

The Independent Educational Association Ltd.



Fundraising and development privacy notice

St James Schools

November 2018

Fundraising and development privacy notice

How we use your information

Introduction

This notice explains **how** and **why** the 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 Bursar whose contact details are: William Wyatt, thebursar@stjameschools.co.uk or 0207 348 1700. If the Bursar is not available, you can contact the Development Office on 020 7348 1789, k.brown@stjameschools.co.uk, St James Schools, Earsby Street, London W14 8SH in relation to any of the matters set out in this document.

This privacy notice applies to all of the St James Schools being St James Junior School, St James Senior Girls' School, and St James Senior Boys' School.

Each of the St James Schools is operated by the Independent Educational Association Limited. This means that the Association is ultimately responsible for how each of the St James Schools uses personal information. To use data protection terminology, the Association is the "data controller". A reference to "we" or the "Schools" in this notice is therefore a reference to the Association.

The Schools and the Development Office operate the 7th Form, a group run for the benefit of former pupils of the Schools. The 7th Form is part of the Schools and this notice also covers how the Schools use personal information in connection with 7th Form activities as well.

This notice just covers how the Schools use your personal data for fundraising and development purposes. For more information about how the Schools use 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.

What is personal information?

Personal information is information that identifies you as an individual and relates to you.

This includes your contact details, your relationship with the Schools and financial information.

What personal information do the Schools hold about you and how is this obtained?

We receive information about you from other teams within the Schools but only where this is relevant to our work. We hold a specific database with information about alumni, parents, staff, former parents, former staff and other supporters.

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 request to attend events.

In addition, we may obtain your information from other sources including LinkedIn, Zoopla, Bloomberg, Facebook, Twitter, Instagram and media articles.

We will hold information such as:

- the dates when you or your child attended the Schools (if applicable);
- if you are a former staff member the dates when you worked at the Schools;
- your contact details;
- information about your achievements and interests e.g. which 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 e.g. if you have spoken at an event or offered mentoring to pupils;
- records of any donations;
- your Gift Aid status if applicable;
- information from articles in the media and on social media;
- 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.
- if you are an alumni of the Schools examples of events that we would like to inform you about include: alumni functions, alumni sports matches such as hockey and cricket, the Christmas fair and the St James Schools Dog Show.
- if you are a current parent examples of events that we will inform you about include: our Christmas fair, school quizzes, the fun run and arts fairs.
- to facilitate interaction between members of the School community for example, we provide the ability for our alumni to communicate via our Facebook, Instagram and Twitter pages and our Toucan Tech portal / website. These can be found here :
www.facebook.com/stjamesseventhform , www.instagram.com/stjamesseventhform,
<https://twitter.com/FormSeventh>, www.alumni.stjamesschools.co.uk;
- to tell you about products sold to benefit the Schools such as clothing, mugs and sports goods;
- to keep you informed about what is happening at the Schools, for example, by emailing you our monthly newsletter called the 7th Form News;
- in connection with providing financial support to the Schools (including making donations to the Schools, specific campaigns, such as for a new sports centre, and requests for sponsorship); and

- in connection with the other ways in which you might support the Schools (such as when you volunteer).

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. 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 in line with the charity's Gift Acceptance Policy and to meet money laundering regulations. This may involve taking and retaining copies of your identification documents and obtaining your personal information from the following sources: internet search engines, 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

We will take photographs or videos of you to use in our publicity or on our social media platforms and website.

We may use your personal information to understand your interests, wealth and capacity to support our fundraising campaigns. We may use the following information for this purpose: your postal address, history of giving.

We may screen the details we have for you against third party databases so that we can check that we have up-to-date contact details for you.

As a fundraising organisation, 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.

We may also carry out 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. 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.

We may also carry out wealth screening to fast track the research using our trusted third party partners. You will always have the right to opt out of this processing.

If you would prefer us not to use your data in this way, please email us at k.brown@stjameschools.co.uk or call us on 020 7348 1789.

How and why do the Schools share your personal information with third parties?

- We use JustGiving as our platform for receiving your donations. We will therefore receive information about you from our JustGiving page.
- If you attend one of our events, then we will share your information with event booking platforms such as Toucan Tech and Eventbrite.
- In accordance with our legal obligations, we will share information with local authorities, the Independent Schools Inspectorate / Ofsted 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.
- 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 one of the Schools' premises or at one of our events.
- 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.

The Schools share information about you to facilitate the ongoing running of the 7th Form. This is explained in more detail above.

Our legal bases for using your information

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

Legitimate interests

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 any of the alternative bases in the table below apply. Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the Schools and members of the School community, such as current and former pupils and parents;
- promoting the objects and interests of the Schools. This includes fundraising e.g. if we want to raise money for the 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 to 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 Bursar.

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 the Bursar at thebursar@stjamesschools.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 an event 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.

The Schools must also comply with an additional condition where they process special categories of personal information. These special categories are as follows: personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic information, biometric information, health information, and information about sex life or orientation.

The Schools' bases for processing special personal information will depend on the circumstances:

Vital interests:

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims:

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

These two conditions may also apply if we ever need to process information about criminal convictions and offences.

Substantial public interest

The Schools are also allowed to use special categories of personal information where doing so is necessary in the substantial public interest. This will apply if we need to use special category data in connection with your attendance at one of our events. For example, if we need to make adjustments because of a disability you have.

Sending your information to other countries

We may send your information to countries which do not have the same level of protection for personal information as there is in the UK. For example, we may store your information on computer servers based overseas.

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: https://ec.europa.eu/info/law/law-topic/data-protection/data-transfers-outside-eu/adequacy-protection-personal-data-non-eu-countries_en

If the country that we are sending your information to is not on the list, or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland), then, in the absence of any other safeguards, it might not have the same level of protection for personal information as there is in the UK.

Where appropriate we may put in place additional safeguards, for example, if we are using a third party to process a payment then we may ask them to contract with us using model data protection clauses provided by the European Commission in the absence of any other appropriate safeguard. If you would like more information about the safeguards that are in place please contact the Bursar.

For how long do we keep your information?

We will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you.

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 will keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the Schools.

The Schools will also keep information for a long time as part of their 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 information is used by the Schools more widely please contact the Bursar.

Our information and records retention policy sets out how long we keep different types of information. Please click on this link <https://www.stjamesschools.co.uk/seniorgirls/wp-content/uploads/sites/3/Parent-Privacy-Notice.pdf> to view a copy of our retention policy which sets out how long we keep information for.

What decisions can you make about your information?

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- **Rectification:** if information held about you by the Schools 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:** our use of information about you may be restricted to simply storing it in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy.
- **Object:** you may object to us using your information where:

- we are using it for direct marketing purposes (e.g. to send you the 7th Form Newsletter);
- the legal basis on which we are relying is legitimate interests. Please see the section "Our legal 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 Bursar can give you more information about your data protection rights. To exercise any of your rights you can submit your request in writing to the Bursar, William Wyatt, thebursar@stjameschools.co.uk or 0207 348 1700.

Further information and guidance

The Bursar is the person responsible at our schools for managing how we look after personal information and deciding how it is shared in relation to fundraising and development.

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.

This notice is to explain how we use your personal information. The Bursar can answer any questions which you may have.

Please speak to the Bursar if:

- you object to us using your information for marketing purposes e.g. to send you information about fundraising events. We will stop using your information for marketing purposes if you tell us not to; or
- you would like us to update the information we hold about you.

If you consider that we have not acted properly when using your personal information you can contact the Information Commissioner's Office - ico.org.uk.