



Friends of Winchcombe School (FoWS)

Charity no: 1197925

GDPR Policy

April 2023

### **What is GDPR?**

The General Data Protection Regulation (GDPR) (EU) 2016/679 is a regulation in EU law on data protection and privacy for all individuals within the European Union and replaces the Data Protection Act 1998. It came into effect on 25th May 2018. Please visit [www.ioc.org.uk](http://www.ioc.org.uk) for more detailed information.

### **Why do the Friends of Winchcombe (referred to throughout this policy as PTA or FoWS) need a GDPR Policy?**

The GDPR Policy explains that the FoWS will:

- Only collect information that is needed for a specific purpose
- Keep it secure
- Ensure it is relevant and up to date
- Only hold as much as is needed, and only for as long as it is needed

Personal data that we may collect, use, store and share:

- Name and address
- Other contact information including email addresses and telephone numbers
- Information provided by you about the child/ren you are responsible for. E.g. allergy information for school events

### **Basis for Processing Data**

The Charity processes data on the basis of "Legitimate Interest". In determining this basis, consideration has been given to the following three tests and a 'lawful basis assessment' completed with the ICO:

1. Purpose test: Data is only held to maintain contact details of those who have a relationship with the Charity (e.g. parents who make payments to the Charity and individuals / organisations related to FoWS events).

2. Necessary test: The maintenance of the data allows reconciliations to be carried out in relation to payments received by, and paid out of, the Charity. The maintenance of the data allows fundraising activities to be held by FoWS and to ensure participants are kept safe.
3. Balancing test: All individuals and organisations have freely provided the information that is maintained by the Charity.

### **Why we use this data**

We use this data to:

- Contact individuals for support and help at school fundraising events
- Compile a list of attendees and year group for school fundraising events
- Compile a list of emergency contact numbers
- Contact winners of raffles
- Ensuring the safety of the child/ren you are responsible for whilst attending our events

### **What information will the FoWS request to send to a third Party and why?**

The FoWS may offer fundraising initiatives from a third party that allow items to be ordered or places to be booked in return for the PTA receiving a donation. With these initiatives, parents/carers will be required to complete an order or booking form, therefore giving permission for the FoWS to pass their information to the third party. Whilst FoWS will take necessary steps to ensure that the third party has appropriate data protection and privacy policies in place it is your responsibility to ensure you are happy for your information to be shared with the third party.

Typically, personal information required will consist of a combination of the following:

- A parent/carers name, contact details and signature – to confirm the order/booking or allow the FoWS or third party to get in touch with any queries
- Child's name, class and school – in order for the items/tickets to be passed on correctly
- Address – for any items that require postal delivery

### **How is the information stored?**

All paper forms will be kept in a secure location. Information that has been transferred to computer data or was obtained electronically, will be kept password protected.

### **Who has access to the information?**

Only FoWS trustees (Chair, Secretary and Treasurer), are authorised to access this information. On occasion it may be necessary to pass on the information to other committee members. Reasons would include, but not limited to, distributing items to classes/children, confirming event attendance, when providing refreshments during events or ensuring our first aider is aware of any existing medical or allergic conditions.

**How will the information be disposed of?**

Once the information deadline has been reached, paper information will be processed for confidential shredding and computer files will be permanently deleted.

**What if someone else (including other parents/carers) send you information about me or my children?**

If we are passed any information by a third party that was unauthorised, we will immediately get in touch with you to tell you what we have, who from and why. If you inform us that we are not to have this information it will be destroyed immediately.

**Why can't the FoWS ask the school for some of the information?**

The FoWS is a volunteer organisation, although we fundraise for The Winchcombe School, the FoWS is a separate body and we are governed by the rules laid out in our constitution. Therefore, The Winchcombe School cannot share any personal information with the FoWS without obtaining permission beforehand. The FoWS are also not permitted to share information with the school without prior permission.

The Winchcombe School will communicate with parents/carers on our behalf, where parents/carers have received a text message/email/letter sent on our behalf we have not had access to the data used to send this.

**What if I have questions?**

If you have any questions regarding the FoWS GDPR Policy or the data we hold about you, you can get in touch by contacting us at [winchombefriends@gmail.com](mailto:winchombefriends@gmail.com).

You have the right to withdraw consent in writing to [winchombefriends@gmail.com](mailto:winchombefriends@gmail.com).