

Fundraising and Development Privacy Notice

Introduction

This notice explains how and why the Development Office uses personal data about you when carrying out our fundraising and development activities. This notice also outlines what we do with your personal data and what decisions you can make about your personal data in relation to fundraising and development. If you have any questions about this notice, please contact the Director of Development and Alumni Relations whose contact details are: **jsmith@denstonecollege.net**. If the Development Director is not available, you can contact the Development Office on **alumni@denstonecollege.net** or 01889 590484 in relation to any of the matters set out in this notice.

The Development Office is a department that is part of Denstone College (Charity Number 1102588). The Development Office is a 'data controller' or 'controller'. The Development Office has implemented internal procedures that ensure your data is used principally for the benefit of the School you, or your children, attended. This is managed day-to-day by the Development Office. The Development Office is responsible for development and fundraising for Denstone College.

This notice only covers how the Development Office uses your personal data for fundraising and development purposes. For more information about how Denstone College and the Development Office uses your personal data more widely see the Denstone College website for the appropriate Privacy Notice.

This document sets out the principles under which the College will seek to operate when undertaking its fundraising activities. It reflects Denstone College's commitment to implementing, as far as possible, best practice in its fundraising activities, and is in line with the current guidance provided by The Fundraising Regulator. <https://www.fundraisingregulator.org.uk/code>.

Guiding Principle

Our fundraising approach is to act fairly, transparently, and ethically in the best interests of serving the College's charitable objectives and those in our community. Above all, we value most highly the relationships we have with members of the Denstone College community, including current pupils and parents, alumni and former parents, staff, friends of the College and more widely. We will seek at all times to protect our relationship with our supporters and in doing so to treat them with respect and integrity. The College believes and maintains the principle that, wherever possible, all gifts should be made:

- Without coercion and as an informed decision.
- With full transparency and agreement regarding the use of the gift by the College.
- In full confidence that the donor will be acknowledged and recognised as they wish.



Solicitation of Donations

1. The College is registered with the Fundraising Regulator and adheres to the Code of Fundraising Practice. All staff involved in fundraising should read and be familiar with those parts of the Code which are relevant to their work.
2. Fundraising solicitations on behalf of Denstone College will:
 - be truthful;
 - accurately describe the Development Office's activities and intended use of donated funds;
 - respect the dignity and privacy of those who benefit from the Development Office activities.
3. The College's Development Office will obtain the written permission of all persons mentioned in case studies and other promotional material (including photographs) prior to publication.
4. Volunteers, staff and contractors who solicit or receive funds on behalf of the College shall:
 - adhere to the provisions of this code;
 - act with fairness, integrity and in accordance with all applicable laws;
 - cease solicitation of a prospective donor who identifies solicitation as a harassment or undue pressure;
 - disclose to the Chair of the Development Committee any actual or apparent conflict of interest;
 - not accept donations for purposes that are inconsistent with the College's objectives or mission.
 - adhere to the provisions of applicable professional codes of ethics and standards of practice meeting the requirements of the Charity Commission, the ICO, the Fundraising Regulator and other regulatory bodies;
5. Paid fundraisers, whether staff or consultants, will be compensated by a salary, retainer, or fee, and will not be paid finders' fees, commissions or other payments based on either the number of gifts received, or the value of the funds raised. Compensation policies for fundraisers, including performance-based compensation practices (such as salary increases or bonuses) will be consistent with the College's policies and practices that apply to non-fundraising personnel.

Acceptance of Donations

All gifts given for a restricted purpose will be received and used solely for the purpose agreed between the donor and the College. Some gifts are unrestricted and are therefore spent at the College's discretion. The full value of every gift (including gift aid if applicable) is used for the charitable purposes of the College.

The Governing Body of the College may decide to refuse the offer of a donation because the purpose of the donation does not match its fundraising objectives or if there is doubt about the appropriateness or legality of the source. Should a donation be refused for any reason, records will be kept to indicate why it was refused and any such refusal will be couched in appropriate language so that it does not cause offence.



In no circumstances will a gift be accepted where the donor expects a place or position at the College to be offered, and in no circumstances will such a place or position be offered in recognition of a donation.

Key criteria for accepting gifts are:

- all gifts adhere to the College's aims in ways which meet their objectives and are productive and reasonable;
- the gift is applied for the purpose for which it was donated and meets the donor's wishes;
- the source of the donation is morally acceptable to the College, in line with the College's aims and objectives and values;
- the completion of the project for which donations are accepted should be achieved. If the project is not completed or there are excess funds, then by law (and morally) the gift should be returned to the donor unless they agree to change the purpose of their donation;
- all gifts are accepted as voluntary contributions and not in lieu of tuition or other fees;
- the decision of a parent/guardian to make or not make a gift to the College will have no bearing on the academic, sporting or extracurricular opportunities open to an individual pupil.

