



CHANNING SCHOOL

FUNDRAISING AND DEVELOPMENT PRIVACY NOTICE

**This policy applies to the whole School including
the EYFS**

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Reviewed by: Jade Francis (Alumnae and Development Manager) and Director of Communications, Marketing and Development (Rachell Fox)

Approved by: Roy Hill

Signed by: Board of Governors

How We Use Your Information: Fundraising and Development Privacy Notice

Introduction

This notice explains **how** and **why** the Alumnae and Development Office collects personal information about you when carrying out our fundraising and development activities.

This notice also outlines **what we do** with your information and what **decisions** you can make about your information in relation to fundraising and development.

If you have any questions about this notice please contact the Alumnae and Development Manager whose contact details are alumnae@channing.co.uk.

This notice only covers how the School uses your personal data for keeping in touch with Alumnae and also for fundraising and development purposes. For more information about how the School uses your information more widely (for example, in relation to the provision of education to pupils) please ask the Bursar for a copy of the appropriate privacy notice. The Bursar can be contacted by emailing bursar@channing.co.uk.

What is personal data?

Personal data is information about you from which you can be identified (either directly or indirectly). This includes your contact details, your relationship with the School and financial information.

What personal information does the School hold about you and how is this obtained?

We hold a specific database with information about alumnae, parents, staff, former parents, former staff and other supporters. We may share information about you with other teams within the School including but not excluding the Admissions Department and the Careers and Higher Education Departments.

You provide us with information about yourself during the course of our relationship with you. For example, when you sign up to receive communications from us or order tickets for events or when you leave the School.

In addition, we may obtain information about you from other sources. Currently these include LinkedIn, Facebook, Twitter and media articles.

We will hold information such as:

- name and date of birth;
- information about your family, for example, whether you have any brothers or sisters who
- attended the School;

- any connection you may have with other members of the School community such as other alumnae;
- the dates when you or your child attended the School (if applicable);
- if you are a former staff member the dates when you worked at the School;
- your contact details;
- information about your achievements and interests e.g. which musical instruments you played or sports team you were part of as a pupil;
- where you attended university and your occupation (if applicable);
- how you like to hear from us e.g. whether you have signed up to receive emails from us;
- your involvement with us. This can include for example correspondence with you and your attendance at our events and whether you carry out mentoring of current pupils
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media;
- survey responses to improve our services;
- any dietary requirements for catering purposes that you have provided; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal information?

We use your information in the following ways:

- to keep you informed about events and activities and in relation to your attendance at those events (for example, so that we can accommodate you if you tell us about any special needs or dietary requirements);
- to facilitate interaction between members of the School community;
- to tell you about products sold to benefit the School such as clothing and sports goods;

The Alumnae and Development Manager and the Director of Communications, Marketing and Development monitor this policy regularly. It is updated at least every two years.

- to keep you informed about what is happening at the School, for example, by sending you a copy of the School Magazine or the Alumnae Newsletter(s);
- in connection with providing financial support to the School (including making donations to the School, specific campaigns, such as for a new building or requests to support bursaries or other social impact activities); and
- in connection with the other ways in which you might support the School (such as when you volunteer to help the school or agree to mentor pupils).

We will contact you for the above purposes by email, telephone, post or by text message but we will only do this where we are allowed to do so under data protection law (for example, we will usually need your consent before sending you an email about a fundraising opportunity). If you tell us that you do not want to be contacted for any of these purposes then we will of course respect that.

If you wish to make a donation, particularly a donation of a substantial value, we may need to verify your identity and / or carry out financial due diligence on you. This may involve taking and retaining copies of your identification documents and obtaining your personal data from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Rightmove, Business Week and related media articles. This is to comply with our legal obligations.

We may take photographs or videos of you to use in our publicity or on our social media platforms and website. If we consider that the photo or video is more privacy intrusive then we may speak to you about it first.

How and why does the School share your personal information with third parties?

- If you use a third party platform to donate then we will receive information about you from them.
- If you attend one of our events, then we will share your information with event booking platforms.
- In accordance with our legal obligations, we will share information with government and regulators such as local authorities, the Independent Schools Inspectorate and the Department for Education, for example, where we have any safeguarding concerns.
- On occasion, we may need to share information with the police for the prevention and investigation of crime and the prosecution of offenders.

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- We may also need to share information with our legal advisers for the purpose of obtaining legal advice.
- We will need to share information if there is an emergency, for example, if you are hurt whilst on School premises or at one of our events.
- We will share information with HMRC in connection with Gift Aid claims.
- We use contractors to help us with our work (e.g. a printing company for our literature) or where we store our database in the cloud.
- As a not-for-profit school that raises money for strategic initiatives, we undertake in-house research and from time to time engage specialist agencies, such as Prospecting for Gold, to gather information about you from publicly available sources, for example, Companies House, the Electoral Register, company websites, 'rich lists', social networks such as LinkedIn, political and property registers and news archives. Once we have collected this public information, we may choose to save relevant information such as your education and career history on our secure internal database. This helps with our fundraising approaches, enables us to offer careers and mentoring to students and alumnae, helps us find speakers and gives us the opportunity to create communities of interest with our alumnae. We may also carry out prospect research using publicly available information to identify individuals who may have an affinity to our cause but with whom we are not already in touch. From time to time, we will expedite this prospect research using a process known as 'wealth screening'. This process involves the School submitting identifying information about a large number of data subjects held on our database to specialist third-party partners to see whether they can match the record we hold with the publicly available information they hold on the data subjects. This research helps us to understand more about you as an individual so we can focus conversations we have with you about fundraising and volunteering in the most effective way, and ensure that we provide you with an experience as a donor or potential donor which is appropriate for you. If you would prefer us not to use your data in this way, please email us at development@channing.co.uk or call us on 020 340 2328 and ask for the Development Office.

