

DPIA: DDAR Privacy Notice Communication

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and you should read it alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

Step 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

In May 2018 in light of the implementation of the GDPR the University of Manchester's Division of Development and Alumni Relations (DDAR) published a revised Privacy Notice and Legal Bases Assessment for Processing Personal Information. These two documents set out the personal information processed by the DDAR, how it is done so, why, the legal bases for doing so, and the rights of the data subjects in respect of this processing. The two documents are publicly available here:

- Privacy Notice: <https://your.manchester.ac.uk/privacy/>
- Legal Bases Assessment: <https://your.manchester.ac.uk/privacy/legal-bases-assessment/>

This Data Protection Impact Assessment had been undertaken to record decisions around communicating the Privacy Notice to the DDAR's current stakeholders as well as the rationale behind how this work will be continued in the future. The aim of communicating the Privacy Notice is to ensure data subjects whose personal information is processed by the DDAR are informed about the processing and their rights in respect of this; and to ensure that the DDAR is conducting its processing in a fair, transparent manner in line with all relevant data protection regulation. This document is intended to record the discussions of Tom Jirat, Head of Operations, and Oliver Taylor, Development Research Manager, within the DDAR based on their professional expertise and understanding of the reasonable expectations of and what is most appropriate for DDAR stakeholders, alumni, supporters and potential supporters; their ongoing work with the University's DPO and Information Governance Office to ensure the DDAR and the University operates legally; and their understanding of the law, available case law, and the University of Manchester's institutional stance on data protection.

Step 2: Describe the processing

Describe the nature of the processing: *how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved?*

The processing undertaken by the DDAR is contained in the DDAR Privacy Notice. This is regularly reviewed and updated to ensure the accuracy of the information it provides reflects the activity of the Division. The purpose of this DPIA is to illustrate the considerations of the DDAR when determining how to communicate this information to stakeholders whose personal information is being processed.

Describe the scope of the processing: *what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?*

The table below records the stakeholder groups the Privacy Notice may need to be communicated to; the suggested method of communication and regularity of this communication; and the rationale behind these plans.

Stakeholder Group	Method of Communication and Regularity	Rationale
Current students	<p>The Student Data Collection notice (http://www.regulations.manchester.ac.uk/data-collection-notice/) contains a section on how details are used after an individual graduates, which makes reference to the DDAR and signposts the DDAR Privacy Notice. As this is a layered approach to privacy the webpage this is accessed through contains a one line explicit reference in the summary to the use of data to keep in touch with individuals after they have graduated. Students are therefore made aware of the DDAR's privacy practices at each point they are pointed to the Student Privacy Notice.</p> <p>At the point they register to attend a graduation ceremony or register to decline their attendance and ask for their certificate to be posted to them individuals are presented with the details held on them in the student system and a short version of the DDAR Privacy Notice explicitly on the</p>	<p>The DDAR's relationship with students is 'light touch' and through established student communications channels, and also mentioned in the Student Privacy Notice (http://www.regulations.manchester.ac.uk/data-collection-notice/). It would not be appropriate to students to communicate the DDAR Notice explicitly prior to this contact increasing once students graduate. This is reflected in the explicit communication of the short Privacy Notice along with the details currently held at the last substantial point of contact with all students prior to graduation. This second, more explicit communication of the DDAR Privacy Notice is intended to make clear to graduating students the nature of the DDAR's processing and how and why this is important to them continuing their relationship with the University as alumni. We believe individuals expect a 'for life' relationship with their University and presenting their personal information to them in this way helps ensure the information is accurate as well as ensuring their rights in respect of future processing have been made clear.</p>

