



P90.2 – PRIVACY NOTICE FOR SUPPORTERS

Written By :	Alison Packman – Compliance Officer & DPO	12 th June 2018
Reviewed By :	Alice Benzing – Menuhin Hall Manager	14 th June 2018
	Simon Browning – Bursar	13 th June 2018
	Sarah McDonald – Marketing & Communications Manager	18 th June 2018
	Amy Mitchell – Development Assistant	19 th June 2018
Approved By :	Kate Clanchy – Head	2 nd July 2018
Governor Review By :	Geoffrey Richards – Vice Chairman	2 nd July 2018

Contents

Revision History.....	3
Abbreviations, Acronyms and Definitions.....	3
Aim / Objective / Statement of Intent	5
Introduction.....	5
Responsibility for Data Protection	6
Types of Personal Data processed by the School	6
Donors	6
Friends of YMS.....	7
Customers	8
Alumni	8
Volunteers	9
Why the School and/or Menuhin Hall needs to process personal data	9
How the School collects data	10
Who has access to personal data and with whom it is shared	11
How long we keep personal data.....	12
Keeping in touch and supporting The Yehudi Menuhin School & Menuhin Hall	12
Your rights	13
Rights of access	13
Requests that cannot be fulfilled	13
Consent.....	14
Whose rights?.....	14
Data Accuracy and Security.....	14
This Policy.....	15

Revision History

Revision	Paragraph Number	Revision
June 2018		New Document

Abbreviations, Acronyms and Definitions

Abbreviation / Acronym	Definition
Alumni	Former staff or pupils of The Yehudi Menuhin School
CCTV	Closed Circuit Television
Data Controller	Organisations, including independent schools, that determine how people's personal data is processed and for what purpose.
Data Protection	The relevant English Law relating to Data Protection, including the GDPR and The Data Protection Act 2018.
Data Subjects	Any living individual whose data the Data Controller processes.
DPO	Data Protection Officer
DSAR	Data Subject Access Request
GDPR	General Data Protection Regulation
HMRC	Her Majesty's Revenue & Customs
PCIDSS	Payment Card Industry Data Security Standard
Personal Data	Everything from which a Data Subject can be identified. It ranges from simple contact details in order to book tickets to one of our concerts, to dates of birth for alumni.
Process/ Processing	Any handling of personal data such as collection, storage, alteration, use, transfer, restriction or destruction, whether or not by automated means.
Special Category Data	Some categories of Personal Data are special category data under GDPR. These comprise data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership; data concerning health or data concerning a natural person's sexual orientation.

Supporters	Includes Donors, Members of the Friends of The Yehudi Menuhin School, Customers of The Menuhin Hall, Alumni and Volunteers.
------------	---

Aim / Objective / Statement of Intent

This Privacy Notice applies to Donors, Members of the Friends of The Yehudi Menuhin School (referred to as “Friends of YMS”), Customers of The Menuhin Hall, (referred to as “Customers”) Alumni and Volunteers. These groups may also be collectively referred to as our “Supporters” throughout this document. This Privacy Notice relates to activities undertaken by The Yehudi Menuhin School (referred to as the “School”) and The Menuhin Hall, (referred to as the “Menuhin Hall”).

Please ensure you have read the table above for the meanings of specific terms shown in this document in italics.

1. This policy is intended to provide information about how the School and/or Menuhin Hall will use or *process personal data* about its Supporters.
2. This information is provided because Data Protection Law gives individuals rights to understand how their data is used. Supporters are all encouraged to read this Privacy Notice and understand the obligations of the School and Menuhin Hall.
3. This Privacy Notice applies alongside any other information the School or Menuhin Hall may provide about a particular use of personal data, including :
 - Any contract between the School and its Supporters;
 - The School’s Digital Media Policies;
 - The School’s Use of CCTV Policy;
 - The School’s Data Retention Policy;
 - The School’s Data Protection Policy;
 - The School’s various safeguarding, pastoral, and health and safety policies, including as to how concerns or incidents are recorded; and
 - The School’s E-Safety Policy.
4. Anyone who works for, or acts on behalf of, the School or Menuhin Hall (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice for Supporters.

