Friends of Indian Queens School (FOS)

Data Protection and Privacy Policy

1. Introduction

The UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 regulate the way in which information about individuals connected with the Friends of Indian Queens School (FOS) (the "Charity") is collected, stored, used, shared and retained.

The Charity is committed to processing personal data lawfully, fairly and transparently in accordance with the requirements of the UK GDPR and the Data Protection Act 2018. Appropriate technical and organisational measures will be taken to protect personal data and to safeguard the rights and freedoms of individuals.

The Charity recognises that data protection is not a barrier to safeguarding and will share information where necessary to protect a child, in line with the school's safeguarding procedures and Keeping Children Safe in Education 2026 (KCSIE 2026).

This Privacy Notice applies to members, parents/guardians of children attending the school, volunteers, employees of the school, contractors, suppliers, supporters, donors and members of the public who will make contact with the Charity.

The Data Controller for the Charity is the Head of the Charity. Being a small charity, there is no requirement to appoint a Data Protection Officer.

Members of the General Committee are responsible for ensuring that any data that is processed by the Charity is processed in accordance with the Act and GDPR (the “Data Controllers”). At present all data is to be processed by members of the General Committee and so no agreements are in place with any external “Data Processors”.

This policy sets out how personal data is collected, stored or transmitted on behalf of the Charity. Non-compliance could result in complaints, fines, adverse publicity and reputational damage.

The Charity takes privacy extremely seriously. The Charity will not share, sell, rent or lease your details to anyone else for marketing purposes. The Charity will only ever use your information for charitable purposes, to keep you informed, allow you to support us and explain how your donations make a difference to our school.

If persons or organisations that choose to hear from the Charity may be sent information based on their previous offers of assistance. This might be about

volunteering for the Charity, events, fundraising, appeals, admin or other charitable purposes.

All members of the General Committee must comply with the regulations when handling personal data and must attend any training session on Data Protection issues which the Charity considers necessary.
Any member of the General Committee who considers that this policy has not been followed should contact the Trustees of the Charity.

The Charity take reasonable and appropriate measures to protect Personal Information from loss, misuse and unauthorised access, disclosure, alteration and destruction, taking into account the risks involved in the processing and the nature of the Personal Information.

The Charity complies with its obligations under the GDPR and the Act by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

In most cases the lawful basis for processing will be through the performance of a contract for personal data of our Committee Members and adult volunteers and legitimate interest for personal data of our customers and supporters. Sensitive (special category) data for both Committee Members and adult volunteers will mostly align to the lawful basis of legitimate activities of the Charity. Explicit consent is requested from parents/guardians to take photographs of children attending our school. On occasion we may use legitimate interest to process photographs where it is not practical to gather and maintain consent such as large- scale events. On such occasions we will make it clear that this activity will take place and give individuals the opportunity to exercise their data subject rights.

The Charity will use personal data for the following purposes:

- to provide information about meetings, activities, training courses and events to our members and other volunteers.
- to administer records
- to fundraise and promote the interests of the Charity
- to manage our volunteers
- to maintain our own accounts and records (including the processing of gift aid applications)
- to inform you of news, events, activities and services being run by the Charity
- to ensure and evidence your suitability if volunteering for a role in the Charity
- to contact your next of kin in the event of an emergency
- to ensure you have and maintain the correct certifications, qualifications and skills.

The Charity will use personal sensitive (special) data for the following purposes:

- for the protection of a person’s health and safety whilst in the care of the

Charity
- to respect a person's religious beliefs with regards to activities, food and holidays
- for equal opportunity monitoring and reporting if required

The Charity may share your personal information with others outside of the Charity where it needs to meet a legal obligation. This may include its insurance subsidiary (Parentkind and Marsh Insurance), local authority services and law enforcement. The Charity will only share your personal information to the extent needed for those purposes.

The Charity will only share your data with third parties outside of the organisation where there is a legitimate reason to do so.

The Charity will never sell your personal information to any third party.

Where personal data is shared with third parties the Charity will seek assurances that your personal data will be kept confidential and that the third party fully complies with the GDPR and the Act.

2. General Responsibilities

Information Commissioner

The Charity is not required to register with the Information Commissioners Office, as we:

- do not hold CCTV footage;
- only process information necessary to establish or maintain membership or support;
- only process information necessary to provide or administer activities for people who are members of the charity or have regular contact with it;
- only share the information with people and organisations necessary to carry out the charity's activities; and
- only keep the information while the individual is a member or supporter or as long as necessary for member / supporter administration.

Data Processing – The Guiding Principles

The Act / GDPR requires that personal data must be dealt with in accordance with certain principles. These require that all Personal Data must be:

- processed fairly and lawfully;
- obtained correctly and in accordance with the Charity needs;
- adequate, relevant and only as much as is required for the purposes of the Charity;
- accurate, kept up to date and are erased or rectified without delay;
- kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes of the Charity; and
- processed in a manner that ensures appropriate security of the personal

data.

Basis for Processing Data
The Charity processes data on the basis of "Legitimate Interest". In determining this basis, consideration has been given to the following three tests:

1. **Purpose test:** Data is only held to maintain contact details of those who have a relationship with the Charity (e.g. parents who make payments to the Charity (such as in relation to leavers hoodies), and individuals / organisations related to the annual events.
2. **Necessary test:** The maintenance of the data allows reconciliations to be carried out in relation to payments received by, and paid out of, the Charity. Data is held regarding adults and organisations only, never children.
3. **Balancing test:** All individuals and organisations have freely provided the information that is maintained by the Charity.