	same webpage as the registration (or not) for graduation), just prior to seeing the contact details held on them in the student system. This informs them of how the DDAR uses their personal information (including a link to the full Privacy Notice), asks them to update it and tells them clearly how they can opt out of contact from the DDAR.	
Alumni contactable by email	Each summer from 2018 onwards we have decided to communicate privacy information by email to all alumni who we can contact by this method of communication, subject to their preferences. This email will include a link to signpost the reader to the Privacy Notice as well as a call to action for alumni to check and where appropriate update their details. This activity will continue indefinitely subject to it being deemed appropriate for the University's alumni engagement strategy and individuals this work aims to be of benefit to. In addition, every email sent by the DDAR contains the short version of the DDAR Privacy Notice in its footer and a link to the full version of the Privacy Notice.	The DDAR wishes to ensure it is operating in a transparent and ethical way. Subject to an individual's personal preferences this is the most cost effective way of providing them with information. Based on the data we have on opt outs and click throughs individuals expect this kind of communication and do not find it intrusive nor inappropriate. At the time of writing we are planning to conduct this activity each year to ensure individuals are explicitly reminded of their rights and freedoms in relation to the DDAR's data processing, although this approach will be reviewed prior to each year's communication. In including the email footer in each email sent by the DDAR, we are ensuring individuals are always reminded of their rights and what they can expect from the Division with regards processing of personal information.
Alumni not contactable by email but contactable by post	Whilst we are able to contact the significant majority of our recent graduates and indeed many of those who graduated some time ago by email there are a number whom we can only contact by post (and potentially phone). These individuals will receive a full printed version of the DDAR Privacy Notice as an enclosure in their copy of the alumni magazine should they receive one, and if they have not yet seen the Notice. The alumni	The alumni magazine is our most powerful piece of alumni relations collateral and has been deemed an appropriate vehicle for communicating the DDAR Privacy Notice on the bases of: cost (in that it is cheaper to include as an insert than to send individually); target audiences (in that the magazine has historically tended to focus on individuals for whom post is a primary method of contact); and appropriateness (in that it is deemed in keeping with the concept to alumni engagement to use a warm piece of engagement material to communicate a

	magazine is currently sent annually.	<p>factual document like the Privacy Notice). All individuals who have not seen the Privacy Notice will receive it in this manner as long as they are due to receive a magazine, as we cannot afford to send it to everyone. The magazine segmentation is determined by DDAR strategy, so focus will be on appropriate alumni groupings. As the University of Manchester is a UK institution and the majority of our graduates are based in the UK, however, individuals based in the UK are deemed a priority for activity. We therefore have committed to a separate segment to include UK based individuals who haven't seen the Privacy Notice irrespective of whether or not they were due to receive a magazine in the first place. Other international target areas for activity are considered in the segmentation planning and included where possible, but it is not possible include every country due to costs.</p> <p>There will therefore be some individuals outside the UK who we can only contact by post (and potentially phone) who have not seen the GDPR version of the DDAR Privacy Notice but whose personal information we process. There are roughly 37,000 individuals who fit this criteria at the time of writing (5 August 2019). On balance, as these individuals will have minimal if any contact with the DDAR anyway (which would only ever really be a DM ask or event invite via post if it weren't an alumni magazine) we feel we are justified to keep the data we have on them as they can reasonably expect us, as their alma mater, to have this information. Should an individual update us with information which means they can become more involved (such as an email address) they will receive Privacy Notice communications as per the group they fall into.</p>
Alumni contactable by phone only	We are planning to include these individuals in a segment to be telephoned by our Student Calling Team. This	These individuals will have minimal if any contact with the DDAR so but we feel we are justified to keep the data we have on them as they can reasonably

Commented [TJ1]: LMK: I am having concerns with this sentence:

Contactable by phone:

These individuals will have minimal if any contact with the DDAR so we feel we are justified to keep the data we have on them

Commented [TJ2]: Wording changed 'so' to 'but' - error on our part first time.

