GDPR Standard Consent

The GDPR sets a high standard for consent – this IS possible!

CASE STUDY – The Manchester Grammar School





Who we are?

Chris Rainford Business Development Manager

BUFFALO

A DIVISION OF RUFFALO NOEL LEVITZ

Gary Shipsey Managing Director

protecture

Simon Jones Director of Development







Frequently Asked Questions

- Do we need to do anything before GDPR comes into effect in May 2018?
- If we need consent now, what is changing in May 2018?
- Can we rely on legitimate interest?
- Do I need to update the consent I currently hold?
- I've heard I need consent to seek updated consent...please explain!
- How long does consent last for?
- Can we rely on implied consent?
- Does consent need to be collected in a granular format (e.g. fundraising, events)?





Manchester Grammar School

Why did MGS choose to go for opt-in consent as a basis for its alumni relations and fundraising programme?

Why did MGS use Buffalo?

What has Simon learnt from the process?







Product Development - Using Experts



Key Documentation

Direct Marketing Code of Practice v29

Code of Fundraising Practice v1.3	Fundraising Regulator
Fundraising Preference Service: Board decision on proposal for development v1.0	Fundraising Regulator
Personal Information and Fundraising: Consent, Purpose and Transparency v1.0	Fundraising Regulator
Fundraising and regulatory compliance, Conference Paper, 21 Feb 17	ICO
Guide to the Privacy and Electronic Communications Regulations v2.3.19	ICO
Privacy and Electronic Communications Regulations: Direct Marketing v2.2	ICO
Privacy notices, transparency and control v1.0.33	ICO
Preparing for the General Data Protection Regulation (GDPR) v1.0	ICO
Overview of the General Data Protection Regulation (GDPR) v1.1.2	ICO
The Guide to Data Protection v2.6.0	ICO
Consultation: GDPR Consent Guidance	ICO



The DMA



Consent Questionnaire

Consent Capture

Consent Storage





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Consent Questionnaire

- Determined the risk of affecting MGS's alumni privacy rights and expectations.
- Determined which email addresses we could use.
- After completing the questionnaire, we assigned a score to MGS's database, which determined the level of risk.

No	Consent Type	When you originally collected email addresses	Everyone	Some People	No One
1	Freely given	was everyone provided with an option to opt out of receiving future DM (Direct Marketing) emails?			
2	Freely given	was anyone coerced or offered undue incentives to ensure they consented to receiving DM emails from you?			
3	Freely given	was consent to receiving DM emails from you made a condition of subscribing to a service for everyone?			
4	Specific	did you clearly state for what purposes you would use their email e.g. fundraising, events, etc for everyone?			
5	Specific	did you record how and when everyone's email address was obtained?			
6	Informed	do you know which Privacy Notice was used when you collected everyone's email address?			





Consent Questionnaire Consent Capture Consent Storage





Phase 1 - Email

Email Type	Number Sent	Successful Deliveries	Click Rate	Response Rate	Phone Consent	Email Consent	Post Consent	SMS Consent	DC Consent
Formal Email (under 40)	400	356	37%	25%	90%	92%	80%	52%	87%
Informal Email (under 40)	397	369	31%	26%	81%	90%	80%	50%	88%
TOTAL	7,201	6,676	-	46%	72%	88%	75%	36%	87%





Phase 1 – Data Analysis

Table 1: Desktop vs Mobiles

Device	Response Rate
Desktop	40%
Mobile	60%

Table 2: Non Donor vs Donor

	Response Rate	Phone Consent	Email Consent	Post Consent	SMS Consent	DC Consent
Non-Donor	39%	70%	88%	75%	37%	86%
Donor	59%	75%	87%	76%	36%	87%

Table 3: UK vs Overseas

	Response Rate	Phone Consent	Email Consent	Letter Consent	SMS Consent
UK	46%	72%	37%	76%	37%
Overseas	54%	77%	34%	72%	34%





Phase 1 – Email: Time Comparison

Time	Action	Total Responses
4pm	Email sent	682
5pm		276
6pm	Social media post	143
7pm		96





Phase 2 - Phone

Completed Calls	Phone	Email	Post	SMS	DC
	Consent	Consent	Consent	Consent	Consent
137	74%	77%	91%	35%	90%

Phone results

Туре	Phone Consent	Email Consent	Post Consent	SMS Consent	DC Consent
Non-Donor	68%	69%	89%	33%	89%
Donor	84%	87%	93%	38%	92%

Email results

Type	Phone Consent	Email Consent	Post Consent	SMS Consent	DC Consent
Non-Donor	70%	88%	75%	37%	86%
Donor	75%	87%	76%	36%	87%





Phase 3 - Letter

Cold segment selected for test letter.

Number Returned	Phone Consent
36	69%





Consent Questionnaire Consent Capture Consent Storage





Consent Storage

On completion, MGS will have relevant data for all those individuals who have provided consent via email, phone or letter.

Phase 1 (email) = CSV files

Phase 2 (phone) = Audio files

Phase 3 (letter) = PDFs of scanned forms





Questions?



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