Sharing/Transfer/Use of Data
Data from one function of the Charity's operations may not be used in another and it may not be transferred to any other organisation or person. Only the people authorised by the General Committee to run that part of the Charity may use the information held.

Holding of Data
Data may be held on committee member's individual computers and personal devices. However, all files which hold relevant data must be kept according to guidelines in the Appendix below, and must not be kept longer than necessary. The Trustees and Committee Members should be advised if any new data processing is due to take place, to ensure that it complies with the Data Protection Policy/Privacy Notice. There will be at least one review per year of data held by the Charity. Paper records for events are used rather than relying on secure digital systems, as often events may be held where internet and digital access will not be available. The Charity will minimise the use of paper to only what is required for an event or other service.

If the Charity wish to use your personal data for a new purpose, not covered by this Data Protection/Privacy Notice, then the Charity will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, the Charity will seek your prior consent to the new processing.

Retention Guidelines
Below is stated how the Friends of Indian Queens School will retain information and how such information will be deleted.

- Committee meeting minutes will be held permanently; these may be in paper or electronic form.
- Supporting documents (e.g. reports, events plans, and financial papers) will be held for 6 years plus the current year.
- Financial records will be held for 6 years plus the current year in line with

HMRC and charity law requirements.

- Membership lists will be held for as long as a member is active, once they leave all records will be deleted.
- All deletion of records will be done securely via shredding of paper and deletion and emptying of trash bin for electronic records.

Training Policy

All members of the General Committee who manage data are required to be trained as to Data Protection Policy. New members of the General Committee should receive data protection training to explain how they should handle and store personal data. Existing members should also be provided with refresher training on a regular basis. It is up to the Trustees to enforce this policy.

Public Access to Records

This Data Protection Policy will be available on the charity's website page and upon request. Access to and requests for changes to data records by individuals must be made in writing (including email) to the Head of the Charity.

Your Rights

As a Data Subject, you have the right to object to how the Charity process your personal information. You also have the right to access, correct, sometimes delete and restrict the personal information the Charity use. In addition, you have a right to complain to us and to the Information Commissioner's Office (www.ico.org.uk).

Unless subject to an exemption under the GDPR and the Act, you have the following rights with respect to your personal data:

- The right to be informed – you have a right to know how your data will be used by the Charity.
- The right to access your personal data – you can ask the Charity to share with you the data we have about you. This is a Data Subject Access Request ("SAR"). Any such request made to the Charity received in writing with your signature will be acknowledged and responded to within one month. If the Charity cannot meet this deadline you will be given an explanation for the delay and a new timescale to respond to your SAR.
- The right to rectification – this just means you can update your data if it's inaccurate or if something is missing.
- The right to erasure – this means that you have the right to request that the Charity delete any personal data held about you. There are some exceptions, for example, some information will be held by the Charity for legal reasons.
- The right to restrict processing – if you think that the Charity are not processing your data in line with this privacy notice then you have the right to restrict any further use of that data until the issue is resolved.
- The right to data portability – this means that if you ask the Charity share your data with you or others in a way that can be read digitally – such as a pdf. This makes it easier to share information with others.
- The right to object – you can object to the ways your data is being used.

- Rights in relation to automated decision making and profiling – this protects you in cases where decision are being made about you based entirely on automated processes rather than a human input, it's highly unlikely that this will be used by the Charity.

If you have any queries relating to this Privacy Notice or our use of your personal data, please contact the Head of the Charity.

This policy will be reviewed annually by the Friends of Indian Queens School (FOS) committee prior to the AGM.

Date adopted: 16th October 2025

APPENDIX

Password Security
All computer records which contain personal data must be protected by “strong” passwords, which must be at least 8 characters long and incorporate at least three of the following: uppercase letters, lowercase letters, symbols and numbers.

Currently, the following information is held by the Charity:

Treasurer Records
The Treasurer keeps the charity accounts. This data is kept in paper (e.g. bank statements), Excel spreadsheets and Word documents.

Charity Volunteer Records
The charity Head keeps names and email addresses of those people who have offered to help at events at the school where the Charity is involved. This information is retained by the Head on personal devices/computer. Annual requests must be made to ensure retention of this information is applicable.

Secretary Records
The secretary holds names and email addresses for members of the General Committee as well as any others who attend committee meetings and have requested minutes. These records need to be kept on the Secretary’s email server for ease of email transfer, and must not be used for any other purpose other than official business, unless the other party is a personal contact and consents to such use.

Events Records
Records are normally kept for the last two years’ events, as well as individuals who have expressly asked to be added to the mailing list for future events. This data includes Name; Company name where applicable contact name and an email address. Additional information such as a telephone number and postal address is recorded if given. This data will be deleted after two years; paper records should be destroyed by shredding.

EasyFundraising
The Charity is registered with EasyFundraising for supporters of our Charity to help raise donations through online purchases with third party companies and organisations. The data passed from EasyFundraising to the Charity is limited to initial and surname in compliance with GDPR and the Act. The Charity retains this information on personal devices for the app. This information is not passed by email or in any other form.

Any transfer of records on change of organiser can be done by email, the password must be sent separately by email or by another means e.g.: text message, mail, verbally.