	hasn't been done yet but there are circa 13,000 individuals who fit this criteria at the time of writing (5 August 2019). We have no way of communicating the Privacy Notice in writing to them so need to try and update their details using the telephone first, before we can follow up with a communication of the Notice in an appropriate way (as per the above).	expect us, as their alma mater, to have this information. This said, as we do have a way of contacting them – albeit one not appropriate to communicate a full Privacy Notice - we are committed to trying to gain further details to ensure the Privacy Notice can be communicated appropriately. Should an individual from this group update us with an email or postal address they will receive Privacy Notice communications as per the group they fall into. The UK TPS register is checked weekly for UK numbers and international regulations will be consulted prior to any calling activity.
Lost alumni	We have no way of communicating with these individuals.	These individuals have no contact at all at present with the DDAR but we feel we are justified to keep the personal information we have on them as they can reasonably expect us, as their alma mater, to have this information and we would warmly welcome them updating us with new details and re-engaging with their University. Should an individual update us with information which means they can become more involved they will receive Privacy Notice communications as per the group they fall into.
Future, would be alumni donors	At the point of making a donation online or via a physical donation form individuals are signposted to the DDAR Privacy Notice. This is also included on all physical donation forms. Donors who give over the telephone are predominantly alumni and so will see (or have seen) the Privacy Notice as per the above; we will use a script to inform them when they donate; and those who are they will also receive it not alumni will see it at the first point they get a stewardship email (if they can be contacted by this means).	Signposting donors to how we use their information at the point of donation wherever possible is deemed the most appropriate and fair way of providing a processing notice. In reality, the significant majority of donors will have seen the DDAR Privacy Notice before they donate as they are alumni, or high level individuals assigned to a relationship manager whose emails (along with all DDAR staff) have signposts to the Privacy Notice in their footers. Furthermore, donors should have an expectation of the DDAR's processing given they are undertaking a positive and unforced interaction with the Division in giving or pledging a gift, and indeed, one which the DDAR must then act upon in order to fulfil. The number of individuals alumni who give via the telephone and have not

Commented [AD3]: Will they be checked for TPS if UK? If located overseas there may be other restrictions on telephone marketing related calls depending on the territorial scope of those laws

Commented [TJ4]: Yes, are TPS checked if UK – we run this once a week. We do undertake some international calling but have never screened these numbers. I will pick this up with our Regular Giving team to understand their future plans and we can go from there.

Commented [TJ5]: LMK: With regards to the lost alumni, I have concerns that we are keeping their details. Have you got any evidence that lost alumni have been in contact in the past and you have been able to regroup them / resegment in a new group?

Commented [TJ6]: As hopefully clarified on Thursday as graduates of the institution, we keep details for the lifetime of the institution. Once they become 'found' they will fall into the appropriate group for communication of the Privacy Notice. This is reflected in the DDAR data retention schedule in the Privacy Notice.

Commented [AD7]: What details do we hold on these alumni? Are we holding contact details we know to be wrong?

Commented [TJ8]: We have a mix of people who would fall into this group – some we'll have no contact details at all for; and some we'll have former contact details which are no longer valid (but which are helpful when trying to trace the individuals).

Commented [TJ9]: Now split to alumni and non-alumni donors

		<p>seen the Privacy Notice by another means is proportionally very small indeed. Given the disproportionate effort required to separately communicate a Privacy Notice to these individuals and the fact that as part of making a donation they can be deemed to have a reasonable expectation the University will process their information to fulfil this action no regular process exists to communicate the Notice to them separately. We have a script to use to tell donors how their data will be used when they give over telephone (see below). They will also receive the Privacy Notice, however, as part of subsequent communications such as stewardship emails (if they are contactable by email) which as per all DDAR emails have the short DDAR Privacy Notice in the footer and a link to the full DDAR Privacy Notice. As part of future developments we will evaluate the merits of a script to be used when people call the office to donate, part of which informs them how their data will be used. Donor specific communications relate to their gift: for example they will receive e-newsletters, annual update publications, and potential invites to donor receptions.</p>
Future, would be non-alumni donors	<p>At the point of making a donation online or via a physical donation form individuals are signposted to the DDAR Privacy Notice. The likelihood of a non-alumnus with no prior relationship with or connection to the University donating via post or phone is very low indeed; these kind of donations are most likely to occur via Crowdfunding projects non-alumni donors have a connection to. If non-alumni donors give via the phone we will tell them how their data will be used via a script (see below). They will also see it the Privacy Notice the first point they get a stewardship email (if they can</p>	<p>Signposting donors to how we use their information at the point of donation wherever possible is deemed the most appropriate and fair way of providing a processing notice. In reality, the significant majority of donors will have seen the DDAR Privacy Notice before they donate as they are alumni, or high level individuals assigned to a relationship manager whose emails (along with all DDAR staff) have signposts to the Privacy Notice in their footers. Furthermore, donors should have an expectation of the DDAR's processing given they are undertaking a positive and unforced interaction with the Division in giving or pledging a gift, and indeed, one which the DDAR must then act upon in order to fulfil. Donor specific communications relate to their gift: for example they will receive e-</p>