The College will only decline a donation if it is felt that the gift:

- would impair the Development Office in fulfilling its objectives, particularly with respect to supporting the College;
- is damaging to the objectives of the College, its agreed policies or its beneficiaries;
- consists of goods, property, or services which the College cannot lawfully use, convert, sell or exchange in direct support for its charitable aims;
- is dependent on the fulfilment of unacceptable conditions applied by the donor, for example if Council believed such conditions would place the assets of the College in undue or inappropriate risk;
- may require action that is potentially illegal;
- could seriously damage the reputation of the College;
- creates a serious conflict of interest;
- involves a suspicious transaction;
- involves the acceptance of funds from proscribed organisations, designated individuals or sanctions targets;
- harms the College's relationships with stakeholders (e.g. donors, alumnae, parents, staff, pupils etc.).

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, Companies House, zoopla, Business Week, and related media articles. This is to comply with our legal and ethical obligations. We may also seek to use a third party to perform due diligence checks on donations.

Gift Aid and Tax Efficient Giving

The College does not attempt to claim gift aid on any donations which do not meet HMRC guidance, but it is committed to reclaiming gift aid on all gifts made by UK taxpayers where a Gift Aid Declaration has

been made. To that end, every acknowledgement letter to a donor who has gift-aided his/her gift serves as a receipt for tax purposes. Donors may be provided with a schedule of their donations during the course of a tax year to assist with their income tax returns, if they request this information.

Handling of Donations

In line with the Fundraising Regulator best practice, cash and cheques are banked at the earliest possible opportunity. Cash and cheques that have not yet been banked are stored securely. Charity vouchers such as those made through the Charities Aid Foundation (CAF) are sent to CAF to be processed and the money is passed to the Development Office by bank transfer. Donations of shares are co-ordinated between the donor and the Bursar.

Acknowledgement, Recognition and Stewardship

Denstone College is committed to the public and private recognition of its donors where it is desired. Each donor can expect to receive a formal and personalised letter from the Head or the Development Office. Other forms of recognition are offered in line with the value of the gifts, such as an invitation to visit and named plaques at the College.

Financial Accountability

The registering of donations and maintaining of the Development Office budget will be overseen by the Development Director in collaboration with the Finance team. All financial matters will be conducted in a responsible manner, consistent with the ethical obligations and the legal requirements of the Charity Commission.

All donations will be used to support the objectives of Denstone College.

All donations given for specific purposes will be applied in accordance with a donor's wishes. If necessary due to programme or organisational changes, alternative uses will be discussed where possible with the donor or the donor's legal representative.

Annual financial reports will:

- be audited as part of Denstone College's accounts;
- be factual and accurate in all material respects;
- disclose the total amount of fundraising expenses;
- identify government grants and contributions separately from other donations;
- be prepared in accordance with generally accepted accounting principles and standards;

Data Protection

We are strongly committed to protecting your data and all data will be processed in compliance with the UK GDPR and The Data Protection Act 2018. For further information please see our [Denstone College Privacy Notice](#).



Key data protection terms used within this policy are explained in our [Data Protection Policy and Procedure](#).

What Personal Data Do We Hold About You and How Is This Obtained?

If you or your child attended Denstone College, we receive information about you from the Admissions team within the School but only where this is relevant to our work. We obtain information from the Admissions team about the dates when you or your child attended the School (including your child's name) and also your address, phone numbers and email addresses. 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 other people who are involved in our development activities; for example, members of your family and other alumni might tell us about your interests or your career. If you were, or are, a member of the Old Denstonian Club, we might have received information about you from them as follows: name, previous names, dates at the School, contact details, records of your communication and/or donation history, career information, and records of your links within our community, such as siblings, friends or partners.

We will hold information such as:

- Your name, gender, date of birth and any previous names you have used.
- 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 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 School.
- 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 are a member of our careers network.
- Records of any donations and your Gift Aid status, if applicable. This may include banking information if you have made gifts by direct debit.
- Information from articles in the media.
- Medical information or information about a disability you have, e.g. to make reasonable adjustments for you at an event or to help you if you are hurt whilst taking part in an activity.
- Any dietary requirements for catering purposes.

Your personal data is held on the Development Office database, powered by Potentiality, and will only be shared with other College departments if there is a good reason to do so, for example, if we are helping other departments to reach out to a specific individual. The privacy of donors and prospective donors will be respected.

Any donor records that are maintained by the College's Development Office will be kept secure using appropriate technical and organisational measures.

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 facilitate interaction between members of the School's community, for example, taking part in our Careers Network.
- To tell you about products sold to benefit the School such as clothing and sports goods.
- To keep you informed about what is happening at the School, for example, by sending you a copy of Denstone College publications such as The Denstonian, or alumni publication, The Chronicle.
- In connection with providing financial support to Denstone College (including making donations to specific appeals, such as projects).
- In connection with the other ways in which you might support us (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 or committees.

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.

Denstone College uses images and videos of pupils, staff, and on occasions, parents, alumni, and those that attend our events. These are used in a wide range of School media e.g. our website, social media and publications. We will take steps to ensure that all images are used solely for the purposes they are intended in line with our College policies. If we consider that the photo or video is more privacy intrusive then we may ask for consent first.

