

To consent or not to consent, that is the question...

The Manchester Grammar School shares their approach to consent

For the Manchester Grammar School (MGS), consent felt the most appropriate lawful basis to rely on for processing personal data of alumni, an opportunity to be transparent with their school community and to only contact alumni who want to hear from them. MGS began their campaign to acquire consent from their alumni back in Spring last year. An initial e-mail was followed by telephone and postal campaigns to encourage ‘opt in’ – of the 11,000 alumni on the MGS database, so far two thirds of alumni have provided their consent.

Find out more from Simon Jones, their Director of Development, about MGS’s consent campaign and the unexpected benefits of choosing to ‘opt in’!

The definitive guidance on consent recently published by the ICO, specifies that consent should be granular – but how granular is granular?

At MGS, we have not broken down our consent into a series of tick boxes, but we have provided granularity in clearly detailing alumni and development activity as part of our consent capture. The guidance on consent states that it must be *‘freely given, specific, informed and unambiguous’*, our consent form therefore states the benefits of being part of the MGS community, and we are transparent about the frequency of our communications and how we will engage with our alumni.

How many alumni have effectively ‘opted out’?

To date just 1.5% - whilst we want to stay in touch with all our alumni, equally we respect the privacy rights of individuals within our school community. We hope in time they will want to re-engage with the MGS community.

What will you do with any alumni who haven’t provided their consent?

To date, two thirds of our alumni have provided us with their consent, however there are still some warm alumni, in fact some donors, who have yet to consent. Undoubtedly some alumni will contact us when they realise they are no longer receiving our communications post 25 May. With alumni who have not provided consent, we intend to rely on legitimate interests and their existing relationship with MGS, to continue to store their personal data. Next year we will carry out a Legitimate Interests Assessment to consider whether we can contact them by post to remind them of the benefits of being a MGS alumnus and to request their consent.

How long will consent last? Will you renew it regularly?

We have not set a time-limit as such for renewing individual alumni consents, but instead agreed a process for reviewing our consent capture. We recognise however, if how we are processing alumni data is going to change significantly, then we will need to refresh consents.

What has been the best method(s) for capturing consent?

All our alumni are different. Our approach to capturing consent has therefore had to reflect these differences and the different communication preferences of our alumni. Working with fundraising consultants Buffalo, our initial e-mail campaign piloted an online consent form, which captured a

third of alumni immediately. More recently, telephone and postal campaigns have enabled us to reach out to other members of our community to capture their consent.

What have been the benefits of relying on consent?

Our consent campaign has actually increased engagement with our alumni – alumni have not just given us their consent, but also updated their contact details, provided new information and even donated! Whilst we will not be able to keep in touch with all 11,000 of our alumni post 25 May, successful alumni relations and development is not just about how big your database is! Moving forward we will only be communicating with alumni on their terms. GDPR has offered us the opportunity to strengthen relationships with the alumni within our community: to identify which alumni want to engage with us and to focus our attention on the most engaged!