Commented [TJ10]: We unfortunately can't get an exact figure for this but at present we do not actively solicit non-alumni donors by telephone as a matter of course. For a non-alumnus to given via phone they would have to seek out something they wanted to fund and then actively phone the office to do so (see section added below). This kind of unsolicited giving by non-donors is very unlikely, especially via phone – if it did happen we suspect it would more likely be online.

Commented [TJ11]: LMK: With regards to donors, I would suggest that whilst on the phone they can be directed to our website for details on our privacy notice. Same for Event Registrants, If you do decide to include scripts in the future I would suggest that you updated this DPIA.

Commented [TJ12]: Ok - would be covered by the 'script'. I think this should only be a couple of lines though. This is now included on page 10.

Commented [AD13]: This group, specifically donors that are not alumni poses a greater compliance risk in the sense that without consent there is little to justify further electronic marketing post donation. Sending a privacy notice which seeks to rely on legitimate interests for those not in the alumni group would be likely to be considered unfair processing by the ICO and incompatible with PECR.

Commented [TJ14]: We have sent an email of the Privacy Notice and a link to the giving blog recently and would hope we can cover this under an 'administration' communication. We shouldn't have to do this again now the Privacy Notice is provided at each point of donation.

	<u>be contacted by this means).</u>	<u>newsletters, annual update publications, and potential invites to donor receptions. We do not currently actively re-solicit non-alumni donors by telephone. They are occasionally included in direct mails shots (legitimate interest). We do have a handful of non-alumni individuals (27 in total) who actively indicated (proactive consent) that they were interested in making a regular donation to the University on the Hubbub crowdfunding platform when this was offered. This option is no longer present but we believe we have consent to contact these individuals for this purpose and need to follow this up.</u>
Non alumni past low level donors (given or pledged less than £10,000) contactable by email	This group consists of non-alumni who we have no concrete record of proactively communicating the GDPR DDAR Privacy Notice to but who have given non-major gift level donations to the University and we can contact by email. They will receive an email (subject to their preferences) which signposts them to the DDAR Privacy Notice and the DDAR Giving Blog. This will be undertaken once, in July 2019, and include circa 950 individuals.	These are individuals who we may resolicit for support in future so it is important they see the Privacy Notice. Communicating it by email is the most cost effective method. This activity is expected to need to be undertaken once to cover individuals who did not see the GDPR version of the DDAR Privacy Notice when they donated. There is an expectation that as donors to the University these individuals will have an expectation the institution will process their personal information, and (from 24 May 2018 onwards) donors will be signposted to the appropriate Privacy Notice when they give (for all methods except telephone donations – see above).
Non alumni past low level donors (given or pledged less than £10,000) not contactable by email but contactable by post	This group consists of non-alumni who we have no concrete record of proactively communicating the GDPR DDAR Privacy Notice to but who have given non-major gift level donations to the University and we cannot contact by email but can by post. They will receive a Privacy Notice insert in a copy of the 2019 supporter newsletter. Circa 650 individuals fall into this category at the time of writing (5 August 2019).	These are individuals who we may resolicit for support in future so it is important they see the Privacy Notice. Communicating it by post is the only option we have for this group. This activity is expected to need to be undertaken once, to cover individuals who did not see the GDPR version of the DDAR Privacy Notice when they donated. There is an expectation that as donors to the University these individuals will have an expectation the institution will process their personal information, and (from 24 May 2018 onwards) donors will be signposted to the appropriate Privacy Notice when they give (for all methods except telephone donations – see above).