We will never sell any data to a third party, nor will we share any personal data pertaining to existing and prospective donors, other than with approved representatives of the College who are involved in activities relating to data analysis and/or data correlation for administrative purposes and fundraising feasibility analysis, and this will always be protected by full compliance with the data protection legislation.

We will use your personal data 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 for this purpose: your name, age, postal address, career information and history of giving. We will also obtain information from sources outside the School. These sources are as follows: zoopla (for house prices), LinkedIn, Companies House, public websites such as your company's website, or media outlets. This is called "Wealth Profiling". We may also use trusted third parties to automate this work. This is called "Wealth Screening". Wealth Screening is a tool which helps us to understand how to approach you about fundraising and volunteering opportunities in an appropriate way. It also enables us to generate income more cost-effectively, for the benefit of the pupils of Denstone



College. We will never use any information about your political opinions, religious beliefs, ethnic origin or health. You can contact us at any time to request that your data is not used for Wealth Profiling and / or Wealth Screening. Please contact the Development Director to make this change: (jsmith@denstonecollege.net).

Our Lawful Bases for Using Your Information

Our lawful basis for processing your information is covered on our Data Protection Policy; however, we have included further details below about our processing under legitimate interest.

Legitimate Interests

This means that we are using your personal data 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 School and members of the Schools' 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 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 personal data where we are relying on our legitimate interests as explained above, please speak to the Development Director.

Consent

In some cases, we are processing your personal data because you have given us your consent to do so. If we ask for your consent to use your personal data you can withdraw this consent at any time. There will always be the option available to opt out of fundraising communications, and appropriate wording and notification will be made clearly on all fundraising materials, however presented. Any use of your personal data before you withdraw your consent remains valid. To withdraw your consent please contact the Development Director on 01889 590484 (ext 4061) or jsmith@denstonecollege.net. Your request will be actioned as soon as reasonably possible.

For How Long Do We Keep Your Information?

We have an ongoing relationship with you and we would like you to be involved with us for many years to come. For this reason, we keep the majority of the personal data we hold about you indefinitely. For example, we keep your contact details so that we can continue to stay in touch with you. 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. 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. Our Records Management and Retention Policy sets out how long we keep different types of information. Please contact the Development Office to view a copy of this policy.

What Decisions Can You Make About Your Information?

Data protection law gives you a number of rights regarding your information. Your rights can be found in our Data Protection Policy. Donors and prospective donors have the right to see their own records and to challenge their accuracy. To exercise any of your rights you can speak to the Development Director jsmith@denstonecollege.net or by phone 01889 590 484.

If you have any concerns about how your personal data has been handled, we would kindly ask that you contact us in the first instance so that we have an opportunity to investigate this for you. You do have a right to lodge a complaint with the Information Commissioner's Office - ico.org.uk should you need to.

Serious Incident Reports

The College is committed to reporting serious incidents to the Charity Commission. A serious incident is an adverse event, whether actual or alleged, which results in, or risks, significant:

- loss of a charity's money or assets;
- damage to a charity's property;
- harm to a charity's work, beneficiaries or reputation.

Examples of serious incidents which could arise in connection with fundraising include:

- Suspicions or allegations of criminal activity including theft, fraud, bribery and money laundering.
- Suspicious financial transactions, suspicious or unverified donors particularly if the donation or series of donations totals £25,000 or more.
- Circumstances in which a report has to be made to the Information Commissioner's Office.
- Links to terrorism through donors.
- Investigation by the police or another regulator, significant adverse findings by a regulator, or significant penalty from a regulator.
- Harm to beneficiaries or donors / the public.
- Circumstances attracting negative media attention or adversely affecting the College's Reputation.

If staff or volunteers believe there may have been a serious incident, they must immediately inform their line manager and the Development Director. The Development Director shall apply the procedures of the College for the consideration, management and reporting of serious incidents. Staff or volunteers may in addition report serious incidents using the whistleblowing policies of the College.

Our Fundraising Complaints Procedure

We have a dedicated procedure for responding to any complaints about our fundraising. We will acknowledge all complaints (if made in writing) within five working days, and give a more detailed response (if needed) within 20 working days.



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We are usually able to resolve any concerns, but if you are not entirely happy with the way we have handled yours, you can make a further complaint to the Head of Denstone College or to the Fundraising Regulator.

We value your feedback. If you have any questions or concerns, please contact us:

Telephone: (9.00am-5pm, Monday to Friday) 01889 590484

Letter: The Development Office, Denstone College, Uttoxeter, Staffordshire, ST14 5HN

Email: jsmith@denstonecollege.net.

Please see Appendix 1 for our fundraising promise.



Appendix 1

Denstone College's Fundraising Promise

We should always treat our supporters and potential supporters with respect and integrity which is why we will always take any concerns about the way we work seriously.

Our fundraising promise to you:

- We are committed to high standards.
- We are honest and open.
- We are clear.
- We are respectful.
- We are fair and reasonable.
- We are accountable.

We are determined not to let you down but mistakes can happen. If you are ever unhappy with anything we have done whilst fundraising, please tell us. We will do our very best to investigate your complaint and resolve it swiftly.