

## **IDPE's response on behalf of schools to the ICO's call for views on the code of direct marketing**

As a part of our commitment to members, we pledged to champion schools' development. The Information Commissioner's Office (ICO) recently sent out a call for views asking how it could develop its previously published direct marketing guidance to address aspects of the new data protection legislation. Following feedback from members, we have responded to the ICO's consultation on the code of direct marketing, requesting further clarity and guidance on specific areas, as summarised below.

### Definition of direct marketing

Further clarification is requested on the definition of direct marketing, and in particular the difference between direct marketing to a mass audience, and individual relationship-building.

### Charitable organisations

Further examples of direct marketing within charitable organisations, and specifically guidance on fundraising approaches, such as major gifts and regular giving, to support understanding of how the code can be applied in a fundraising context.

### Membership organisations

Schools have small databases of individuals who are connected to the school in some way and therefore are in effect membership organisations. IDPE members would welcome further guidance and examples of how direct marketing differs within the context of membership organisations, where instead of communicating with a mass audience with no existing relationship, schools are approaching individuals with existing and longstanding relationships with their institution.

### Privacy notices

Guidance is requested on how schools can ensure transparency around their direct marketing activity, whether through individual or multiple privacy notices, and how detailed such privacy notices should be.

### Telephone Preference Service (TPS)

Schools often hold numerous telephone numbers for one individual, yet it is likely only one of these numbers will be registered with the TPS. IDPE members have requested further guidance on how to manage direct marketing approaches in these circumstances.

### Prospect research

Whilst the current code of direct marketing includes guidance on lead generation and marketing lists, it does not include specific guidance on prospect research, which is used by fundraisers to tailor and personalise direct marketing approaches and/or fundraising asks.

### Repeat requests for consent/suppression lists

IDPE members would welcome examples as to when it may be appropriate to re-connect with an individual who has in the past 'opted out' of communications. For example, within a schools' context many alumni have little or no contact with their school when they initially leave, yet welcome the opportunity to reconnect with their school, later in life.