Commented [TJ15]: We do need clarification on what 'stewardship' counts as: is it wrong to see it as administrative? This influences how we can market, and if we need consent.

Commented [AD16]: As above. It is unlikely from previous ICO decisions relating to charities and to the their PECR guidance that the ICO would view electronic marketing to donors as compatible with PECR without opt-in consent

Commented [TJ17]: As mentioned above: we have sent an email of the Privacy Notice and a link to the giving blog recently and would hope we can cover this under an 'administration' communication. We shouldn't have to do this again now based on the above.

Commented [AD18]: Legitimate interests is likely to be acceptable for this group but only for postal communications if they were to provide an email address or we obtained one it would be likely to require opt-in.

Commented [TJ19]: Should be ok – will contact these with the Privacy Notice via post, with an insert in the Your Impact publication.

Event registrants	At the point of registering for an event online, which is how the significant majority of registrations are taken, individuals are signposted to the DDAR Privacy Notice. <u>We have a script to read out to</u> individuals who register over the telephone will not receive direct communication of the to signpost them to the Privacy Notice but we are looking into the feasibility of a script to read out when they do which will and alert them to how their personal information will be used <u>(see below)</u> . We have a <u>web</u> script on DDAR website that looks for pages in the events area that have a form on, and if it finds them it displays the privacy notice. This script runs automatically.	Signposting event registrants to how we use their information at the point of their registration wherever possible is deemed the most appropriate and fair way of providing a processing notice. In reality, event registrants should have an expectation of the DDAR's processing given they are undertaking a positive and unforced interaction with the Division in registering for an event, and indeed, one which the DDAR must then act upon in order to fulfil. The number of individuals who register via the telephone and have not seen the Privacy Notice via another means is small. Given the disproportionate effort required to separately communicate a Privacy Notice to these individuals and the fact that a As part of registering to attend an event they can be deemed to have a reasonable expectation the University will process their information, no regular process exists to communicate the Notice to them separately but we will also use a script to signpost them to the Privacy Notice during the call. They will will also receive signposts to the Privacy Notice as part of emails they are sent from DDAR, which contain it in the footer. <u>We do not currently market to people based on them solely being an 'event registrant' and will review our practices should this approach ever be reviewed.</u>
Staff and former staff	No bespoke communication.	The significant majority of staff whose information the DDAR process will fall into another group, e.g. alumni, donors, prospects, event registrants or volunteers and therefore receive the Privacy Notice owing to this via the appropriate method. Those who do not will be key stakeholders in the DDAR from an internal perspective Beyond this we have c. 1000 staff and c. 650 former staff who only fall into these <u>constituency groups – these records are due to be reviewed and deleted if it is no longer appropriate to hold them.</u> These Individuals will receive the Privacy Notice via the email footer of DDAR staff whenever they communicate

Commented [TJ20]: We don't really do follow up marketing other than 'how did you find the event' as a result of someone attending an event; and don't treat 'event registrants' as a group to be marketed to because of this (although some may be alumni, donors etc)

Commented [AD21]: True but possibly only as far as event administration goes not follow-up electronic marketing to non-alumni where the event does not involve payment i.e. the purchase of goods or services.

Commented [TJ22]: LMK: With regards to donors, I would suggest that whilst on the phone they can be directed to our website for details on our privacy notice. Same for Event Registrants, If you do decide to include scripts in the future I would suggest that you updated this DPIA.

Commented [TJ23]: As above – don't market to event registrants on this basis, only if they fall into an additional group such as alumni.

