

1. Introduction

The **St Laurence School Association (SLSA)** needs to collect and use certain types of information about the Individuals who come into contact with the **SLSA** in order to carry on our work. This personal information must be collected and dealt with appropriately whether is collected on paper, stored in a computer database, or recorded on other material and there are safeguards to ensure this under the Data Protection Act 1998 and as updated by the GDPR regulations of 25 May 2018 (DPA 2018).

The **SLSA** is the parents' association of St Laurence School, Bradford on Avon and it comes under the supervision of the School for all data protection issues. However, as it holds its own records of personal data, this policy has been written to guide the Officers of the **SLSA**. For GDPR requirements the SLSA should be regarded as a separate entity from St Laurence School.

2. Data Controller

The **Chair of the SLSA** is the Data Controller under the regulations, which means that they determine what purposes personal information held and will be used for. They are also responsible for notifying the Information Commissioner of the data the SLSA holds or is likely to hold, and the general purposes that this data will be used for. The SLSA is not obliged to register with the ICO but may do in the future.

This elected position is held for a year from the AGM.

The data to be held will likely be : names of parents, contact details (telephone, mobile, email, address), interests / expertise, names of children

3. Disclosure

The **SLSA** will not share data with other agencies

The **SLSA** regards the lawful and correct treatment of personal information as very important to successful working, and to maintaining the confidence of those with whom we deal.

The **SLSA** intends to ensure that personal information is treated lawfully and correctly.

To this end, The **SLSA** will adhere to the Principles of Data Protection, as detailed in the Data Protection Act 1998 and DPA 2018.

Specifically, the Principles require that personal information:

- a) Shall be processed fairly and lawfully and, in particular, shall not be processed unless specific conditions are met,
- b) Shall be obtained only for one or more of the purposes specified in the Act, and shall not be processed in any manner incompatible with that purpose or those purposes,

- c) Shall be adequate, relevant and not excessive in relation to those purpose(s)
- d) Shall be accurate and, where necessary, kept up to date,
- e) Shall not be kept for longer than is necessary
- f) Shall be processed in accordance with the rights of data subjects under the Act,
- g) Shall be kept secure by the Data Controller who takes appropriate technical and other measures to prevent unauthorised or unlawful processing or accidental loss or destruction of, or damage to, personal information,
- h) Shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of Individuals in relation to the processing of personal information.
- i) The basis on which the SLSA collects data are those of : consent and legitimate interest

The **SLSA** will, through appropriate management and strict application of criteria and controls:

- Observe fully conditions regarding the fair collection and use of information
- Meet its legal obligations to specify the purposes for which information is used
- Collect and process appropriate information, and only to the extent that it is needed to fulfill its operational needs or to comply with any legal requirements
- Ensure the quality of information used
- Ensure that the rights of people about whom information is held, can be fully exercised under the Act. 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 organisational security measures to safeguard personal information

- Ensure that personal information is not transferred abroad without suitable safeguards
- Treat people justly and fairly whatever their age, religion, disability, gender, sexual orientation or ethnicity when dealing with requests for information
- Set out clear procedures for responding to requests for information

4. Data collection

Informed consent is when

- An Individual 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 then gives their consent.

The **SLSA** will ensure that data is collected within the boundaries defined in this policy. This applies to data that is collected in person, or by completing a form.

When collecting data, The **SLSA** will ensure that the Individual:

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

When collecting personal data, consent will be requested and assumed to be given by the ticking of a box accompanied by the statement, 'I give my consent for my personal information to be stored and processed by the SLSA in accordance with its data protection policy. I understand that I can remove my consent, ie. 'opt out', at any time'.

For online consent, the SLSA Facebook page will have a suitable statement to the effect that, by connecting / liking / linking with the SLSA via Facebook, the user gives their consent for their online contact details to be stored and for them to receive communication from the SLSA.

5. Data Storage

Information and records relating to individuals will be stored securely and will only be accessible to authorised officers of the **SLSA** and to associated volunteers for the single purpose of the task for which they have been authorised.

Information will be stored for only as long as it is needed or required statute and will be disposed of appropriately.

It is the **SLSA's** responsibility to ensure all personal and company data is non-recoverable from any computer system previously used within the organisation, which has been passed on/sold to a third party.

6. Data access and accuracy

All Individuals have the right to access the information the **SLSA** holds about them. The **SLSA** will also take reasonable steps ensure that this information is kept up to date by asking data subjects whether there have been any changes.

In addition, the **SLSA**

will ensure that:

- It has a Data Protection Officer with specific responsibility for ensuring compliance with Data Protection, this will be the Chair of the Association, unless delegated by them to another officer.
- Everyone processing personal information understands that they are contractually responsible for following good data protection practice
- Everyone processing personal information is appropriately trained to do so, it is an aspiration of the Association to have Officers appropriately trained But in the absence of formal training, an awareness of the issues surrounding data protection should be given by the Chair to each Officer and volunteer as needed
- Everyone processing personal information is appropriately supervised
- Anybody wanting to make enquiries about handling personal information knows what to do
- It deals promptly and courteously with any enquiries about handling personal information
- It describes clearly how it handles personal information

- It will regularly review and audit the ways it hold, manage and use personal information, to be done at the AGM
- It regularly assesses and evaluates its methods and performance in relation to handling personal information
- All Officers and volunteers are aware that a breach of the rules and procedures identified in this policy may lead to disciplinary action being taken against them. This may be to ask them to step down from their responsibility

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 the Data Protection Act 1998. This has been amended by the DPA 2018. And guidance has been gained via the Parentkind.net site of which we are members

In case of any queries or questions in relation to this policy please contact the The **SLSA** Data Protection Officer:

In the first instance, contact the Chair of the Association via the email address : slsa@st-laurence.com.

Signed: *Robert Beesley*

(paper copy signed and stored with the Constitution of the Association)

Position: Chair

Date: 10 May 2018

Review Date: the AGM of the Association

Glossary of Terms

Data Controller – The person who (either alone or with others) decides what personal information the SLSA will hold and how it will be held or used.

Data Protection Act 1998 – The UK legislation that provides a framework for responsible behaviour by those using personal information.

Data Protection Officer – The person(s) responsible for ensuring that the SLSA follows its data protection policy and complies with the Data Protection Act 1998.

Individual – The person whose personal information is being held or processed by the SLSA for example: a parent or supporter or volunteer.

Explicit consent – is a freely given, specific and informed agreement by an Individual in the processing of personal information about her/him. Explicit consent is needed for processing sensitive data. The SLSA does not intend to collect such data.

Notification – Notifying the Information Commissioner about the data processing activities of the SLSA as certain activities may be exempt from notification. This to be done via the School, as it is the supervisor of the SLSA's data collection activities.

The link below will take to the ICO website where a self assessment guide will help you to decide if you are exempt from notification:

http://www.ico.gov.uk/for_organisations/data_protection/the_guide/exemptions.aspx

Information Commissioner – The UK Information Commissioner responsible for implementing and overseeing the Data Protection Act 1998.

Processing – means collecting, amending, handling, storing or disclosing personal information.

Personal Information – Information about living individuals that enables them to be identified – e.g. name and address. It does not apply to information about organisations, companies and agencies but applies to named persons, such as individual volunteers or employees within the SLSA

Sensitive data – refers to data about:

- Racial or ethnic origin
- Political affiliations
- Religion or similar beliefs
- Trade union membership
- Physical or mental health
- Sexuality
- Criminal record or proceedings

This pack has been adapted with permission from Voluntary Action Leicester Model Data Protection Policy.