

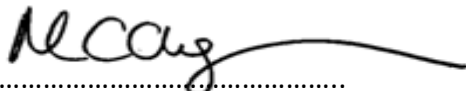


ST ALBANS GIRLS' SCHOOL

	PTA DATA PROTECTION POLICY		
	GB sub-committee: Personnel and Student Wellbeing		
	Co-ordinator: Miss E McHugh		
	Last Reviewed: Autumn 2019	Next Review: Autumn 2022	

Signed by 
Margaret Chapman (Head Teacher)

Signed by 
Claire Barnard (Chair of Governors)

Last updated	6 Jan 2020
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Definitions

Charity	means STAGS is a registered charity.
GDPR	means the General Data Protection Regulation.
Responsible Person	Means Chair of STAGS PTA
Register of Systems	means a register of all systems or contexts in which personal data is processed by the Charity.

1.	DATA PROTECTION PRINCIPLES
	<p>STAGS PTA is committed to processing data in accordance with its responsibilities under the GDPR.</p> <p>Article 5 of the GDPR requires that personal data shall be:</p> <ol style="list-style-type: none"> a. processed lawfully, fairly and in a transparent manner in relation to individuals; b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes; c. adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed; d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay; e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.”

2.	GENERAL PROVISIONS
	<ul style="list-style-type: none"> a. This policy applies to all personal data processed by STAGS PTA. b. The Responsible Person shall take responsibility for STAGS PTA ongoing compliance with this policy.
3.	LAWFUL, FAIR AND TRANSPARENT PROCESSING
	<ul style="list-style-type: none"> a. Individuals have the right to access their personal data and any such requests made to STAGS PTA shall be dealt with in a timely manner.
4.	LAWFUL PURPOSES
	<ul style="list-style-type: none"> a. All data processed by STAGS PTA must be done with parental/carer consent. b. Evidence of opt-in consent shall be kept with the personal data. c. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in the PTA held data.
5.	DATA MINIMISATION
	<ul style="list-style-type: none"> a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
6.	ACCURACY
	<ul style="list-style-type: none"> a. The Charity shall take reasonable steps to ensure personal data is accurate.
7.	ARCHIVING / REMOVAL
	<ul style="list-style-type: none"> a. To ensure that personal data is kept for no longer than necessary, STAGS PTA shall put in place an archiving policy for each area in which personal data is processed. b. Parents/Carers who request it, will have their data removed - archiving will not be necessary.
8.	SECURITY
	<ul style="list-style-type: none"> a. STAGS PTA shall ensure that personal data is stored securely using modern software that is kept-up-to-date. b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information. c. When personal data is deleted this should be done so that the data is irrecoverable.
9.	BREACH
	<p>In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, STAGS PTA shall promptly assess the risk to people's rights and freedoms and if appropriate notify the school and affected parents/carers.</p>



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Equality Impact Analysis

When reviewing all schools policies, the following Equality Impact Analysis (EIA) should be undertaken to ensure fairness of the new proposals/policy and to identify any action needed to redress any potential discrimination, positively promoting equal opportunities, improved access and participation for all.

Title of Policy:	PTA Data Protection Policy
Date:	Autumn 2019
EIA carried out by:	Miss Ellen McHugh
EIA reviewed by:	Personnel & Student Wellbeing

1. Identify the aims and objectives of the policy, what will be the proposed change and how will it be implemented	
<ul style="list-style-type: none"> • New policy contains information about: Overall aims and objectives? What is the proposed change? Who is intended to benefit from the proposal and in what way? Outcomes of the policy? How will it be put into practice and who is responsible for this? 	<p>This policy is about how STAGS PTA (Friends of STAGS) store personal data of donors to the school fund to be compliant with the GDPR.</p>

2. Assessment of Impact? To include impact of policy, any plans needed to mitigate any negative impact, equality issues to be addressed		
Characteristic	Group	Effect/Impact
• Age		No impact
• Disability		
• Gender reassignment		
• Marriage/civil partnership		
• Pregnancy/Maternity		
• Race		
• Religion or Belief		
• Sex		
• Sexual orientation		

3. Consultation	
<ul style="list-style-type: none"> • New policy contains information about: Policy audience, expected actions and outcomes. Consultation and communication process Accessibility for all Fair access to the consultation process Lessons learnt from previous consultation, if appropriate 	<p>Expectations, requirements and actions</p>

4. Decision	
<ul style="list-style-type: none"> Should the new proposal/policy be agreed and any impacts identified following consultations? What reasonable adjustments are required? 	No issues or adjustments required

5. Action Planning	
<ul style="list-style-type: none"> Any actions identified to address inequality for different groups? Any actions identified to promote equality and diversity? Where are these actions recorded and who is responsible for them? 	None

6. Monitoring and Review	
<ul style="list-style-type: none"> When will the impact assessment be reviewed? Who is responsible? 	<p>Autumn 2022</p> <p>Miss Ellen McHugh</p>

7. Publication of the results of the impact assessment	
<ul style="list-style-type: none"> Results of EIA are published – where and when? The results are kept as a public record of the EIA – where and when? 	With policy