

## Who 'owns' your data?

### Oundle School shares how they are working with their alumni association

Under the GDPR, you must inform your school community about who you will be sharing their personal data with and why. In some instances, as a data controller you will be sharing personal data with data processors such as printing or IT companies, and you will need to ensure data processing agreements are in place with any suppliers with whom you share personal data. However, what about your alumni association and the pta? Are they data processors? Or do they in fact have some 'control' over personal data?

Matthew Dear, Executive Director of Development at Oundle School shares with us how Oundle School approached data sharing with their alumni association, the Old Oundelian Club.

#### Who 'owns' your alumni data?

This proved surprisingly difficult to establish. Looking back, we found that both the school and the alumni association had added data to our current alumni database, and that both organisations had contributed financially to the infrastructure for processing this data.

#### So, how did you decide who was the data controller – the school, the alumni association or both?

We explored who actually 'controls' the alumni data; who was determining how alumni's personal information was being processed. In Oundle's circumstances, it became apparent that the school was in fact responsible. The secretary for the Old Oundelian Club is employed by the school. Whilst she effectively administers the database on behalf of the alumni association, the alumni association do not contribute to her salary, nor do they have access to the data except under her auspices and in accordance with our privacy policy, therefore Oundle School is the sole data controller.

#### How have your alumni association responded to GDPR?

Needless to say, they took a keen interest, but were pleased that the solution lay in the 'service level agreement' and structure we recently established to define the relationship between us, and were even more pleased that – unless they do anything daft – the liability for the activities we carry out on their behalf would seem to be all ours!

#### How are keeping your alumni informed?

We have been clear in our privacy policy that whilst the alumni association have contributed to developing our alumni database and that we will continue to work with the Old Oundelian Club, the school is the sole data controller.

**What advice would you give other schools working with alumni associations and potentially sharing data?**

Deciding who is the data controller is important not only to how you move forward with your alumni association, but also for how you move forward with your alumni themselves. Under the GDPR, being transparent and accountable are key principles – but how can you inform your alumni as to how you are processing their personal data if you don't know which organisation or organisations are ultimately responsible for this data? Firstly, you need to determine whether you are actually “sharing data” at all – depending on how you operate, you may not be. In our case, because of the way we share and provide services, it became clear that we are not actually sharing data beyond the school's apparatus, and it is on this basis that a shared privacy policy was drafted to cover all of our activities.