Introduction

5. The Yehudi Menuhin School nurtures exceptional musical talent through a world class education – realising students’ potential and shaping UK and international music culture. Supporters who believe in our mission and share our vision for the future play a critical role in its fulfilment. Their involvement supports our pursuit of excellence and ensures the School's continued impact in the world through music education.

6. Developing a better understanding of our supporters through their personal data allows us to make better decisions, fundraise more efficiently and, ultimately, helps us to reach our goal of nurturing life-long mutually beneficial relationships between the School and its Supporters.
7. The Yehudi Menuhin School and Menuhin Hall promises to respect any **personal data** including **special category data** you share with us or that we get from other organisations, and keep it safe. We aim to be clear when we collect your data and not do anything you would not reasonably expect. We never sell or exchange information with other organisations.

Responsibility for Data Protection

8. The School has appointed **Kate Clanchy, Head, and Alison Packman, Compliance Officer and DPO, as responsible for data protection.**
9. They will deal with any requests or enquiries concerning the School or Menuhin Hall's use of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law.
10. They can be contacted as follows via email at head@menuhinschool.co.uk or alison.packman@menuhinschool.co.uk via telephone on +44(0) 1932 864739. You may also write to either Kate Clanchy and/or Alison Packman at The Yehudi Menuhin School, Cobham, Surrey KT11 3QQ.
11. The School has notified the Information Commissioner's Office of its processing activities. The School's ICO registration number is Z8192950 and its registered address is The Yehudi Menuhin School, Stoke d'Abernon, Cobham, Surrey KT11 3QQ.

Types of Personal Data processed by the School

Donors

12. This may include, by way of example:
 - Names, addresses, telephone numbers, e-mail addresses etc.
 - Date of birth and tax status (for example in relation to Gift Aid contributions)
 - Gender and preferred salutation
 - Education history (usually only if you are also a member of our Alumni)
 - Your professional activities
 - Current interests and activities, which may include extracts from related media stories
 - Family and spouse/partner details

- Relationships to other alumni, donors and Friends of YMS
- Donor status (i.e. current, lapsed, new), record of donations made, research and fundraising reports/briefings and wealth assessment information (where provided by Supporter to the School), indicators of your interest in giving, ethical and reputational risk analysis (commonly known as due diligence)
- Records of communications, meetings and marketing activities by the School
- Contact preferences
- Registration and attendance at events
- Seating preferences at events
- **Special category data** such as dietary requirements, access/mobility/hearing needs (where these have been provided by the Supporter)
- Donation details and preferences for whether your name can be used on donor lists or other stewardship materials.
- Images of donors (and other individuals) attending events such as concerts, and images captured by the School's CCTV system and/or The Menuhin Hall CCTV system

Friends of YMS

13. This may include, by way of example:

- Names, addresses, telephone numbers, e-mail addresses etc.
- Date of birth and tax status (for example in relation to Gift Aid contributions)
- Gender and preferred salutation
- Education history (usually only if you are also a member of our Alumni)
- Current interests and activities, which may include extracts from related media stories
- Family and spouse/partner details
- Relationships to other alumni, donors and Friends of YMS
- Membership Level (i.e. UK Friend, International Friend, Best Friend, Joint), renewal dates, research and fundraising reports/briefings and wealth assessment information (where provided by Supporter to the School), indicators of your interest in giving, ethical and reputational risk analysis (commonly known as due diligence)
- Records of communications, meetings and marketing activities by the School
- Contact preferences
- Registration and attendance at events
- Seating preferences at events
- **Special category data** such as dietary requirements, access/mobility/hearing needs (where these have been provided by the Supporter)
- Images of Friends (and other individuals) attending events such as concerts, and images captured by the School's CCTV system and/or The Menuhin Hall's CCTV system
- Bank details to facilitate membership payments by Direct Debit

