

# **Wealth Screening in Higher Education**

#### 20 November 2017

Many of you will have already seen today's articles in the <u>Daily Mail</u> and <u>the Guardian</u> about the ICO's examination into fundraising practice within the University sector. This article does not refer to wealth screening in schools, and independent schools are currently not subject to freedom of information requests.

The Daily Mail refers to "some 24 Universities, all members of the Russell Group, which are very likely to have wealth screened supporters without their consent or without them reasonably expecting this would happen".

The Mail goes on to say that even though the Universities in question have sent alumni's data to wealth screening firms, there is no suggestion of wrongdoing by these firms, however any organisation that uses this service must clearly tell people their data will be passed on like this.

## **IDPE's position**

We know that schools take the privacy of their alumni and supporters very seriously and we encourage all members to register with the Fundraising Regulator.

Wealth screening and prospect research are lawful activities, when conducted in compliance with data protection law. Earlier this year, IDPE shared the ICO's guidance on wealth screening and prospect research following the Fundraising Regulatory & Compliance Conference.

We do recognise that schools may wish to reassure their donors and have developed some key messages for you to share with your community, on the importance of prospect research and wealth screening to schools' development.

## Why do schools carry out prospect research and wealth screening?

Schools, like charities, undertake research using publicly available information, to inform their approach to potential donors. This research helps schools to:

- **Fundraise effectively** Identifying donors who have the potential to give, and supporting the relationship building process to create a positive fundraising experience for the donor.
- **Fundraise efficiently** Through focusing attention on donors who have the potential to give, schools ensure they use their resources efficiently and protect supporters from inappropriate communication.
- Fundraise ethically Carrying out due diligence on donations and identifying the legitimacy of its source, is a legal requirement for all charitable organisations.



### What can schools do now?

- **Privacy Notice** Be transparent review your privacy notice to ensure it accurately reflects how you process personal data including any research you carry out
- **Research** Include details in your privacy notice about how you research through using publicly available information (e.g. house prices) and/or using in-house or reputable third parties to profile donors' financial capability (sometimes called 'wealth screening').
- **Evidence** Consider your lawful basis for processing personal information and whether there are circumstances when you need to gain consent. Ensure that you have a robust system in place for documenting this.
- **Engage** Keep engaging and asking your community. Continue to share the impact of donations with your school's community
- **Fundraising Regulator** If you haven't already done so register your school with the Fundraising Regulator

IDPE continues to work in with other schools' associations and legal partners to provide consistent and robust updates and guidance for schools. We let you know as soon as further information and changes to best practice are released.