device that they use to undertake Friends business. Where that device is shared it is the individuals' responsibility to ensure that no other users of that device can access personal data held by the Friends.

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Risk Management

The consequences of data breaches can cause harm or distress to the individual if their information is released to inappropriate people. Trustees, Committee members and volunteers should be aware that they can be personally liable if they use personal data inappropriately. This policy is designed to minimise the risks and to ensure that the reputation of the Friends is not damaged through inappropriate or unauthorised access and sharing.

Further information

If someone has a specific question about data protection in relation to the Friends then they should email 'chairfosvps@gmail.com'.