Customers

14. This may include by way of example:

- Names, addresses, telephone numbers, e-mail addresses etc.
- Date of birth and tax status (for example in relation to Gift Aid contributions)
- Whether you are also a Donor, Friend of YMS or alumni
- Records of communications, meetings and marketing activities by the School
- Contact preferences
- Registration and attendance at events
- Seating preferences at events
- **Special category data** such as dietary requirements, access/mobility/hearing needs (where these have been provided by the Supporter)
- Images of Friends (and other individuals) attending events such as concerts, and images captured by the School's CCTV system and/or The Menuhin Hall's CCTV system
- Payment details (please refer to paragraph 21 for further details)

Alumni

15. When you leave the School you will be automatically gifted one year's membership of the Friends of YMS. In order to do this, some of your information may be transferred from the School's Management Information System to the Friends of YMS database. From time to time you may provide us with additional information about your ongoing career and this may be processed by us.

16. This may include, by way of example:

- Names, addresses, telephone numbers, e-mail addresses etc.
- Date of birth and tax status (for example in relation to Gift Aid contributions)
- Gender and preferred salutation
- Education history (such as period of attendance at YMS and conservatoires, teachers etc)
- Your professional activities
- Current interests and activities, which may include extracts from related media stories
- Family and spouse/partner details
- Relationships to other alumni, donors and Friends of YMS
- Membership Level of Friends of YMS (i.e. UK Friend, International Friend, Best Friend, Joint), renewal dates etc.
- Records of communications, meetings and marketing activities by the School
- Contact preferences
- Registration and attendance at events
- Seating preferences at events

- **Special category data** such as dietary requirements, access/mobility/hearing needs (where these have been provided by the Supporter or transferred from the School MIS)
- Images of alumni (and other individuals) attending events such as concerts, and images captured by the School's CCTV system and/or The Menuhin Hall's CCTV system

Volunteers

17. When an individual volunteers to support the Menuhin Hall as a Steward, or to support the School in some other way, it may be necessary for us to carry out various checks in order to comply with Safeguarding and/or Health and Safety legislation or recommended practice depending on the role taken. In order to do this we may need to collect, process and retain some personal data, including some sensitive personal data, about our volunteers in order to comply with regulations, legislations or recommended practice.

18. This data may include, by way of example:

- Names, addresses, telephone numbers, e-mail addresses etc.
- Date of birth
- Gender and preferred salutation
- Copies of identity documents used to complete Disclosure and Barring Service (DBS) checks where necessary
- Family and spouse/partner details (if you wish to volunteer with them)
- Relationships to other alumni, donors and Friends of YMS
- **Special category data** including medical information (to ensure that volunteers are able to safely provide services as a Steward in the Menuhin Hall) where these have been provided by the volunteer
- Records of communications, meetings and marketing activities by the School
- Details of volunteer duties undertaken including dates
- Records of any involvement in safeguarding issues

Why the School and/or Menuhin Hall needs to process personal data

19. In order to carry out its activities, the School and/or Menuhin Hall needs to process a wide range of personal data about individuals who are Supporters of the School. Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations.

20. Other uses of personal data will be made in accordance with the School or Menuhin Hall's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and subject to other relevant rules where special or sensitive types of data are involved.

21. The School and/or Menuhin Hall expects that the following uses will fall within that category or its “legitimate interests” :

- For the purposes of maintaining relationships with Donors, Friends of YMS, Customers, Alumni and Volunteers including direct marketing or fundraising activity;
- To target our resources effectively such as using education history to invite alumni to events for certain year groups;
- For the purposes of Donor due diligence, and to confirm the identity of prospective Donors, and their background and relevant interests;
- To provide information on relevant School and/or Menuhin Hall events based on previous interest in similar events;
- To provide refunds in the event of cancelled events at The Menuhin Hall;
- To reclaim monies in accordance with Gift Aid declarations;
- To record preferences for receiving information such as whether email, post or telephone communication is preferred;
- To carry out or cooperate with any complaints or investigation process;
- Where otherwise reasonably necessary for the School’s purposes, including to obtain appropriate professional advice and insurance for the School.

