

WARWICK INDEPENDENT SCHOOLS FOUNDATION

Author	Phillip Rothwell, Foundation Director of Development
Version	1
Date of Approval	2022
Review	Principal's Group
Next Approval	2024

PARENTS, ALUMNI, FRIENDS AND SUPPORTERS

FUNDRAISING AND DEVELOPMENT PRIVACY NOTICE

How we use your information: Fundraising and development privacy notice

Introduction

Our relationship with our parents, alumni, friends and supporters, and our respect for their privacy and data security, is of great importance to the Warwick Independent Schools Foundation. We also value the philanthropy and generous support of those who are committed to our academic mission and charitable objects.

This notice explains **how** and **why** the Foundation 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 Foundation Director of Development, Phillip Rothwell, whose contact details are **p.rothwell@warwickschools.co.uk** or **01926 776402**. If the Director of Development is not available, you can contact the Development Office on 01926 735400, **development@warwickschools.co.uk** and Warwick Independent Schools Foundation, Myton Road, Warwick, CV346PP in relation to any of the matters set out in this notice.

The Warwick Independent Schools Foundation is governed by this Fundraising and Development Privacy Notice. Our Foundation community comprises the separate school communities of King's High School, Warwick Preparatory School, Warwick School, Warwick Junior School, and The Kingsley School, which are all governed under the same policy. Our school communities have many constituents including parents, staff, governors, alumni and friends. Pupils are not included in this privacy notice, since they are minors whose data is protected under separate policies.

- King's High School and Warwick Preparatory School includes the Landor Association, which is a community for all current and former parents,

alumnae, and friends of the school. This also includes the Old Girls' Association, which all former pupils are eligible to join. Data for these community groups is managed by the Foundation Development Office and processed in accordance with this privacy notice.

- Warwick School includes the Old Warwickian Association, which is a community for all alumni of the school which all former pupils are eligible to join. Data for the alumni association is managed by the Foundation Development Office and processed in accordance with this privacy notice.
- The Kingsley School includes an alumnae association, which all former pupils are eligible to join. Data for the alumni association is managed by the Foundation Development Office and processed in accordance with this Fundraising and Development Privacy Notice.
- King's High School has a parents' association, The King's High Association of Parents and Staff (KHAPS). Warwick Prep School has a parents' association, The Warwick Prep School Association (WPSA). Warwick School has a parents' association, the Parents' Association of Warwick School (PAWS). The Kingsley School has a parents' association, The Friends of Kingsley School. These groups are administered separately to the schools and their data processing activities are not covered by this privacy notice.

This notice only covers how the Foundation uses your personal data for fundraising and development purposes. For more information about how the Foundation uses your information more widely (for example, in relation to educating pupils) please ask the Foundation Bursar for a copy of the appropriate privacy notice. The Foundation Bursar can be contacted as follows: Mrs Victoria Espley, Warwick Independent Schools Foundation, Myton Road, Warwick, CV34 6PP, bursar@warwickschools.co.uk.

What is personal information?

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 Foundation and financial information.

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

We receive information about you from other teams within the Foundation but only where this is relevant to our work. We obtain information from school records about when you attended one of the Foundation schools, if you are a current or former parent of a pupil at our schools, and if you have interacted with our schools by attending events or volunteered for initiatives such as careers support. 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 order tickets for events.

In addition, we will obtain your personal data from other sources, which we use for the purposes described below. These are LinkedIn, 192.com, Facebook, Twitter and media articles, and members of your family or other alumni who might tell us about your interests or career.

We will hold information such as:

- your name, gender, 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 Foundation community such as other alumni;
- 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 Foundation;
- your contact details;
- information about your achievements and interests e.g. which sports team you were part of as a pupil or any hobbies that you have now;
- 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 includes correspondence with you, your attendance at our events, and whether you carry out mentoring of current pupils;
- records of any donations and your Gift Aid status if applicable;
- information from articles in the media;
- medical information or information about a disability you have, e.g. to make adjustments for you or to help you if you are hurt whilst taking part in an activity;
- any dietary requirements for catering purposes; and
- any disability which you may have so that we may make reasonable adjustments for you.

Why do we use your personal data?

We use your personal data 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 send you direct individual communications, such as birthday cards, congratulations for achievements, and other ways to maintain a meaningful, lifelong relationship;

- to facilitate interaction between members of the Foundation community. For example, we provide an online portal to allow our community to communicate. This can be found here: www.warwickfoundationconnect.com;
- to tell you about products sold to benefit the Foundation such as clothing and sports goods;
- to keep you informed about what is happening at the Foundation, for example, by sending you a copy of Foundation school newsletters, including The Old Warwickian, The Portcullis, The Ilex, The Old Girls' Association Annual Notice, The Kingsley Alumnae magazine;
- in connection with providing financial support to the Foundation (including making donations to the Foundation, specific campaigns, such as for a new sports centre, bursary appeals and requests for sponsorship);
- in connection with the other ways in which you might support the Foundation (such as when you volunteer);
- In connection with any research we carry out. For example, we may ask you to complete a survey, provide feedback or join one of our focus groups.

We will contact you for the above purposes by email, telephone, social media, 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 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 websites. If we consider that the photograph or video is more privacy intrusive then we may ask for consent first.

We will use your personal data to build up a picture of your willingness to give and how wealthy you are so that we can tailor our fundraising communications to you. As part of this we may use your personal data to help us decide how much we think you are willing and able to give. We will use the following information from sources outside the Foundation. These sources include: Zoopla (for house prices), LinkedIn, Bloomberg, The Times Rich List, Facebook, Instagram, Twitter and media articles. We will only use your personal data as we have described in this paragraph where we have your consent to do so.

We will 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 but we will not do this without getting your consent 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 provided by the school websites or externally through our database, The Raiser's Edge.
- In accordance with our legal obligations, we will share information with 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.
- We may also need to share information with our professional advisers. For example, we may share your personal data 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 Foundation 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.

Our lawful bases for using your information

This section contains information about the lawful 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 personal data for all of the purposes described except where we have asked you for your consent (in which case consent applies as the lawful basis). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the Foundation and members of the Foundation community, such as current and former pupils and parents;
- promoting the objects and interests of the Foundation. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- using your personal data to administer our events;

- safeguarding and promoting the welfare of our current and former 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 Foundation Director of Development.

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 the Foundation Director of Development, Phillip Rothwell on 01926 776402 or **p.rothwell@warwickschools.co.uk**.

Necessary for a contract

We will need to use your personal data 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 have purchased tickets for.

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

- Use our Development database, The Raiser's Edge, which stores your personal data on Azure servers based in Europe.

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 have any questions about the safeguards that are in place please contact the Foundation Director of Development.

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 Foundation for many years to come. For this reason, the Foundation 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 Foundation 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 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 Foundation's legitimate interest in research; supporting long-term accountability; enabling the discovery and availability of the Foundation'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 Foundation 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 Foundation 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 Foundation more widely please contact the Foundation Bursar at bursar@warwickschools.co.uk.

Although the Foundation Development Office keeps the majority of your personal data for a very long time, there are some exceptions to this. Please contact the Foundation Director of Development to request a copy of the Information and Records Retention Policy.

Further information and guidance

The Foundation Director of Development is the person responsible at the Foundation for managing how we look after personal data and deciding how it is shared in relation to fundraising and development. The Foundation Director of Development can answer any questions which you may have.

Like other organisations we need to keep your personal data 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.

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 us in the first instance before you speak to the ICO so that we have an opportunity to put things right.