



Data Protection Policy

Clyst Hydon School Association (CHSA) recognises that it has a legal responsibility under the General Data Protection Regulation (GDPR) to ensure that any personal information is only used for the stated purpose for which it was collected, stored securely and not disclosed unlawfully.

This policy applies:

- to all members* of Clyst Hydon School Association who handle data on its behalf
- to all personal data that CHSA holds including names of individuals, addresses, email addresses, telephone numbers and any other information relating to individuals
- to children as well as adults
- regardless of whether the data is held electronically or on paper.

For the avoidance of doubt, this policy does not apply to members who share their personal data as friends.

In order to comply with the law and follow good practice, CHSA will ensure that:

- Personal data is only obtained for the purposes of enabling the School Association to conduct its events and activities.
- Individuals are informed why CHSA wishes to hold personal data and the purposes for which it will be used.
- Individuals are given a choice whether or not to give their contact details to CHSA. Personal details will only be held where consent has been obtained. Consent can take the form of written consent, in either paper or electronic form, or by checking a box on an electronic form.
- Individuals are aware that they have the right to access the personal data held about them, to ask for their personal information to be updated/corrected, to withdraw their consent to the holding of data at any time and to be clear how to go about getting their data removed.
- Personal data is accurate and kept up-to-date in so far as is reasonable. It is the individual's obligation to inform CHSA of any change to their personal data during the year.
- Personal data is deleted or disposed of when no longer required. In the case of members, data will be deleted or disposed of when their children cease attending the school unless the parent/guardian wishes to remain a



member of CHSA and gives annual consent to their data continuing to be held. In the case of non-members, for example where data is stored for purposes such as fundraising event participation, data will be securely deleted as soon as possible following the event. Details might need to be retained for additional time under certain circumstances, for example if an insurance claim is submitted.

- Consent is given by a parent/guardian for CHSA to hold any personal details relating to a child.
- Personal data, whether held electronically or on paper, is kept securely by taking sensible precautions and following the guidance below.
- Personal data is not sold or shared with other members or third parties without consent (except in certain circumstances where it is legally required).

Date agreed: 30 April 2018

Date to review: Summer 2019

* 'Members', as defined in the Clyst Hydon School Association Constitution (7a, 7b and 7c), are

- all parents and/or guardians of pupils attending the School, all teachers, governors and ancillary staff;
- past parents, grandparents and friends of the School who are registered with CHSA as members.



Additional Guidance

Members' contact details

To ensure the relevance and accuracy of the data it holds and opt-in consent is obtained, a contact form should be sent/given to parents/guardians of children at the school at the start of each academic year. The form should:

- ask for contact details
- explain why CHSA wishes to collect the information and how it intends to use it
- indicate who members need to contact to access their personal data or to get their personal data updated/corrected/removed
- explain that members have the right to access the personal data held about them by CHSA
- make it clear that parents/guardians are not under any obligation to give their contact details to the School Association.

Similarly, when pupils leave the school, a contact form should be sent/given to their parents/guardians giving them the option to remain a member of the School Association and give their contact information. If written consent is not obtained, personal data should be deleted/destroyed. Consent will need to be renewed on an annual basis.

Data held on paper

Data held on paper should

- be stored in a locked drawer/cupboard/filing cabinet;
- not be left out where unauthorised people could see it;
- be shredded and disposed of securely when no longer required.

Electronic data

Electronic data should

- be protected by strong passwords that are changed regularly and never shared;
- only be held on servers/computers that are protected by security software;
- not be left on a screen so that it could be viewed or accessed by unauthorised persons;
- not be saved directly to the hard drive of a laptop or a portable memory device;



- not be accessed on an unsecured WiFi.

Data collected by online organisations

In some instances, it might be necessary to use the services of a third party organisation to collect personal data. An example of this relates to online entries that are made for a CHSA fundraising running event. Data collected should be limited to those that are necessary for the running of the event and in the event of emergency medical assistance that might be required (eg name, contact details, date of birth and emergency contact details). The terms and conditions of the company should be checked to ensure that data will be held securely in line with current UK data protection legislation. Data will only be used for the stated purpose and will be deleted from the password protected account as soon as possible following the event.

Emails

When emailing members or other individuals, the "Bcc" option should be used to hide personal details from other recipients.

In so far as is possible, the Chairperson, Secretary and Treasurer should not use their personal email accounts when communicating with members or third parties about CHSA business, but the CHSA accounts set up for this purpose.

A message giving recipients the option to opt out of receiving emails from the School Association should be displayed at the bottom of emails.

Apps

The School Association should only use apps which meet data protection requirements (such as Classlist) to communicate with its members.

Photos/video footage

Photos/video footage should not be published without written consent. For children, consent must be given by a parent/guardian.



Questions or concerns

Questions or concerns relating to the data protection policy, the handling of personal data or data breaches and Subject Access Requests (SAR) should be directed to the Chairperson or Secretary.

Individuals have the right to complain to the Information Commissioner's Office (ICO) (www.ico.org.uk, telephone helpline: 0303 123 1113) if they think there is a problem with the way CHSA is handling their personal data.