

The art of privacy notices

Winchester College tells us how they developed their privacy notices

The GDPR places greater emphasis on transparency and accountability: you cannot just decide you want to process personal data without considering your reason for processing the personal data, communicating this with your school community, and demonstrating you have considered their privacy rights. Your school privacy notice (or notices) are a way of being upfront with your school community about how you will be processing their personal data and why.

We talk to Lorna Stoddart, Director of Development at Winchester College about developing their privacy notices, and why this 'once forgotten, hidden away somewhere on a website' policy now has such an integral role to play in complying with the GDPR.

So, how many privacy notices do you need as a school?

At Winchester College, we have developed several privacy notices. The reasons for storing personal data vary depending upon the individual's relationship with the school. For example, when parents first register an interest with the school, we store their data for this purpose alone. If their son then secures a place at Winchester, they then receive a 'New Parent's Pack', which includes the school's privacy notice, covering all the reasons for storing their data with regard to their son's education and pastoral care. Separately, they also receive a privacy notice which gives details about fundraising, research, marketing, events, and anything to do with Winchester College Society's (Win Coll Soc) contact with them. We are acutely aware that we must avoid 'bundling' information together, but equally the requirement for transparency and avoiding 'jargon' was also a guiding factor in developing multiple privacy notices. We also include a shortened privacy notice with all fundraising and event communications, for example on donation forms and online appeals, with a link to the full Win Coll Soc privacy notice.

How are you sharing your privacy notices with your school community?

We are planning a campaign to collect preferences from everyone on our database at the end of July. It will include sharing our updated privacy notices with our school community, but it won't ask individuals to 'opt-in' as they have already done this by giving us their contact details. The focus will instead be on asking them how they would like us to communicate with them and what they would like to hear about. We will continue to communicate with them as we (and they) consider our carefully segmented and tailored communications to be in both their and our legitimate interest.

How will you record these communication preferences?

We will collate all information already stored in the solicit codes on the database under new preferences codes, to ensure that everyone's wishes are adhered to and that all personal data is stored in one place, where it can be easily updated as relationships mature or change. We conducted an audit across all relationships and databases held by the school, and we segmented it

according to relationship. As Win Coll Soc holds data for all parents, all past parents, all OWs, Friends of Winchester College, and almost all event attendees, we are acutely aware of our responsibility in managing data in compliance with GDPR and PECR (which collates the all-important details on how people like to be communicated with).

Why are privacy notices so important now?

Who hasn't had their privacy invaded without consent through junk mail, telephone calls to both home and mobile numbers, receipts being sent by email and then data being retained for marketing purposes, etc? We aim to reassure our Wykehamical community that their data is safe with us: it will not be shared and we will not abuse their trust in us. We are transparent about the purposes for data capture and storage. We know that we have a few areas still to be addressed and are focusing our attention on these areas with urgency.

With GDPR coming into force on 25 May, what are your plans for the future?

GDPR has encouraged us to consider how we manage and protect the personal data held by Winchester College. It has been particularly helpful in guiding our data protection practices, but we don't consider the 25 May as being the end-date for this work. We will continue to review our privacy notices, data storage management and practices, and communication strategy going forward ... as 25 May really is just the beginning.