



friends

OF HOLMEWOOD

Data Protection Policy

To help improve communication between members, and to assist with the organisation of events, the Friends of Holmewood collects, stores and uses personal information about their members, including home address details, telephone numbers and/or email addresses.

As the Friends of Holmewood is a not-for-profit organisation and only holds personal data for the purposes of membership or for providing and administering activities for members then we recognise that we are exempt from registering as a data controller. (ICO survey).

This applies provided the Friends of Holmewood does not download onto a hard drive any data from PTA-Events, which hosts the current FOH website, or PayPal which processes member payments as these organisations are responsible for securely storing customer information. The fact that the Friends of Holmewood holds personal data on Committee and/or members does however imply we have a duty to use this information responsibly.

Legitimate Reasons for Data Being Held

The Friends of Holmewood will only hold information about members in these circumstances:

- The Secretary holds a list of all volunteers that are willing to be asked to volunteer at events.
- The Treasurer holds the completed Gift Aid and PTA donation forms in order to manage the tracking of donations and claiming gift aid from HMRC.
- The Chair submits the personal details of the Trustees (Chairman, Secretary, Treasurer and committee members) to the Charity Commission and they assume responsibility for securely holding this data.

Ensuring Responsible Use

The PTA will ensure that the information it holds is subject to the following controls:

- Data will be deleted when no longer required either because the member has left or has asked to be removed from the volunteer lists.
- HMRC rules for gift aid require that we hold onto donor details for six years following the end of the accounting year in which the last donation occurred <https://www.gov.uk/government/publications/charities-detailed-guidance-notes/chapter-3-gift-aid#chapter-330-how-long-records-should-be-kept> and at this point the PTA will destroy the forms holding personal financial data.
- Members will be aware that we hold this information because they have voluntarily supplied it when filling in Friends of Holmewood forms or sign-up sheets.
- Forms which request personal information will clearly state how data is to be held/used.
- No data held on members will be passed onto third parties outside the Committee and will only be shared within Committee on a need-to-know basis.
- Data on hardcopy or softcopy forms will be held securely as far as reasonably possible being password encrypted.
- Email circulations will ensure members are blind copied and all member emails should go through the Secretary for distribution.

The Information Commission Office has a guide, <https://ico.org.uk/for-organisations/charity> which aims to answer questions regularly raised by charities and voluntary organisations.