Bolton School
Development Office Privacy Statement

The aim of this Statement

The Development Office supports the advancement of the Bolton School Foundation through the creation of meaningful relationships with Alumni, supporters and other friends of the School.

The aim of this Development Office Privacy Statement is to explain how the Development Office collects, stores, manages and protects personal data in its completion of this work. It aims to clarify the types of data that the office holds, and how this data is used to provide the services detailed below, in order that the Office can maintain positive relationships with all those individuals with whom it is in touch, and in order to provide those individuals with the information they need to manage their relationship with the School.

As part of the Bolton School Foundation, the work of the Development Office is completed in adherence with the School's Privacy Notice at all times, and this Statement should be read in conjunction with that notice. For more detailed information about the School's Privacy Notice, please contact the Clerk & Treasurer at CLFox@boltonschool.org or c/o Bolton School, Chorley New Road, Bolton BL1 4PA or by telephoning 01204 434715.

The work of the Development Office

Maintaining positive relationships with Alumni, supporters and other friends is hugely important to the School, and is the purpose of the Development Office's work within the Bolton School Foundation. This work includes the provision of a range of academic, social and networking events and publications, the facilitation of careers and skills advice for current pupils and for recent leavers, and fundraising on behalf of both Bolton School (for hardship grants, scholarships and capital projects) and the Bolton School Bursary Foundation (for the provision of bursaries at Bolton School), the Charitable Incorporated Organisation (CIO) established in 2022 to raise, hold and grant the School's bursary funds.

The School is very proud of the positive relationships it has with its Alumni and supporters, and is committed to ensuring these relationships are maintained sustainably. To that end, the Development Office will endeavour to use the information it holds about individuals to contact them appropriately and in line with their expressed preferences, to ensure that its work is carried out efficiently and effectively, and to continue to improve and enhance the services that it provides.

How the Development Office obtains the data it holds

In order to carry out its work, the Development Office holds a database of personal data for all those individuals with whom it is in contact, collated during the course of its relationship with these individuals, which is separate to that held by other departments within the School.

Initially, information about pupils, and their parents, is transferred into the Development Office's database from the School's pupil management system. During the pupil's time at the School, this information is maintained for accuracy, and augmented periodically by liaison with other departments of the School, where this is relevant to the work of the Office. Immediately prior to their departure from the School, consent is sought from all Year 13 pupils for the Development Office to sustain contact with them once they become Alumni, with their preferences then actioned accordingly.

The vast majority of the information the Development Office holds has been gathered from the individual concerned, through their engagement directly with the Office, and through their participation in events and other activities as a member of the School community. Data about Alumni has also been collated from historic pupil records kept by the School, from records previously held by the Old Boltonians' and Old Girls' Associations, and from information held in the School's Archive. The Development Office works consistently to ensure that the data it holds, particularly contact information, is accurate and up-to-date. As a result, it may also obtain information about individuals from publicly available sources such as the BT telephone directory, the Royal Mail's National Change of Address database (NCOA),

the Bolton Alumni Network, LinkedIn and other social media channels, and other public sources, and will use the information obtained, to update its records as appropriate.

On occasion, the Development Office may obtain information about individuals from other members of the School community. Should this be the case, the Development Office will always endeavour to verify this information with the individual concerned directly prior to the amendment of its records. The Development Office may also seek to obtain contact details for Alumni with whom it has not previously been in contact, in order that it can engage with as many of the School's Alumni as possible.

Data held by the Development Office

Examples of the types of personal data the Development Office stores and processes include:

- An individual's name, title, maiden name (where applicable), gender and date of birth;
- An individual's contact details including postal address, email address, phone number and links to social media accounts;
- Information about an individual's connections to the School;
- Information about an individual's time and experience at the School and at other academic institutions;
- Information about an individual's occupation and professional activities;
- Information about an individual's recreations and interests during their time at School, and since leaving;
- Information about an individual's family and spouse/partner, and about their relationships to other Alumni, supporters and friends;
- Records of an individual's donations and Gift Aid status, where applicable (as required by HMRC);
- Records of an individual's consent to be included in the School's Roll of Honour, published on the School's website, and in the Office's annual Giving Report.
- Records of communications sent to an individual by the School or received from them;
- Information about an individual's communications preferences (which can be changed at any time);
- Information about volunteering activities an individual has undertaken on behalf of the School;
- Information about an individual's wealth;
- Media articles about an individual;
- Information about an individual's membership of the Bolton Alumni Network;
- Information about an individual's participation in meetings, events, groups or networks related to the School and to the Alumni community.

How the Development Office uses this data

Unless an individual has indicated otherwise, their personal information is used by the Development Office for communications, Alumni relations and fundraising purposes, including (but not limited to) the following activities:

- The dispatch of School and Alumni publications;
- Notification of events for Alumni, supporters, and friends of the School;
- Fundraising appeals on behalf of both Bolton School and the Bolton School Bursary Foundation, the Charitable Incorporated Organisation (CIO) established in 2022 to raise, hold and grant the School's bursary funds;
- Requests for assistance with the School's careers programme;
- The promotion of the achievements and experiences of Alumni whilst they were pupils at the School;
- The promotion of discounts and services available to Alumni, supporters and friends of the School;
- Requests for feedback in order to improve the work of the Development Office, and the educational experience at the School.

