

***Polehampton Church of England Junior School PTA (the PTA)***

***Registered Charity: 1039915***

***Privacy policy***

**Information on this policy**

Your personal information (such as your name and contact details, known as 'personal data') is protected by specific legislation:

- Until 25 May 2018: The Data Protection Act 1998
- 25 May 2018 onwards: General Data Protection Regulation (GDPR) (Regulation (EU) 2016/679)
- Privacy and Electronic Communications (EC Directive) 2003

The laws in this area continue to develop quickly. We take our responsibilities around data very seriously, and it's important to us that you understand how and why we ask for and work with your details. Your privacy is important to us and we have policies to ensure that we collect only the data that we need to carry out our business, and that we don't keep it any longer than we need to.

This policy explains how we collect, manage, use and protect your personal data.

We are committed to ensuring that your privacy is protected. If you would like more information on anything in this policy, please do get in touch with us.

Our Data Protection Officer is Gemma Smith, email: [pjspta@hotmail.co.uk](mailto:pjspta@hotmail.co.uk).

This policy is effective from 25 May 2018.

**Requesting access to your personal data**

Under data protection legislation, parents, teachers and pupils have the right to request access to information about them that we hold. To make a request for your personal information, please contact the PTA using the details at the end of this document.

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

### **Why we collect and use personal data**

We collect personal data to help us to process your requests, keep in touch with you and to help us to interact with you in the most effective way.

Examples of why we process your personal data include:

- To keep you updated on the PTA calendar
- To make sure you know about events that you can participate in as a member of the PTA;
- To invite you to participate in campaigns;
- To send you fundraising appeals;
- To process donations or other payments, and verify financial transactions to protect you from fraud (including Voluntary Donations);
- To process Gift Aid donations and Gift Aid Declarations;
- To check with you on how you want us to contact you, and record these preferences;
- To keep notes of conversations that you have with our team, as a reference if you want to revisit the conversation later;
- To notify you of changes to our policies when these affect you;
- If we need to do so to comply with a law, process or regulatory requirement.

### **The information that we collect**

The personal data that we collect about you will be based on how you interact with us, but we collect the following information from many of our supporters:

- Your name;
- Your postal and email addresses;
- Your telephone number or numbers;
- The name of your children attending Polehampton Junior School and which year group they are in;
- Details of any donations that you have made to us;
- Whether or not you have signed up to the Gift Aid Scheme, and when you did so;
- Where you have signed Voluntary contribution Scheme – your financial information where direct debit or regular contributions have been signed up to;
- Your child's emergency contacts and any medical history we need to be aware of, so we can fulfil our duty of care;
- Events that you have taken part in or enquired about.

There is also other information that we may collect and hold in specific circumstances. For example:

- Health information that you give us if you are participating in an event, to help us to ensure your safety.

## **Who we share this information with**

We routinely share pupil information with:

- The PTA Committee
- The School
- Volunteers
- HMRC

## **Sensitive data**

As a charity we only need any medical history that will enable us to fulfil our duty of care. We do not collect other sensitive data.

## **How and when we collect information about you**

There are a number of ways that we collect information; most often this will be directly from you, for example, if you fill out a form, email the PTA or directly with one of our team members. Whenever we ask for information from you we will explain why we are asking for it (including by reference to this policy), and you will always be given a choice about how we communicate with you.

## **Our legal basis for processing your information**

We comply with Article 6(1)(c) and Article 9(2)(b) of the General Data Protection Regulation (GDPR)/Data Protection Act 2018.

## **Processing your data on the basis of your consent**

When you give your consent for us to contact you, we do not treat this as valid indefinitely. However, we understand that our supporters want to continue to hear from us whilst they have an active relationship with us, and for a period afterwards.

Here are some examples of what we mean by an **active relationship**:

- Your child attends Polehampton Junior School;
- If you make a donation or sponsorship payment to us, including regular monthly gifts;

We will consider your consent to be valid whilst you take these actions, and then for any legal requirement and for tax and accounting purposes. When you no longer have an active relationship with the school, all your data will be deleted, except where required to retain for legal, tax and accounting purposes.