22. In addition, the School will on occasion need to ***process special category personal data*** concerning health or allergies in order to provide suitable access or appropriate catering at Donor events, or ensure that Volunteer stewards in the Menuhin Hall are able to fulfil their duties, or from time to time by explicit consent where required.

How the School collects data

23. Generally, the School receives personal data from the individual directly, including, in the case of alumni, from their parents as part of their admission to the School. This may be via a form, by booking tickets to an event, by making a donation, or simply in the ordinary course of interaction or communication (such as an email).

24. In some cases, personal data will be checked and/or collected from publicly available resources such as the Charity Commission, the Disclosure and Barring Service or Companies House. We may also collect information from other sources publicly available on the World Wide Web or published in articles/newspapers.

25. Depending on privacy settings and the privacy policies for social media and messaging services, you might give us permission to access information from those accounts or

services. For example you may post a review of a concert you attended at the school which we may share on our website or other social media channels.

Who has access to personal data and with whom it is shared

26. Occasionally, the School will need to share personal information relating to its community with third parties, such as:

- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants)
- Mailing Houses (to distribute brochures, newsletters etc – limited information such as name and address and mailing preferences)
- Government authorities (e.g. HMRC, DfE, UK Visas & Immigration, Police or the Local Authority); and
- Appropriate regulatory bodies. For example:
 - The Independent Schools Inspectorate (<https://www.isi.net/>)
 - The Charity Commission (<https://www.gov.uk/government/organisations/charity-commission>)
 - The Information Commissioner's Office (<https://ico.org.uk/>)

27. The School may also share images of supporters at events such as concerts and festivals. These may be made available to third parties. For example to the media (either printed or electronic) to promote an event or as part of post event publicity etc. Permission for the sharing of these images has been provided by attending these events.

28. For the most part, personal data collected by the School will remain within the School, and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a "need to know" basis). Particularly strict rules apply in the context of:

- Medical records and
- Pastoral or safeguarding records

29. Information relating to credit cards, debit cards or other methods of payment in relation to bookings made via The Menuhin Hall, are stored by a third party provider with whom the Menuhin Hall has a third party agreement. This information is not stored by the school but is partially accessible should it be necessary, for example, in the event of a concert being cancelled and the ticket holders being refunded.

30. Supporters are reminded that the School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are

proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on volunteers or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or the Police. For further information about this, please view the School's Safeguarding and Child Protection Policy.

31. In accordance with Data Protection Law, some of the School's processing activity is carried out on its behalf by third parties, such as IT systems, mailing houses, web developers, fundraising database providers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.

How long we keep personal data

32. The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. For further details please refer to the School's Data Retention Policy.
33. If you have any specific queries about how our retention policy is applied, or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact **Alison Packman, Compliance Officer and DPO**, via email at alison.packman@menuhinschool.co.uk. However, please bear in mind that the School and/or Menuhin Hall will often have a lawful and necessary reason to hold on to some personal data even following such a request.
34. A limited and reasonable amount of information will be kept for archiving purposes, for example; and even when you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a "suppression record").
35. The School may also retain copies of audio/video recordings of School activities such as concerts and recitals for archival purposes. Other related items such as concert programmes and press articles may also be added to the School archives.

Keeping in touch and supporting The Yehudi Menuhin School & Menuhin Hall

36. The School will use the contact details of Supporters of the School community to keep them updated about the activities of the School or relevant events of interest, including by sending updates and newsletters, by email and/or by post.
37. If you wish to limit or object to any such use or would like further information about them, please contact **Sarah McDonald, Marketing and Communications Manager**, via email at sarah.mcdonald@menuhinschool.co.uk or **Alice Benzing, Menuhin Hall Manager** via email at alice.benzing@menuhinschool.co.uk. You will always have the right to withdraw consent, where given, or otherwise object to direct marketing or

fundraising. However the School is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number). This is called a suppression record.