Commented [AD24]: As above, there is risk relying on legitimate interests for electronic marketing off the back of a free event.

		by email; there is also a reasonable expectation that as employees of the University they can expect a Division of the organisation such as the DDAR to process their information. <u>We do, however, need to explore if we can get the DDAR Privacy Notice signposted to in the Staff Privacy Notice, as Staff and Former staff are likely to be an increasingly important constituency group for engagement in future.</u>
Volunteers	No bespoke communication.	The significant majority of volunteers whose information the DDAR process will fall into another group, with the majority being alumni. They will therefore receive the Privacy Notice owing to this via the appropriate method. The DDAR's alumni and volunteering portal, the Manchester Network, also signposts users to the appropriate Privacy Notices when they sign up for the service. We only have circa 70 volunteers (ever) on record who are not alumni or donors.
Individuals with current or previous high level involvement	No <u>Bespoke communication when appropriate so as not to impede the relationship.</u>	These individuals have given significant financial support to the University (£10,000+) and/or been involved at a significant level as a supporter, friend or critical partner of the institution. Whilst some may no longer have a strong connection to the University the status of these individuals means that a direct communication of an updated Privacy Notice is inappropriate when balanced against the individuals' expectations that the University must process their data to have a record of their prior involvement. At the time of writing, we believe there only to be circa 200 individuals who fall into this category (on a database of 580,000+ constituents). <u>A Privacy Notice will be communicated in a bespoke manner if and when appropriate so as not to impede the relationship.</u>
Non alumni individuals with potential high level involvement	Individualised communication from relationship manager when assigned.	These individuals have the potential to offer significant financial support to the University and/or be involved at a significant level but who have no prior connection to the University. A specific, <u>explicit</u> Privacy Notice communication <u>sent at the point of data collection</u> is

Commented [TJ25]: Not sure on this one – can we rely on the staff privacy notice to cover it? Seems the most low risk too.

Commented [AD26]: This group is not necessarily one block, there may be differences between the groups.

Commented [TJ27]: Alex – can we do this if I draft something up? Our LBA will also need to be updated if we can.

Commented [AD28]: Again electronic marketing to volunteers who are not alumni relying on legitimate interests could be an issue

Commented [TJ29]: We don't market to these people at present in DDAR – we only communicate with them about volunteering.

Commented [AD32]: I think I would actually interpret these individuals as having received a form of bespoke information as I assume they receive personalised information

Commented [TJ30]: LMK With regards to Individuals with previous high level involvement, if we are not writing to them and following your rationale, I would not expect for us to have the data.

Commented [TJ31]: Balancing test - not appropriate to delete data as important to maintain a record of their involvement and limited impact on the data subjects.

Commented [AD33]: Agreed

Commented [TJ34]: LMK: With regards to Non alumni individuals with potential high level involvement, you will need to rewrite this section as it does not represent what you are doing. It seems to say that you do not give the Privacy statement to them when they actually get a more bespoke engagement by one to one attention, hence more opportunity to be exposed to the privacy notice.

Commented [TJ35]: Not sure about fully re-writing here, Laurence, as discussed today as it does reflect what we do, but I have added 'explicit' to clarify. This is in line with CASE guidance, agreed with the ICO – Ollie will forward on for reference!

		likely to be damaging to the building of the relationships and the business objectives of the DDAR. We understand that these individuals will have a reasonable expectation that their personal information (from the public domain) will be processed in this manner to allow appropriate approaches and conversations <u>in line with their interests</u> . Accordingly, we will ensure that the DDAR Privacy Notice is included as relationship managers build these relationships (usually in the form of an email footer from an individual relationship manager's email account) but, considering the legitimate business objectives and what these individuals would expect, will refrain from <u>sending</u> direct Privacy Notice communications before any contact is made.
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Commented [AD36]: Agreed

It is a Divisional requirement that all DDAR staff have the short version of the DDAR Privacy Notice in their email footers. This ensures that any individual in contact with a DDAR staff member directly, be they alumni, students, prospects, colleagues or supporters, also receive a signpost to the Privacy Notice as part of that conversation. The same statement is included on all bulk email communications sent by the DDAR. A 'micro' version of the Privacy Notice is included on all data capture forms, and integrated into all business areas the DDAR is responsible for and obtains information from.

