

25 May 2018

PRIVACY POLICY
FOR TRUSTEES & PARENTS OF
SOLIHULL SCHOOL PARENTS' ASSOCIATION

Solihull School Parents' Association ("SSPA" or "we") is committed to protecting the privacy and security of your personal information.

This privacy notice describes how the SSPA collects and uses personal information about trustees of the SSPA ("Trustees"), children attending Solihull School Club and the parents or guardians of the Children ("Parents") (known collectively as "You" or "Your"), in accordance with the General Data Protection Regulation (GDPR).

The SSPA; is a "data controller". This means that we are responsible for deciding how we hold and use personal information about You. We are required under data protection legislation to notify You of the information contained in this privacy notice.

This notice applies to Trustees, Children and Parents. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide You with an updated copy of this notice as soon as reasonably practical.

It is important that Trustees, Children and Parents read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about You, so that You are aware of how and why we are using such information and what Your rights are under the data protection legislation.

DATA PROTECTION PRINCIPLES

We will comply with data protection law. This says that the personal information we hold about You must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to You and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told You about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told You about.
6. Kept securely.

THE KIND OF INFORMATION WE HOLD ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection, such as information about a person's health or sexual orientation.

Trustees:

We will collect, store, and use the following categories of personal information about Trustees:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
- Date of birth.
- Gender.
- Children who attend Solihull School.
- Records of any reportable death, injury, disease or dangerous occurrence.

Children:

We will collect, store, and use the following categories of personal information about Children:

- Name
- Attendance information at events
- Photographs for general display purposes and for publicity use on our website
- Emergency contact should Parents be unavailable and the emergency contact's contact details
- Accidents
- Records of any reportable death, injury, disease or dangerous occurrence at an event managed by the SSPA

Parents:

We will collect, store, and use the following categories of personal information about Parents:

- Name
- Home address
- Telephone numbers, and personal email addresses.

HOW IS YOUR PERSONAL INFORMATION COLLECTED?

Trustees:

We collect personal information about Trustees through completion of a Trustee Declaration Form, completed annually by the Trustee.

Children and Parents:

We collect personal information about Children and Parents from when they attend events or make contact with the SSPA, by email, letter or completion of an Application Form for an event.

HOW WE WILL USE INFORMATION ABOUT YOU

We will only use Your personal information when the law allows us to. Most commonly, we will use Your personal information in the following circumstances:

1. Where we need to perform the contract we have entered into with You.
2. Where we need to comply with a legal obligation.
3. Where it is necessary for our legitimate interests (or those of a third party) and Your interests and fundamental rights do not override those interests.

We may also use Your personal information in the following situations, which are likely to be rare:

1. Where we need to protect Your interests (or someone else's interests).
2. Where it is needed in the public interest or for official purposes.

Situations in which we will use Trustee personal information

We need all the categories of information in the list above (see Trustee section within the Paragraph entitled 'The Kind of Information We Hold About You') primarily to allow the Trustee to complete their duties as Trustees of the Charity and to enable us to comply with legal obligations. The situations in which we will process Employee personal information are listed below.

- Making a decision about a Trustee's appointment.
- Checking an Employee is legally entitled to act as a Trustee
- Assessing qualifications for a particular job or task.
- Dealing with legal disputes involving Trustees, including accidents in the course of duties.
- Complying with health and safety obligations.
- To prevent fraud.
- To monitor your use of our information and communication systems to ensure compliance with our IT policies.
- To ensure network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of an Trustee's personal information.

Situations in which theSSPA will use personal information of Children

We need all the categories of information in the list above (see Children section within the Paragraph entitled 'The Kind of Information We Hold About You') primarily to allow us to hold events for the benefit of children. The situations in which we will process personal information of Children are listed below.

- To ensure we meet the needs of the Children
- To enable the appropriate funding to be received for events from parents
- To meet safeguarding requirements
- To check complaint records
- To check attendance is recorded
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Situations in which the SSPA will use personal information of Parents

We need all the categories of information in the list above (see Parents section within the Paragraph entitled 'The Kind of Information we Hold About You') primarily to allow us to perform services for Parents and to enable us to comply with legal obligations. The situations in which we will process personal information of Parents are listed below.

- To supply information about an event that the Parent wishes to attend
- To be able to contact a Parent or a Child's emergency contact about their Child
- To ensure fees due for the event are paid

If Trustees and Parents fail to provide personal information

If Trustees and Parents fail to provide certain information when requested, we may not be able to perform the respective undertakings we have entered into with Trustees and Parents, or we may be prevented from complying with our respective legal obligations to Trustees, Children and Parents.

Change of purpose

We will only use Your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use Your personal information for an unrelated purpose, we will notify the Trustee, Child or Parent, as is appropriate in the circumstances, and we will explain the legal basis which allows us to do so.

Please note that we may process a Trustee's, a Child's or a Parent's personal information without their respective knowledge or consent, as relevant to the circumstances, in compliance with the above rules, where this is required or permitted by law.

HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal information. We have in place an appropriate policy document and safeguards which we are required by law to maintain when processing such data. We may process special categories of personal information in the following circumstances:

1. In limited circumstances, with Trustee or Parent explicit written consent.
2. Where we need to carry out our legal obligations or exercise rights in connection with Trustee appointment
3. Where it is needed in the public interest, such as for equal opportunities monitoring

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect a Trustee, a Child or a Parents' interests (or someone else's interests) and the Trustee, Child or Parent as is appropriate is not capable of giving consent, or where the Trustee or Parent has already made the information public.

INFORMATION ABOUT CRIMINAL CONVICTIONS

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where such processing is necessary to carry out our obligations and provided we do so in line with our data protection policy.

Less commonly, we may use information relating to criminal convictions where it is necessary in relation to legal claims, where it is necessary to protect the interests of You (or someone else's interests) and You are not capable of giving your consent, or where an Trustee or a Parent, as is relevant to the circumstances, has already made the information public.

We envisage that we will hold information about criminal convictions.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so, which includes but is not limited to Disclosure and Barring Service ("DBS") checks. Where appropriate, we will collect information about criminal convictions as part of the appointment process or we may be notified of such information directly by you in the course of you working with us. We will use information about criminal convictions and offences in the following ways:

- To conduct a DBS check on Trustees, to record the date of the DBS check, the number of the DBS check and the name of the body conducting the DBS check.

We are allowed to use your personal information in this way to carry out our obligations. We have in place an appropriate policy and safeguards which we are required by law to maintain when processing such data.

DATA SHARING

We may have to share Trustee, Child or Parent data with third parties, including third-party service providers and Solihull Scholl

We require third parties to respect the security of Your data and to treat it in accordance with the law.

Why might the SSPA share Employee, Child or Parent personal information with third parties?

We will share Your personal information with third parties where required by law, where it is necessary to administer the working relationship with You or where we have another legitimate interest in doing so.

Which third-party service providers process my personal information?

"Third parties" includes third-party service providers (including contractors and designated agents), local authorities, regulatory bodies, schools and other entities within our group. The following third-party service providers process personal information about you for the following purposes:

- Regulatory bodies – for ensuring compliance and the safety and welfare of the children
- Solihull School – to provide information that may be required by School
- e company with the trustees or scheme managers of the arrangement in connection with the administration of the arrangements.

How secure is my information with third-party service providers and other entities?

All our third-party service providers and other entities are required to take appropriate security measures to protect Your personal information in line with our policies. We do not allow our third-party service providers to use Your personal data for their own purposes. We only permit them to process Your personal data for specified purposes and in accordance with our instructions.

What about other third parties?

We may also need to share Your personal information with a regulator or to otherwise comply with the law.

DATA RETENTION

How long will you use my information for?

We will only retain Your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Data Retention Policy which is available on our website and from the Secretary of the SSPA . To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of Your personal data, the purposes for which we process Your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise Your personal information so that it can no longer be associated with You, in which case we may use such information without further notice to You. Once you are no longer an Trustee, Parent or a Child benefiting from the SSPA's services, as is appropriate, we will retain and securely destroy your personal information in accordance with our data retention policy.

RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

It is important that the personal information we hold about You is accurate and current. Please keep us informed if Your personal information changes during your working relationship with us.

Your rights in connection with personal information

Under certain circumstances, by law You have the right to:

- **Request access** to Your personal information (commonly known as a “data subject access request”). This enables You to receive a copy of the personal information we hold about You and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about You. This enables You to have any incomplete or inaccurate information we hold about You corrected.
- **Request erasure** of your personal information. This enables Trustees or Parents to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove Your personal information where You have exercised Your right to object to processing (see below).
- **Object to processing** of Your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about Your particular situation which makes You want to object to processing on this ground. You also have the right to object where we are

processing Your personal information for direct marketing purposes.

- **Request the restriction of processing** of Your personal information. This enables Trustees or Parents, as is appropriate, to ask us to suspend the processing of personal information about You for example if You want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of Your personal information to another party.

If You want to review, verify, correct or request erasure of Your personal information, object to the processing of Your personal data, or request that we transfer a copy of Your personal information to another party, please contact the manager in writing.

No fee usually required

You will not have to pay a fee to access Your personal information (or to exercise any of the other rights).

What we may need from You

We may need to request specific information from You to help us confirm your identity and ensure Your right to access the information (or to exercise any of Your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

RIGHT TO WITHDRAW CONSENT

In the limited circumstances where You may have provided Your consent to the collection, processing and transfer of Your personal information for a specific purpose, You have the right to withdraw Your consent for that specific processing at any time. To withdraw Your consent, please contact the manager. Once we have received notification that You have withdrawn Your consent, we will no longer process Your information for the purpose or purposes You originally agreed to, unless we have another legitimate basis for doing so in law.

CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide You with a new privacy notice when we make any substantial updates. We may also notify You in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy policy, please contact the Secretary of the SSPA on secretary.sspa@hotmail.co.uk