



Camphill School Aberdeen

Communications and Fundraising Privacy Policy

1. Introduction

At the heart of Camphill School Aberdeen's ethos is treating each person with integrity, dignity and worth. This is the bedrock for all aspects of our work, including raising funds.

Camphill School Aberdeen (CSA) is committed to protecting the privacy of its supporters and will adhere to the standards set out in the Code of Fundraising Practice.

We keep our Privacy Policy under regular review and may update it at any time.

2. When We Collect Personal Information

We will collect personal information when you support, demonstrate interest or there is research to believe that there is potential to show interest in CSA in one of the following ways:

- Make a donation.
- Can authorise another party's donation.
- Volunteer.
- Take part in a personal challenge.
- Organise an event.

3. What Personal Information We Collect

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

The information we collect can include:

- Full name.
- Contact details (email address and telephone number – both work and home if provided).
- Interactions with CSA e.g. meetings, visits, emails, phone calls, attendance at our events.
- Donation history (donation amount, purpose, date, payment method, donation reason).
- Gift aid declaration (including your tax status).
- Details of relationships between you and other supporters, families/residents, staff and other CSA contacts.
- Your communication preferences.
- Personal areas of interest and philanthropic interests – both information that you have shared with us and in some circumstances through publicly available online sources through either in-house or third-party research.
- Photographs taken with your consent during an event.

The type of information collected will depend if and how you are supporting CSA. In line with UK GDPR, you can request a copy of your personal information that is held by CSA. See section 9 below.

- We also collect the following special categories of data about you: Health issues we need to be aware of when attending our events, including emergency contact details.
- Dietary requirements when attending our events.

Where we need to collect personal data by law, or under the terms of a contract we have with you, and you fail to provide that data when requested, we may not be able to perform the contract we

have or are trying to enter into with you. In this case, we may have to cancel a product or service you have with us but we will notify you if this is the case at the time.

4. Why We Collect Your Information

We collect your personal information and use it where the law allows us to. Most commonly, we will use your personal data in the following circumstances:

- to adhere to statutory/ legal obligations;
- where we need to perform the contract we are about to enter into or have entered into with you;
- where it is necessary for our legitimate interests; or
- where we have your consent.

We aim to work as effectively as possible to ensure your support will make the most significant impact to the lives of children and young people at CSA. This data allows us to build relationships that are strong and mutually beneficial, and we are contacting you in a timely manner and in ways that will be of interest to you.

Personal information is reviewed to ensure it remains accurate and relevant. It is important that the personal data we hold about you is accurate and current. Please keep us informed if your personal data changes during your relationship with us.

In line with CSA's Gift Acceptance Policy, an appropriate level of due diligence reviews will be carried out before soliciting or accepting gifts in excess of £10,000, those which are associated with a naming opportunity, and/or if the source of funds is unknown. This will be carried out by our staff or a third-party to gather publicly available data, including reviewing known associations, criminal convictions and offences. A copy of the Gift Acceptance Policy is available on request from the CSA Fundraising Department by emailing fundraising@crss.org.uk.

On occasion, someone you know may inform us that you may be interested in CSA and share your name and contact details. Similarly, contact may be made following a recommendation from a CSA staff member, an employed fundraiser of CSA or a third party may identify you as a potential supporter.

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us. If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5. What Do We Use This Information For

Personal information may be used for the following purposes:

- Keep in touch with supporters regarding your gift, events and general updates that we feel would be of interest to you including fundraising and marketing communications.
- Process, acknowledge and steward gifts and other payments (including tax administration for gift aid).

- Maintain records for internal use and statutory obligations.
- Registration to events and fundraising challenges.
- Process requests for corporate volunteering.
- Conduct due diligence in line with our Gift Acceptance Policy, to reduce the risk of fraud, credit risk or reputational damage to CSA.
- Where you have given us your express consent, photographs and videos in which you appear will be used to promote the work of CSA.
- Where appropriate, identify potential donors and create Research Profiles highlighting your preferences and philanthropic interests.
- Where appropriate, create briefings which will be shared with senior staff, Board members and other appropriate individuals in advance of events/meetings that you may attend.

