

Friends of Bletchingley Village Primary School (FOBS)

General Data Protection Regulation (GDPR) Policy

Purpose

This policy outlines how the **Friends of Bletchingley Village Primary School (FOBS)** will comply with **General Data Protection Regulation** (the GDPR). Compliance with GDPR is mandatory.

This policy is supported by a publicly available **FOBS Privacy Notice** and a detailed **Data Retention Schedule (Appendix A)**.

Scope

This policy applies to all members of FOBS and has been formally approved by the Trustees.

Data Processing Principles

GDPR covers the processing (including storage) of personal data, or personal information. Personal data means anything that can identify an individual, including names, email addresses, home addresses, phone numbers, photographs/video, medical history, dietary requirements, age and more. This data can be in any form, whether digital or hard copy.

FOBS adheres to the six statutory GDPR principles (Lawfulness, Fairness, Purpose Limitation, Minimisation, Accuracy, Storage Limitation, and Integrity). Additionally, we embed the Organisation for Economic Co-operation and Development (OECD) Ethical Principles:

- **Integrity & Purpose:** Data is only collected to support FOBS activities (e.g., event planning, volunteer coordination etc.).
- **Wellbeing & Rights:** We protect individuals from harm by not sharing parent or pupil information without explicit permission and we ensure, as far as possible, that no family is disadvantaged if they choose not to share data.
- **Transparency:** We will make our data practices visible, use simple language in our communications and provide easy "opt-out" paths.
- **Proportionality & Responsibility:** We will ensure that data use is necessary, minimal, and appropriate for the context. We will avoid accidental exposure by using the FOBS Google Workspace for all official business.
- **Accountability:** The FOBS Secretary oversees data handling with annual reviews. As FOBS is a small charity, there is no requirement to appoint a Data Protection Officer.
- **Ethical Culture:** We will promote a culture of respect of family privacy and encourage volunteers to ask: "Do we really need this data?".

Data Security & Storage

- **Secure Environment:** All digital data is stored on the FOBS Google Workspace with 2-step verification. This workspace is only accessible by FOBS Committee members and only for the purposes of their role. Once a committee member leaves their role, they will no longer have access to the workspace.
- **Personal Devices:** Photos or videos taken at events on personal devices must be transferred to the Workspace and deleted from personal storage within 30 calendar days. Images without consent must be deleted immediately.
- **Hard Copies:** Paper records are digitised within 48 hours where necessary and then immediately shredded.

Data Minimisation & Retention (Appendix A)

We do not collect "just in case" data. All data is held only as long as necessary to fulfil its purpose. Once that purpose has been met the data will be securely deleted or destroyed.

- **Annual Audit:** At the end of each financial year, we refresh contact lists and delete inactive records to ensure that our data is accurate and up to date.
- **Retention Schedule:** For specific timeframes regarding different data types (e.g., 6 years for Gift Aid), refer to Appendix A: Data Retention Schedule. When data reaches its expiry date FOBS will:
 - o **Digital:** Permanently delete files from the Google Workspace trash and ensure no copies remain on local drives.
 - o **Physical:** Shred all paper records using a cross-cut shredder.

Third Parties & Sharing

We never sell or trade data. We share data only with:

- **HMRC, Charity Commission, NatWest Bank:** For legal and financial reporting.
- **Administrative platforms:** We use third party providers such as Google and SumUp to support with the administration and operation of FOBS. We may share personal information of our Trustees and Committee members with these platforms to enable access to these services.
- **Fundraising platforms:** We use GDPR-compliant platforms like People's Fundraising, Easy Fundraising and Just Giving. Personal data collected by these platforms may be accessed by FOBS in order to conduct our activities.
- **Fundraising activity:** We may share pupil names and classes with third parties who are making goods to be sold via FOBS (e.g. Christmas cards, tea towels).
- **The school:** Only via a formal Information Sharing Agreement.

Transparency & Individual Rights

Our **Privacy Notice** sits alongside this policy and provides data subjects with clear information on how we process their personal data, the legal basis for processing and how to exercise their rights (Access, Rectification, or Erasure). Requests in respect of data should be sent to FOBS via hello@fobs-pta.co.uk.