Your rights

Rights of access

38. Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School or The Menuhin Hall, and in some cases ask for it to be erased or amended or have it transferred to others, or for the School or The Menuhin Hall to stop processing it – but subject to certain exemptions and limitations.
39. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, or who has some other objection to how their personal data is used, should put their request in writing to **Kate Clanchy, Head** via email to head@menuhinschool.co.uk and also to **Alison Packman, Compliance Officer and DPO** via email to alison.packman@menuhinschool.co.uk . Where the request relates to data held by The Menuhin Hall, please direct your requests to **Alice Benzing, Menuhin Hall Manager**, via email at alice.benzing@menuhinschool.co.uk and also to **Alison Packman, Compliance Officer and DPO** via email to alison.packman@menuhinschool.co.uk
40. The School and/or The Menuhin Hall will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits (which is 30 calendar days in the case of requests for access to information (also known as DSAR or Data Subject Access Requests). Whilst the School and/or The Menuhin Hall will aim to respond to DSARs within the statutory time limits, more complex requests may take longer for us to respond, as will DSARs made just before, or during, School holiday closures. The School will advise the requestor of any anticipated delay along with reasons why we cannot respond within the 30 calendar day time limit should this be necessary. The School has a right to charge a reasonable fee for any unreasonable or excessive requests or for producing multiple copies of information.
41. The School and/or The Menuhin Hall will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the School and/or The Menuhin Hall may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

Requests that cannot be fulfilled

42. You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals or information which is subject to legal privilege (for example

legal advice given to or sought by the School, or documents prepared in connection with a legal action).

43. You may have heard of the “right to be forgotten”. However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice (See paragraphs 21 and 22). All such requests will be considered on their own merits.

Consent

44. Where the School or The Menuhin Hall is relying on consent as a means to process personal data, any person may withdraw this consent at any time. Please be aware however that the School and/or The Menuhin Hall may not be relying on consent but have another lawful reason to process the personal data in question even without your consent.
45. That reason will usually have been asserted under this Privacy Notice, or may otherwise exist under some form of contract or agreement with the individual (e.g. a parent contract, or because of a purchase of goods, services or membership of an organisation such as an alumni or Friends of YMS has been requested).

Whose rights?

46. The rights under Data Protection Law belong to the individual to whom the data relates. It may therefore be necessary to redact information relating to other third parties when providing information requested under a Data Subject Access Request.

Data Accuracy and Security

47. The School and/or The Menuhin Hall will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals are requested to provide notification of changes in contact details wherever possible.
48. An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law); please see above for details of why the School and/or The Menuhin Hall may need to process your data and who you may contact if you disagree.

49. The School and/or The Menuhin Hall will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to School and/or The Menuhin Hall systems. For example, The Menuhin Hall uses chip/PIN machines which are PCIDSS Compliant. All staff and governors will be made aware of this policy and their duties under Data Protection Law and receive relevant training.

This Policy

50. The School and/or The Menuhin Hall will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

51. Any comments or queries on this policy should be directed to **Alison Packman, Compliance Officer and DPO** via alison.packman@menuhinschool.co.uk.

52. If an individual believes that The Yehudi Menuhin School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School Complaints Procedure and should also notify **Alison Packman, Compliance Officer and DPO** via alison.packman@menuhinschool.co.uk.

53. If an individual believes that The Menuhin Hall has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should notify **Alice Benzing, Menuhin Hall Manager** via alice.benzing@menuhinschool.co.uk and should also notify **Alison Packman, Compliance Officer and DPO** via alison.packman@menuhinschool.co.uk.

54. You can also make a referral to, or lodge a complaint with, the Information Commissioner's Office (ICO), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

List of Appendices

There are no appendices to this Policy.