Our lawful bases for using your information

This section contains information about the legal basis that we are relying on when handling your information.

<i>Legitimate interests</i>

The Alumnae and Development Manager and the Director of Communications, Marketing and Development monitor this policy regularly. It is updated at least every two years.

This means that we are using your information when this is necessary for our legitimate interests, except when your interests and fundamental rights override our legitimate interests. We rely on legitimate interests to use your information for all of the purposes described above unless consent applies (in which case see below). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the School and members of the School community, such as current and former pupils and parents;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for a bursary fund or new buildings;
- using your personal information to administer our events;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you arrange work experience or mentor a pupil; and
- ensuring that we comply with our legal obligations.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Alumnae and Development Manager.

Public task

We rely on this basis (as well as legitimate interests) where we use personal data in order to look after those we are responsible for. For example, if we needed to carry out checks on someone before allowing them to mentor our pupils.

Consent

In some cases, we are processing your personal information because you have given us your consent to do so.

If we ask for your consent to use your personal information you can take back this consent at any time. Any use of your information before you withdraw your consent remains valid. To withdraw your consent please contact Alumnae and Development Manager at alumnae@channing.co.uk.

Necessary for a contract

We will need to use your information in order to perform our obligations under a contract with you, for example, we need your name and contact details so that we can send you tickets for a concert that you want to attend.

Legal obligation

On some occasions we will need your information to comply with a legal obligation. For example, we may need to keep a record of who is attending an event so that we can comply with our health and safety obligations.

Vital interests

For example, to prevent someone from being seriously harmed or killed.

Sending your personal data to other countries

When the School sends personal data outside of the UK, we have to consider if the other country has the same level of protection for personal data as there is in the UK. Some countries are considered by the UK Government to have adequate rules and this includes all of the European Union and some other countries, such as, New Zealand, Norway, Switzerland and Argentina.

The School sends your personal data to countries with adequate rules when we:

- gather data on ToucanTech which stores your personal data on servers in Rep. Ireland.

When appropriate we will provide you with additional details about where we are sending your personal data, whether the country has an adequacy finding and if not the safeguards which we have in place outside of this privacy notice. If you would like more information about the safeguards that are in place please contact the Alumnae and Development Manager.

For how long do we keep your information?

We have an ongoing relationship with you and we would like you to be involved with the School for many years to come. For this reason, the Alumnae and Development Office keeps the majority of the personal data it holds about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. Similarly we will retain information about your involvement with the School as this helps us tailor our communications to you both now and in future.

We will also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in the future. We also

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keep some information indefinitely for archiving purposes (this is known as "archiving in the public interest" under data protection law) and for historical research purposes. This includes the School's legitimate interests in research; supporting long-term accountability; enabling the discovery and availability of the School's and the wider school community's identity, memory, culture and history; enabling the establishment and maintenance of rights and obligations and of precedent decisions; educational purposes; and commercial and non-commercial re-use. For example, we keep some old photos so that we have a record of what the School was like in the past. Information held in our archive may be made publicly available but this would only be done in compliance with data protection laws.

The School will also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed for marketing, development or fundraising purposes. This is especially relevant to former staff, pupils and parents. For more information on how personal data is used by the School more widely please see our policy on data retention.

Although the Alumnae and Development Office keeps the majority of your personal data for a very long time, there are some exceptions to this. Further information can be found in our policy on data retention.

What decisions can you make about your information?

- *Correction:* if information is incorrect you can ask us to correct it.
- *Access:* you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to.
- *Deletion:* you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information.
- *Portability:* you can request the transfer of your information to you or to a third party in a format that can be read by computer in certain circumstances.
- *Restriction:* you can request that we restrict how we use your personal data.
- *Object:* you may object to us using your information where:

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- we are using it for direct marketing purposes (e.g. to send you the School magazine);
- the lawful bases on which we are relying are legitimate interests or public task. Please see the section "Our lawful bases for using your information" above;
- we are using it for historical or scientific research purposes or archiving purposes. For example, we may keep photographs of your class for historical reasons.

The Alumnae and Development Manager can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to them at Channing School, The Bank, London, N6 5HF. Please note that these rights do not apply in all cases and are subject to exemptions.

Further information and guidance

The Bursar is the person responsible at our School for managing how we look after personal information and deciding how it is shared in relation to fundraising and development. In undertaking this role he is supported by the Alumnae and Development Manager.

Like other organisations we need to keep your information safe, up to date, only use it for what we said we would, destroy it when we no longer need it and most importantly - treat the information we get fairly.

If you fail to provide certain information when requested, we may not be able to provide the information or service you have requested. We may also be prevented from complying with our legal obligations.

This notice is to explain how we use your personal information, however we can answer any questions you may have.

You have a right to lodge a complaint with the Information Commissioner's Office - ico.org.uk. If you do have any concerns about how we have handled your personal data we would kindly ask that you contact the Alumnae and Development Manager or Bursar in the first instance before you speak to the ICO so that we have an opportunity to put things right.