

How your school can share parent contact data with your Parent Association

Updated August 2024

Classlist and GDPR

Classlist's app enables school parents to share personal data with each other within a secure, structured, GDPR compliant framework. Classlist sites are run either by the School or the Parent Teacher Associations or Friends (the "PTA"), who act as Data Controllers with Classlist acting as their Data Processor. Data is obtained on a consent basis as parents create their own Classlist account and decide exactly what to share with whom.

How schools can lawfully share parent contact details with their PTA

Where PTAs run Classlist sites they may lack a comprehensive set of parent email addresses, and cannot systematically identify and invite new parents joining the school. This makes it more difficult for PTAs to build a fully inclusive parent community.

To help resolve this, Classlist has recently heard back from the Information Commissioner's Office (ICO) and taken legal advice to establish how the school can lawfully share parent personal data with PTAs using Classlist, where both organisations share a common purpose of building a strong, supportive parent community.

ICO has indicated this data sharing should be covered through a short addition to the school's Privacy Notice. A Data Sharing Agreement between the school and PTA can also be concluded through an exchange of emails - although this is optional and not a legal requirement, it is nevertheless considered good practice. It helps establish a paper trail and assists the school with its accountability obligations.

From a legal perspective the School, as one Data Controller, will already have authority to share data with other Data Controllers. These should already be listed in the school's existing Privacy Notice.

Purpose and lawful basis for sharing data

In order to add the PTA to their Privacy Notice list, the School must state the purpose and the lawful basis for sharing data. Parents should also be notified that the Privacy Notice is being amended. This could be included as part of ongoing school communications highlighting the Classlist app.

The PTA will use Classlist for the purposes of informing parents/guardians about PTA activities, events and news and establishing and maintaining relationships and communication between parents/guardians and the PTA.

The lawful basis for sharing will either be to support the "legitimate interests" of both organisations, or to assist with the "public task" of the school, depending on the type of school involved.

A further lawful basis of "consent" is available (for example some schools specifically ask parents if they wish to share personal data with the PTA). However this is not necessary as it is within the reasonable expectations of parents that the School will share data with the PTA, who share a common purpose, reflected in the School's Privacy Notice.

Management of data shared by the school

Schools will be keen to ensure that the PTA will comply fully with GDPR requirements when using parent data and Classlist has been designed to enable this. Administrators enter parent emails supplied by the school directly into Classlist's secure system, making it easier both to invite parents

and to include them in ongoing PTA communications. This data is only visible to PTA administrators. Each parent still needs to opt in and consent to share any personal data with other parents, and can unsubscribe at any point.

Recommended wording for the Privacy Notice, Data Sharing Agreement and note to parents is set out in the Appendix below should you wish to use it.

APPENDIX : Suggested wording for Privacy Notice & Data Sharing wording

- a) Insert for the School's Privacy Notice
- b) Insert for the PTA's Privacy Notice (if separate from the Classlist Privacy Notice)
- c) School – PTA Data Sharing Agreement: draft exchange of emails
- d) School note to parents highlighting the updated Privacy Notice

a) Insert for the School's privacy notice

Suggested text

[The School] will also share names and email addresses of pupils' parents/guardians and names and classes/years of pupils with the [PTA], which [the PTA] will use through the Classlist communication system for the purposes of informing parents/guardians about [PTA] and [School] activities, events and news and establishing and maintaining relationships and communication between parents/guardians, the [PTA] and/or the [School]. If you do not want us to share personal data relating to you and/or your child(ren) with the [PTA], please contact us at [insert suitable name/email address/phone number].

Guidance on use

- Depending on the layout of the School's privacy notice, this paragraph could be added either to the section describing 'recipients' of personal data or to the section describing the 'purposes' of processing personal data (possibly following any description of the School's own processing for the same/similar purposes).
- References to "School" and "PTA" should be replaced with terms consistent with rest of the privacy notice if necessary – e.g. "us/our" instead of "School".
- Note that the suggested wording does not identify the lawful grounds which the School will need rely on for the sharing to be data protection-compliant. The School will need to satisfy itself in relation to this.

b) Insert for the PTA's privacy notice

Note - this may not be required. PTAs using Classlist for all parent communication will already be covered by Classlist's existing Privacy Notice

Suggested text

[The School] also provides [the PTA] with names and email addresses of pupils' parents/guardians and names and classes/years of pupils. We use that personal data through the Classlist communication system for the purposes of informing parents/guardians about [PTA] and [School] activities, events and news and establishing and maintaining relationships and communication between parents/guardians, [the PTA] and/or the [School]. If you do not want [the PTA] to use personal data relating to you or your child(ren), please contact us at [insert suitable name/email address/phone number].

Guidance on use

- This paragraph should be added to the section of the privacy notice that describes the PTA's purposes of processing.
- If the PTA also obtains personal data about pupils, parents/guardians and/or alumni directly, e.g. when class reps collect parents'/guardians' names and email addresses, those other methods of obtaining the personal data should also be described first.
- References to "School" and "PTA" should be replaced with terms consistent with the rest of the privacy notice if necessary – e.g. "us/our" instead of "PTA".
- Note that the suggested wording does not identify the lawful grounds which the PTA will need to rely on for the use to be data protection-compliant. The PTA will need to satisfy itself in relation to this.

c) School – PTA Data Sharing Agreement: draft exchange of emails

Suggested text

[Insert name of school] ("School") agrees to share the following personal data with [insert name of PTA] ("PTA"):

- names and email addresses of pupils' parents/guardians
- names and classes/years of pupils

The PTA agrees that it will only use the personal data through the Classlist communication system for the purposes of:

- informing parents/guardians about PTA and School activities, events and news
- establishing and maintaining relationships and communication between parents/guardians, the PTA and the School

The School and PTA agree that they will:

- each provide a privacy notice to parents/guardians explaining: (i) the sharing of personal data between the School and PTA; (ii) the purposes for which the PTA will use the personal data; and (iii) how parents/guardians can object to the sharing or use of the personal data;
- promptly inform each other of: (i) any breach of the personal data (e.g. loss, theft, unauthorised disclosure or access) relating to the sharing or use of the personal data; and (ii) any complaints, requests or other communications relating to the sharing or use of the personal data.

Agreed on behalf of the School by [insert School representative name]

Agreed on behalf of the PTA by [insert PTA representative name]

Guidance on use

This agreement does not need to be signed and can be concluded through an exchange of emails.

d) School note to parents highlighting the updated Privacy Notice

Suggested text

The [insert name of PTA] (“PTA”) has recently launched a new parent communication app called Classlist. This allows parents to choose what personal data they wish to share with other parents. The school is helping the PTA to launch and maintain this system and has amended our [Privacy Notice](#) to reflect this.

Guidance on use

This text can be included in regular communications with parents in advance of changes being made to the Privacy Notice.

IMPORTANT NOTE

All wordings above have been prepared by Classlist on the basis of discussions with the UK Information Commissioner’s Office and our legal advisors. This does not constitute legal advice. Customers use at their own risk and should seek independent legal advice.