When speaking to individuals on the telephone as a means of data collection (e.g. registration for an event or giving of a donation) we will use the following script:

Just to let you know, the Division of Development and Alumni Relations processes your personal information in accordance with all relevant data protection legislation. Our Privacy Notice is available at <https://your.manchester.ac.uk/privacy> and you can tell us how you want to hear from the DDAR at any time by contacting us on alumni@manchester.ac.uk or +44 (0)161 306 3066.

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Describe the context of the processing: *what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?*

All individuals whom we wish to see the DDAR Privacy Notice either have a pre-existing relationship with the University or the potential to have one in the future. As such, we believe there is an expectation from these individuals that their personal information may be used by the DDAR to fulfil its mandated functions in support of the University of Manchester's core goals of outstanding learning and student experience, world-class

research, and social responsibility. This said we are committed to ensuring we only process personal information in ways individuals would reasonably expect and always balance our approach against their rights and freedoms. Our Privacy Notice and Legal Bases Assessment are crucial to this, and we believe communicating them appropriately is (or should be) standard practice.

We are aware that the charitable sector has been subject to considerable media attention over the past few years which brought to light poor practice in a number of organisations of which the University was not one. Nonetheless, as a values driven organisation committed to transparency, ethical practice and doing the best for society as well as the individuals who trust us with their personal information we have used this climate and changes to the law as an opportunity to review and where appropriate improve our work. We are a member of the Fundraising Regulator, and actively keep abreast of policy and regulation developments from the ICO as well as established sectoral bodies such as the Council for the Advancement and Support of Education (CASE) and the Institute of Fundraising (IOF).

Describe the purposes of the processing: *what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?*

The purpose of this exercise is to ensure data subject stakeholders receive the appropriate information to ensure that they are aware of what, how and why the DDAR is processing their information, and what their rights are in respect of this. This is to be achieved via the communication of the DDAR Privacy Notice. The benefits to the DDAR are ensuring it is working in an ethical, transparent way that meets the expectations of its stakeholders whose rights and freedoms have been considered at every stage of the development of the Division's approach to legal compliance.

Step 3: Consultation process

Consider how to consult with relevant stakeholders: *describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?*

As part of its preparations for GDPR in January 2017 the DDAR established a Compliance Working Group which meets once a month and consists of the Deputy Director – Development Services, Head of Operations and Development Research Manager. This group is responsible for the Division's approach to data protection, working closely with the University's Information Governance Office. The University Data Protection Officer is invited to this meeting when appropriate and as required. The Director of the Division of Development and Alumni Relations and other senior University stakeholders are kept informed and asked for guidance, steer and input as appropriate.

Data on interactions and communications with and the behaviour of the University's 488,000+ alumni has underpinned the decisions taken throughout the GDPR preparation as it has been our best way of understanding the expectations of data subjects and as a result the actions we have needed to take. Given the number of

alumni the University has and the fact the DDAR’s activity has been established for circa thirty years it was not practicable to seek consultation with them, however feedback received is always duly considered and actioned as appropriate. We are keen members of professional networks and rely on the ICO’s guidance to underpin our approach.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: *what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?*

Our Legal Bases Assessment sets out our lawful bases for processing for all types of DDAR activity and for all stakeholder groups. This works alongside our Privacy Notice and both documents are publicly available to ensure transparency. We believe the decisions taken and documented in Step 2 with regards the communication of the Privacy Notice are appropriate relative to each stakeholder groups’ expectations.

Step 5: Identify and assess risks

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk

This DPIA covers individuals seeing the DDAR Privacy Notice at a time and in a way appropriate to them and their relationship with the DDAR, documents the DDAR's considerations in this respect, and rationalises the risks involved.			
The risks associated with the communication of the DDAR Privacy Notice to individuals are:			
1) An individual does not see the Privacy Notice and objects either immediately or at a later date to something contained in it.	RemotePossible	Remote	LowMedium
2) An individual sees the Privacy Notice and objects to something in it immediately or at a later date.	PossibleRemote	Remote	LowMedium
3) An individual never gets the chance to see the Privacy Notice so is unaware the DDAR is processing their information.		Remote	
3)4) We communicate to an individual we seek to rely on legitimate interest to carry out electronic marketing based on the fact they have purchased a service from us, and they object to this or disagree with our interpretation of the law. This is a compliance and corporate risk although the potential damage to individuals is low.	RemoteRemotePossible	Remote	LowMediumMedium

Commented [TJ37]: LMK

Overall, I agree with Alex's evaluation of the risk raised, which are too low. Additionally there are a couple of risks to consider, depending on your responses with regards to data being kept but not accurate potentially (Lost alumni for example) and there is still a question of retention of the said records if we don't communicate to them why have we got them?