Upon notification of withdrawal, FOBS will cease all processing of the data subject's personal data and securely delete it from our records, unless a separate legal obligation requires its retention.

Data Breaches

In the event of a data breach (e.g., a lost device containing personal data), the Chair of FOBS will be notified immediately and an assessment will be undertaken to consider whether any personal data is at risk. If the breach poses a risk to individuals, we will inform affected individuals and we will report the breach to the Information Commissioner's Office (ICO) within 72 hours.

Contact

If you have any questions about this policy or how your data is handled, please contact FOBS at hello@fobs-pta.co.uk

If you are not satisfied with our response or do not believe that we have treated your concerns appropriately, then you can escalate to the Information Commissioner's Office (ICO):

ICO helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Policy review

This policy will be reviewed annually by the FOBS committee to ensure it continues to support both the organisation and its volunteers effectively.

Policy Approval

Approved and adopted by the committee of FOBS in February 2026.

Next review: November 2026

Appendix A – data retention schedule

Record type	Lawful basis for processing	Retention period
Financial and Gift Aid Records (required for HMRC compliance and potential audits)		
Gift Aid Declarations (Enduring)	Legal obligation	6 years after the end of the accounting period in which the last donation was made.
Gift Aid Declarations (One-off)	Legal obligation	6 years after the end of the accounting period they relate to.
Accounting Records & Bank Statements	Legal obligation	6 years from the end of the financial year in which they were made.
Cancelled Gift Aid Declarations	Legal obligation	6 years from the date of the donor's notification of cancellation.
Pledged Donations & Reconciliations (Records matching a promised gift to the final bank receipt – once a payment has been reconciled, personal information will be removed from the data stored)	Legitimate Interest	6 years from the end of the financial year in which the pledge was fulfilled.
Unfulfilled Pledges (Data on individuals who promised a donation that was never received)	Legitimate Interest	Deleted at the end of the Annual Data Audit unless there is a clear reason to re-contact.
Governance and Trustee records		
Trustee Contact Details (name, email address, phone number)	Legitimate Interest	For the duration of their term, plus 1 year for handover purposes.
Trustee identity / demographic details to enable registration with the Charity Commission, HMRC and NatWest (date of birth, address, place of birth, bank account details, NI number)	Legitimate Interest	To be deleted as soon as registration has been successful
Trustee Minutes	Legitimate Interest	6 years (Standard for charities)
Annual Trustee Reports	Legal Obligation	10 years from the date of the report.

Membership and Volunteer data		
General Mailing Lists	Consent	Deleted annually at the end of the academic year unless the parent "re-opts in".
Volunteer Contact Lists	Legitimate Interest	Deleted 2 years after the volunteering role ends, unless there is an ongoing legal need.
Events & Media		
Event Sign-up Sheets (including any dietary requirements or medical information)	Legitimate Interest	Destroyed immediately after the event and final reconciliation.
Photos & Videos	Consent	Transferred to Google Workspace and deleted from personal devices within 30 days. Retained in Workspace until the child leaves the school or consent is withdrawn.
Accident/Incident Records	Legal Obligation	3 years from the date of the accident (or until the child is 21 if involving a minor).
Raffle/Lottery Records (Ticket sales, winner details, and prize distribution)	Legal Obligation	3 years from the date of the draw (recommended by Gambling Commission).
Suppliers Contact Details (name, address, contact details and bank account details of suppliers)	Legitimate Interest	6 years after the last payment was made to the supplier
Operational Records		
Sponsorship (e.g. correspondence with local businesses and signed contracts.)	Legitimate Interest	6 years post-event.
Reconciliations (e.g. temporary "check-off" lists used at the door of an event)	Legitimate Interest	Destroyed within 48 hours of bank reconciliation.
Hardship/Grants (e.g. records of discounted tickets or supported entries)	Legitimate Interest	1 year (to allow for annual audit).
Order management (e.g. a list of pupils and their class to be shared with a private company making Christmas Cards)	Legitimate Interest	Destroyed within 48 hours of the orders closing