6. Joint Fundraising

We work in Partnership with Camphill Estates (CRSE) for fundraising Campaigns and Camphill Estates are providing fundraising and marketing support for the wider fundraising and marketing functions.

Camphill Estates (CRSE) owns the land and property of Camphill School Aberdeen (CSA) and works in partnership with CSA to help build futures for children and young people with learning disabilities and additional support needs.

CSA and CRSE will become Joint fundraising partners, with common objectives and similar charitable goals.

Current supporters and potential supporters from each organisation will be identified and placed on a central secure system hosted and managed by CRSE. This will be done in line with both organisations privacy policies which are the same. We will obtain your consent for marketing from CRSE before we add you to your joint database.

Both organisations share common Privacy Policies with respect to fundraising and marketing.

7. How We Store Your Personal Information

The information collected is stored electronically in a secure drive and in a password-protected system that is only accessible to members of staff with a legitimate reason to access this. Hard copies are only used when necessary and kept to a minimum, these are stored securely.

Relevant data is shared with external agencies when required by law e.g. auditors and HMRC. If we share data with an external third party, we ensure that appropriate data sharing agreements are in place before doing so and that partners have a legal responsibility to only use the information for the purposes for which we supply it. Examples of where we may do this include: consultants and third-party agencies that advise us on individual's' capacity to donate or potential interest in CSA, for example through wealth screening, and our service providers that we use in our usual course of business to store and send information. As mentioned in section 6, if you give us your consent we will share your information with CRSE for joint fundraising purposes.

We make every effort to keep personal information secure and the appropriate security measures are in place to attempt to protect against loss, misuse and alteration of data. While we cannot ensure or guarantee that loss, misuse or alteration of information will not occur while it is under our control, we take every step possible to prevent this.

CSA will never sell your personal information to third parties.

We will not transfer your personal data outside of the UK and EU.

8. How Long We Hold Data For

We will retain your data for as long as reasonably necessary to fulfil the purposes we collected it for, including indefinitely in support of your lifelong relationship with CSA, or until you request us to do otherwise. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

Where you exercise your right to withdraw consent for marketing or unsubscribe from our marketing communications, we will retain a core set of personal data (name and address) to ensure we do not contact you inadvertently in the future (for our suppression list). Additionally, we may keep information for longer for statutory purposes (e.g. Gift Aid, anti-fraud and auditors).

You can ask us or third parties to stop sending you marketing messages at any time. If you would like to unsubscribe from any marketing communications, please contact us.

9. Your Rights

In line with UK GDPR legislation, individuals have certain rights. Under certain circumstances you have rights under data protection laws in relation to your personal data:

- Request of access to your personal information (commonly known as a "**data subject access request**").
- Request correction of the personal data that we hold about you.
- Request erasure of your personal data.
- Object to processing of your personal data where we are relying on a legitimate interest.
- Request restriction of processing of your personal data.
- Request the transfer of your personal data to you or to a third party.
- Withdraw consent at any time where we are relying on consent to process your personal data.

If you want to exercise any of your rights, please contact us.

You will not have to pay a fee to access your personal data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we could refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it could take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

We will contact you primarily using your preferred contact method and limit the frequency of non-personalised communications wherever possible. You may opt out from receiving correspondence at any time via the contact details below.

More information on your rights can be found on the Information Commissioner's Office website – www.ico.org.uk

10. Data Protection Officer

If you wish to exercise those rights, you can contact:

Mr Alex Busch – Executive Director

Mr Martin Alfred – Safety, Community and Management Support Officer

Camphill School Aberdeen, Central Office, Murtle Estate, Aberdeen, AB15 9EP

office@crss.org.uk

01224 867935

The Executive Director, supported by the Management Team, will ensure that Procedures and Guidance are in place to give full effect to this policy.

This Policy Statement is proposed by Martin Alfred, Safety, Community and Management Support Officer, endorsed by the CSA Management Team and approved by the Board of Trustees on 02/12/2021.

Signed:



Stephen Johnston, Chairperson

Review Date: December 2022