Commented [TJ38]: Need to retain certain record for lifetime of the institution in line with the University's and DDAR objectives; these are people who have engaged with us.

Commented [AD39]: For 2 and 3 in particular I think given we are required to also consider the compliance and corporate risks the overall risk may be higher. We will be communicating to individuals the fact that we seek to rely in legitimate interests to carry our electronic marketing and for certain groups this is likely to be problematic.

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Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated, reduced or accepted	Low, medium or high	Yes/no
1) An individual does not see the Privacy Notice and objects either immediately or at a later date to something contained in it.	Based on the rationales above in Step 3, the risk here is negligible in the first instance as the significant majority of individuals the DDAR processes personal information on will have the opportunity see the DDAR Privacy Notice on regular basis. For those who do not, a decision has been taken which balances their reasonable expectations, rights and freedoms, and the objectives of the University. If a data subject raises any objections to processing the DDAR will do all it can to address these effectively and efficiently at the point they are raised.	Accepted	<u>Low</u> <u>Low</u>	N/A
2) An individual sees the Privacy Notice and objects to something in it immediately or at a later date.	This will always be a risk in communicating the Privacy Notice proactively. If a data subject raises any objections to processing the DDAR will do all it can to address these effectively and efficiently at the point they are raised.	Accepted	<u>Low</u> <u>Low</u>	N/A
3) An individual never gets the chance to see the	The DDAR could communicate the DDAR Privacy Notice to every single individual personally before any further contact is undertaken. This is, however, likely to impede	Accepted	<u>Low</u>	N/A

Commented [TJ40]: Alex, Laurence – please can you clarify what this means?

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Privacy Notice so is unaware the DDAR is processing their information.	the development of a relationship where are very small number of individuals with unique or bespoke connections to the Division are concerned and the initial connect is usually undertaken by email. There will be some individuals who the DDAR has historical information on but is now unable to contact, for example 'lost' alumni. For these individuals, there is a chance they may object to the DDAR processing their information but given they have an established relationship with the University it is assumed there is a reasonable expectation from them the University will process their data and on balance this processing does not impede them in any way, damage their rights and freedoms, nor cause them undue harm or distress. If a 'lost' individual updates their details in any way they should see the DDAR Privacy Notice and be given a chance to update their preferences accordingly.		Low	
4) We communicate to an individual we seek to rely on legitimate interest to carry out electronic marketing based on the fact they have purchased a service from us, and they object to this or disagree with our	<u>The data we have suggests that individuals with a prior connection to us expect us to communicate with them via email. Our publically available Legal Bases Assessment (https://your.manchester.ac.uk/privacy/legal-bases-assessment/) sets out our position. We have balanced the potential impact on individuals who may disagree with our understanding and interpretation of the law against the potential benefit this activity has on society to come to our conclusion.</u>	Accepted	Low	N/A

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interpretation of the law. This is a compliance and corporate risk although the potential damage to individuals is low.				
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Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	JUDE	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	N/A	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	ALEX	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:	KATE W	If overruled, you must explain your reasons
Comments:		

Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will be kept under review by:	Jude Alldred and Tom Jirat	The DPO should also review ongoing compliance with DPIA

LMK: Overall, I agree with Alex's evaluation of the risk raised, which are too low. Additionally there are a couple of risks to consider, depending on your responses with regards to data being kept but not accurate potentially (Lost alumni for example) and there is still a question of retention of the said records if we don't communicate to them why have we got them?