

Guidance for use of Personal Data held by the Friends of Maple Infants.

The Friends of Maple Infants (***The Friends***) is a registered charity that exists to support and enrich the educational experiences of pupils at Maple Infants' School. The Friends also aims to assist with the production of a sense of community amongst its members via a social media platform and through the organisation of social events. We collect and use the personal data of members to assist us in fulfilling our objectives. The use of Personal Data is governed by the GDPR; the following guidance, alongside The Friends Privacy Notice, will ensure that The Friends complies. The Friends understands the importance of ensuring good data protection procedures are adhered to at all times.

Personal Data is that data collected from ordinary members by which they can be identified.

The Friends will collect Personal Data about its **Ordinary Members** who are:

- Parents or carers of child(ren) attending Maple Infants School
- All staff members at Maple Infants School
- An individual over 18 years of age, who is not a parent or carer of a child attending Maple Infants, whose membership is agreed by the current Committee.

Ordinary Members may also assume additional roles:

- **Class Representative** – ordinary members with additional voluntary responsibilities for organising activities within a class
- **Volunteer Helpers** - ordinary members who volunteer to complete particular tasks or contribute particular skills
- **Sub-Committee Members** – unelected ordinary members with responsibilities for a particular event or function
- **Committee Members** – elected members with additional responsibilities for the organisation as a whole.

The personal data of Friends members is collected and processed on the legal basis of **Consent** as defined by Article 6 of the GDPR. No sensitive data will be collected as defined by Article 9. Members will be asked to provide their consent to the collection of personal data as necessary.

- The personal data held by The Friends or Classlist is processed for the purposes of fulfilling The Friends charitable functions. Such purposes include:
 - To maintain membership records
 - To confirm ordinary membership status with Maple Infants School
 - To manage The Friends website and Classlist platform
 - To inform members of The Friends activities
 - To fundraise and promote the interests of the charity
 - To manage events we run
 - To engage with members with regards to The Friends charitable aims, activities and expenditures
 - To maintain The Friends accounts and records

- To fulfil any reporting obligations for charities to HMRC and the Charity Commission
- To claim Gift Aid on eligible donations from HMRC
- The Friends also fulfils a social aspect with regards to its members. Personal Data collected should not be shared by members for any reason other than Friends business without specific consent by an individual. eg the telephone number of a mum in Oak who is selling a pram can't be taken from Classlist without permission and passed to a next door neighbour who wishes to buy a pram.

Data Controller – The Friends is the Data Controller of members' Personal Data.

Data Processing – The Friends currently uses **Classlist**, a PTA specific Web-based social media platform, as the Data Processor of members' personal data. Classlist will be used to facilitate the majority of regular communication between members. The Classlist privacy notice which members will agree to when registering with the platform can be viewed at

https://drive.google.com/file/d/1TUq8hM6bfb50RIGOXARN_6CHPWZ7pW24/view

The Friends will act as a Data Processor for member or third party data which falls outside the scope of, or is extracted from, the Classlist platform. Examples of this will include but not be limited to:

- Guest lists for specific fundraising events.
- Details of Third Parties collaborated with to allow fundraising activities to occur.
- Archiving of Committee member contact details for the purposes of managing the charities responsibilities.

When processing personal data outside of the Classlist platform The Friends complies with its obligations under the GDPR by:

- Keeping personal data up to date –
 - Data will be regularly audited; this is the responsibility of the Secretary.
 - Members can notify The Friends if their personal data requires updating.
 - By liaising with Maple Infants School with respect to leavers and new starters.
 - By keeping personal data for no longer than is necessary. Data will be deleted or archived in accordance with GDPR requirements.
 - The Friends will keep personal data as follows:
 - Event specific personal data - deleted within 28 days of the event.
 - Prize / Auction related personal data - deleted within 28 days of the subject receiving the prize or paying for the auctioned item.
 - Ordinary member data held for any other reason will be deleted within 3 months of the member resigning their membership (automatic resignation occurs when the relevant child leaves Maple Infants School).

- Additional personal data relating to the post of Class representative or Volunteer helper will be deleted within 3 months of the individual resigning this position.
- Committee member data will be archived within 3 months and deleted within 3 years of the individual resigning this position. The extended period will allow The Friends to fulfil its obligations as a registered charity.
- Sub-committee member data will normally be deleted within 3 months of the individual resigning this position. However data will be archived within 3 months and deleted within 3 years if the member is considered to have acted in such a way that their details may be needed with regard to management or monitoring of the charity.
- Completed Gift Aid Declaration forms will be kept for 6 years after the first eligible donation, or for as long as is required to comply with our reporting obligations to HMRC.
- Not collecting or retaining excessive amounts of data as well as storing and destroying it securely. Protecting personal data from loss, misuse, unauthorised access and disclosure.
 - Data not held on an IT system (ie paperwork) will be kept securely – within a private home or in a locked filing cabinet within a school environment.
 - Any transmission of personal data in a non-electronic fashion (external post, internal post etc) will be done as securely as possible (sealed envelopes etc).
 - Communication from The Friends to members via email will be done via The Friends Gmail account. Recipients will be blind copied to maintain privacy.
 - Communication between committee members will be via personal email accounts if the members agree. This is done on an individual private basis and not governed by The Friends policy.
 - The Friends does not have its own IT equipment and therefore the majority of Friends 'work' is conducted on its members personal IT systems. Members must therefore adhere to the following points when accessing personal data:
 - Computers, tablets or phones must have an appropriate firewall and internet gateway in place. An appropriate anti-virus or anti-malware product should be installed. Such safeguards must be updated as necessary.
 - Such devices must be password protected; guidance with regards to strong passwords should be followed (www.getsafeonline.org)
 - Any member who believes their device has suffered a security breach must inform the Chair or Secretary.
 - Personal data will be stored either on Classlist (who implements their own IT security) or within The Friends Google Drive Account.
 - Members should refrain from retaining personal data on their personal IT device unless previously agreed with the Chair or Secretary. Such an agreement would

be on an episode specific basis with an agreement for when data will be deleted from the device ie Raffle prize distribution.

- Only members with a robust need for access to the Google Account will be given the password; the expectation will be that this is limited to the elected committee members unless agreed on a specific basis with the Chair or Secretary.
- The Secretary will assume responsibility for managing the Google drive with regards to organisation and password renewal.
- Other uses of personal data.
 - If The Friends or Classlist wish to change the ways in which they utilise personal data members must be informed of and give consent for this prior to any change being made.
 - The Friends does not routinely share personal data with any third party other than Classlist. If The Friends wish to share personal data with a Third Party the relevant subjects will always be informed prior to such an event and their consent gained eg Fundraising via Estate agent boards.
 - The Friends will comply with a legal request to share data if it is correct that they do so. Such instances will be managed by the Chair and Secretary.
- Unless subject to an exemption [under the GDPR] subjects have rights with respect to their personal data held by The Friends.
 - These rights are listed within the Privacy Notice.
 - Any requests from an individual with regards to their personal data should be directed to the Secretary.
 - Classlist - An individual's right to personal data held by Classlist can be found in the Privacy Notice

Last Updated October 2018

I..... holding the position of.....confirm that I have read this Data Protection Policy.

I have read The Friends Privacy Notice (Dated October 2018).

I have understood my responsibilities with regards to Data Protection.

I know to contact the Chair or Secretary if I have any questions or concerns with regards to Data Protection.

Signed.....Date.....