

Fundraising and Development

Document information

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Adopted by {Academy Name} following consultation process by Local Academy Committee on:			
Purpose	The Trust is responsible for how your personal data is used under data protection law.		
This policy links to:	GDPR		

If you would like this information in another language or format, please speak to the Trust HR Operations team.

Phone: 01543 622433 Option 4

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How We Use Your Personal Data: Fundraising and Development Privacy Notice

1.0 Introduction - What is personal data?

Brewood and Wheaton Aston Federation (Brewood CE Middle & St Mary's CE First Academies) are part of St Chad's Academies Trust. St Chad's Academies Trust is referred to in this notice as the **Trust** or **we**. The Trust is responsible for how your personal data is used under data protection law.

This notice explains **how** and **why** the Academy Trust collects and uses your personal data when carrying out our fundraising and development activities. This notice also outlines what **decisions** you can make about your personal data in relation to fundraising and development.

Our Data Protection Officer can be contacted at lea.millinchip@stchads.uk

The St Mary's CE First Academy PTA is independent from the Trust.

This notice only covers how we use your personal data for fundraising and development purposes. For more information about how the Trust uses your personal data more widely (for example, in relation to educating pupils) please ask the Data Protection Officer for a copy of the appropriate privacy notice. The Data Protection Officer can be contacted as above.

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

2.0 What personal data does the Trust hold about you and how is this obtained?

- 2.1 We receive information about you from other teams within the Trust but only where this is relevant to our work. We obtain information about the dates when you attended the Academy and also achievements within the academy.
- 2.2 We hold a specific database with information about former pupils, parents, staff, former parents, former staff and other supporters.
- 2.3 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.
- 2.4 In addition, we will obtain your personal data from other sources, which we use for the purposes described below. These are others who are involved in our development activities, for example, other members of your family and other former pupils might tell us about your interests or your career.
- 2.5 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 one of our academies.
 - Any connection you may have with other members of our community such as other former pupils.

- The dates when you or your child attended one of our academies (if applicable)
- If you are a former staff member the dates when you worked at one of our academies or Trust central office.
- 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.
- 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.

3.0 Why do we use your personal data?

3.1 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 our community
- To tell you about products sold to benefit the Trust such as clothing and sports goods.
- To keep you informed about what is happening at the Trust, for example, by sending you a copy of the newsletter.
- In connection with providing financial support to the Trust (including making donations to the Trust, specific campaigns, such as for a new sports centre, and requests for sponsorship).
- In connection with the other ways in which you might support the Trust (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 a focus group.

3.2 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.

3.3 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, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

- 3.4 We will take photos 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. Please see the Guidance on the Use of Photos and Videos for information about the data protection obligations when using images.

4.0 How and why does the Trust share your personal data with third parties?

- If you use a third-party platform to donate, then we will receive information about you from them.
- In accordance with our legal obligations or public tasks, we will share information with government and regulators such as local authorities, Ofsted, the Education and Skills Funding Agency 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 advisors. 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 Trust 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.

5.0 Our lawful bases for using your information

This section contains information about the lawful bases that we are relying on when handling your information. 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 in this notice except where we have asked you for your consent (in which case consent applies as the lawful basis) or where we are relying on public task as our lawful basis (see below). Specifically, we have a legitimate interest in:

- ensuring that there is an active community of supporters which will benefit the Trust, our schools, and members of our community, such as current and former pupils and parents.
- promoting the objects and interests of the Trust. This includes fundraising e.g. if we want to raise money for 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 Data Protection Officer.

Public task

We rely on this basis where we use your personal data for educating, or safeguarding and promoting the welfare of our current and former pupils e.g. if you arrange work experience or mentor a pupil.

If you object to us using your information where we are relying on public interest task as explained above, please speak to the Data protection Officer.

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 take back this consent at any time. Any use of your personal data before you withdraw your consent remains valid. To withdraw your consent please contact the Data Protection Officer at lea.millinchip@stchads.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 personal data 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.

6.0 Sending your personal data to other countries

- 6.1 If the Trust 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, Argentina, New Zealand, Norway and Switzerland.
- 6.2 The Trust does not send your data outside of the UK
- 6.3 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 where applicable.
- 6.4 If you have any questions about the safeguards that are in place, please contact the Data Protection Officer.

7.0 For how long do we keep your information?

- 7.1 We have an ongoing relationship with you, and we would like you to be involved with the Trust for many years to come. For this reason, the Trust 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 Trust as this helps us tailor our communications to you both now and in future.
- 7.2 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.
- 7.3 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 Trust's legitimate interests in research; supporting long-term accountability; enabling the discovery and availability of the Trust's and the wider Trust 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 Trust 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.

- 7.4 The Trust 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 Trust more widely please contact the Data Protection Officer.

Although the Trust 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 Information and Records Retention Policy.

8.0 What decisions can you make about your information?

- 8.1 **Correction:** if information held about you by the Trust is incorrect or incomplete you can ask us to correct it.
- 8.2 **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 who we have sent it to.
- 8.3 **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.
- 8.4 **Portability:** you can request the transfer of your personal data to you or to a third party in a format that can be read by computer in certain circumstances.
- 8.5 **Restriction:** you can request that we restrict how we use your personal data.
- 8.6 **Object:** you may object to us using your personal data where:
- we are using it for direct marketing purposes (e.g. to send you an email about a fundraising opportunity);
 - the lawful bases on which we are relying is legitimate interests or public task. Please see the section "Our lawful bases for using your information" above; and
 - if we ever use your personal data for scientific or historical research purposes or statistical purposes.
- 8.7 The Data Protection Officer can give you more information about your data protection rights. To exercise any of your rights you speak to the Data Protection Officer at lea.millinchip@stchads.uk Please note that these rights do not apply in all cases and are subject to exemptions.

9.0 Further information and guidance

- 9.1 The Data Protection Officer is the person responsible at our Trust for managing how we look after personal data and deciding how it is shared in relation to fundraising and development. The Data Protection Officer can answer any questions which you may have.
- 9.2 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.

- 9.3 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.
- 9.4 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.