You can withdraw your consent at any time. If you wish to do so, or have any questions on this, please do just get in touch us.

### Administrative messages

There are some administrative messages that we legally must share with you.

Examples of these include:

- Confirming where you have made a Gift Aid Declaration orally, so that we can give you the information on the tax implications of this;

### Social media

Using social media is a great way for us to update you on our work, and let you know the difference your support is making. There are Facebook pages linked to Polehampton Junior School and Polehampton Infant School which has been set up as an opt-in site. The PTA members are members of these groups and from time to time post information about PTA run events. This is not maintained by the Junior School PTA and is not covered by this privacy agreement. Data on the groups are covered by Facebook privacy rules.

### Where we have a legal requirement

We will always share data where we have a legal requirement to do so. Examples of this include providing audit information to HMRC for our Gift Aid claims or if we are required to do so by law enforcement officials.

### How long we keep your data for

We want to make sure that we have up to date records for as long as you are in an **active relationship (see page 3)** with the PTA, so for as long as you take actions on our behalf or to engage with us, such as participate in our events, donate to us or correspond with us. Once you are no longer in an active relationship, we will keep your data for a set period of time, which we calculate depending on the information that you originally provided, and why you gave it to us. At the end of this time period, we will remove any personal details from our records of you, to ensure that any information is entirely anonymous.

In general, we will keep records of financial donors for at least seven years, to meet our requirements for any Gift Aid audit from HMRC and any other tax or accounting purposes. If we have asked for sensitive personal data specific to an event, we will dispose of this data within a month after the event.

Where your active relationship relates only to your child attending the school, data will be removed except for that required as mentioned above for financial donors, when your child leaves the school.

You can find more detailed information on how long we keep your data for, and other timescales that might apply below.

In most cases we will keep records for seven years after you last make a donation to us. This ensures that we keep the information we need for any financial audit (including Gift Aid audits).

### What happens at the end of this time period?

At the end of this time period, we will securely remove your personal details from our records, to ensure that they are entirely anonymous.

### **Your right to be forgotten**

You have a right to be forgotten, which means that you can ask us to delete your personal details before the end of the time limits we've listed above. You should know that there are some circumstances where we may need to keep your details, for example, in order to comply with a legal, tax or accounting obligation. If this situation occurs then we will explain and discuss these circumstances with you.

If you would like to discuss or exercise this right, please do get in touch with us.

### **How we keep your information secure**

We take the care of your data very seriously and we use a combination of organisational and technological security measures to protect your personal information to the highest possible standards. Access to all data is protected by complex passwords, including letters, numbers and characters. We make sure that only PTA Committee who need to access your personal data can do so.

### **How to control the marketing that we send you**

We do not do marketing, but if you have an issue with what we are communicating, please contact us.

We will ensure that our records are updated as soon as possible once we receive your instructions.

### **Changes to this Policy**

This policy was last updated in May 2018.

From time to time, we may make changes to this Policy and you will always be able to see here when it was last updated. If we make significant changes, such as in how or why we process your personal data, we will also publicise these changes on our website or may contact you directly with more information.

Please do revisit this policy each time you consider giving your personal data to the PTA.

**Please note: information supplied to the Polehampton C of E Junior School ("the School") is confidential and held entirely separately to that supplied to the Polehampton C of E Junior School PTA. The exception to this is the school class list which is given to us by the School at the beginning of each academic year. School data is governed by the School's own privacy policy and relevant sections of data protection legislation (please see the School's website under Policy Documents).**

### **Contact**

If you would like to discuss anything in this privacy notice, please contact:

Gemma Smith, Data Protection Officer, Polehampton C. of E. Junior School PTA  
[pjspta@hotmail.co.uk](mailto:pjspta@hotmail.co.uk)