All of the above may be sent using mail, telephone, email and social media, in line with the communications preferences an individual has expressed. Where the Development Office has been unable to obtain these preferences,

communications will not be sent using email or telephone, and will not include information relating to fundraising appeals.

The Development Office may use analytics tools to help improve the effectiveness of its communications, for example by tracking email open and click-through rates. The Development Office also monitors usage of the Bolton Alumni Network, including user numbers, and analysis of those users who have offered their professional assistance to pupils and fellow Alumni.

The Bolton School Foundation was established in 1915 by the extraordinary generosity of Lord Leverhulme. Since then, the School's continued success has been made possible in large part thanks to the culture of philanthropy which has developed within the School community. The Bolton School Foundation is committed to maintaining this culture of philanthropy, in order that it may continue to widen access to the outstanding educational opportunities it offers to the brightest and most talented children in the North West.

In its pursuit of this aim, the Development Office may therefore gather information about individuals from publicly available sources, including Companies House, the Electoral Register, Zoopla and reputable media outlets, in order to assess their inclination and capacity to support the School financially, and to enable the Development Office to focus its conversations with individuals about fundraising in an effective and appropriate manner. This process, which is often called 'wealth screening', is carried out internally by members of the Development Office or by trusted third party research providers. Such processing is always undertaken by an individual and never automated.

The Development Office is committed to working in a transparent, ethical and responsible way. Both Bolton School and the Bolton School Bursary Foundation are registered with the Fundraising Regulator and are committed to the Regulator's Code of Practice. In order to comply with its legal obligations, the Development Office may use information from publicly available sources to carry out due diligence on donations made by individuals to the School.

Protecting Individuals' Data

The data held by the Development Office is stored securely, in compliance with the legal and regulatory framework outlined in the School's Privacy Notice. Access to the Development Office's database is restricted to those individuals who require it in order to discharge their duties at the School, namely the members of staff who work in the Development Office, IT support staff and colleagues within the School who collaborate with the Development Office on Alumni relations and fundraising activities. A tiered access system is in place within the database to ensure that individual users have access only to the data that is relevant to their role.

The Development Office may sometimes use third-party partners to deliver activities and services. If an individual interacts with the School through a third party (for example, by making a donation to the School via the CAF website) then it may obtain information about that individual from that third party, but only if they have given their consent to that third party for that information to be shared.

The Development Office will not disclose personal data to individuals, organisations or other entities outside the School, other than those who are acting as its agents (including, but not limited to, the company used to design and dispatch its printed publications (currently BHW Print Group), its database supplier (currently Blackbaud), the software supplier used to provide the Bolton Alumni Network (Gravyty), the fundraising consultants used to collate Alumni communications preferences (Buffalo Fundraising) and members of the Old Boltonians' and Old Girls' Associations committees). All external organisations with whom data is being shared are required to sign a contract, and/or a confidentiality and data protection agreement, before any data transfer takes places.

As part of its activities, the Development Office does facilitate communication between individual members of the Alumni community, but personal contact details are never disclosed without the prior permission of the individual concerned.

The Development Office will never sell or trade personal data with a third party.

Individual Rights

Bolton School considers its relationship with its Alumni to be life-long, and the Development Office will use the information it holds to stay in touch with individuals until they indicate that they no longer wish to hear from the School. The Development Office will endeavour to ensure that the data it holds about an individual is up-to-date, reasonable and not excessive, and individuals can update or amend the information that is held about them, and change their communications preferences here.

Individuals can opt out of some or all communication from the School, and/or exercise their right to be removed from the Development Office's database at any time, using the contact details below. Should an individual choose either of these two options, the Development Office will record a core set of personal information (Name, Date of Birth and Years at School), in order to ensure that it does not contact that individual inadvertently in the future. Records relating to an individual's donations to the School may also need to be retained for statutory purposes.

Individuals can request a copy of the records the Development Office holds about them at any time, using the contact details below. Any concerns regarding the Development Office's management of personal data should be referred to the Clerk and Treasurer, Mrs C L Fox, who is the Foundation's nominated officer for data protection matters. Mrs Fox can be contacted at CLFox@boltonschool.org, or by telephoning 01204 434715.

If an individual considers that the Development Office has not acted properly when using its personal information, they should contact the Information Commissioner's Office.

Further Information

For further questions about this Development Office Privacy Statement, please contact:

The Development Office
Bolton School
Chorley New Road
Bolton
BL1 4PA

E: development@boltonschool.org

T: 01204 434718

Updates to this Statement

This Statement will be reviewed annually and, if required, updated to reflect the Development Office's information practices, should they differ substantially from those described in this Statement.

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