

The Use of Personal Data by the St Christopher Club.

“The processing of personal data should be designed to serve mankind. The right to the protection of personal data is not an absolute right; it must be considered in relation to its function in society and be balanced against other fundamental rights, in accordance with the principle of proportionality.” [Preamble to the General Data Protection Regulations, Paragraph 4]

Collection and Use of Data by the St Christopher Club

The General Data Protection Regulation (GDPR), which originated as an EU regulation, is expected to be incorporated in its entirety into UK legislation, and will thus remain in force after the UK leaves the EU. It contains many of the principles which were in the former UK law it replaces, and some are strengthened. It requires us to explain to our members what data we might hold on them, what we do with it, who they can contact if they wish to opt out, and so on. That is the function of this document.

Aims, Activities and Constitution of the St Christopher Club.

This document will first set out what the Club does, and how we aim to work within the data protection requirements, and will then give the various pieces of information which the General Data Protection Regulations specify should be made available to all Club members.

The St Christopher Club was set up in 1920 by a group of old scholars and staff. The Directors of the School at the time were consulted and declared they were delighted to be invited to social occasions, but that the Old Scholars were welcome to organise a club themselves; they did not desire to be consulted. Hence the St Christopher Club was set up as an independent organisation, and it has remained so. The Club’s name reflected the intention that it was to be as much for former staff as for former pupils. Although the Club is formally independent, we aim to work closely with the School, and we are of course entirely dependent on the goodwill of the School in order to hold reunions there, enrol new leavers, and so on. Records of old scholars have been kept for the joint use of the Club and the School. For many years the Club had no constitution as such, just “Reg Snell’s Rules” for electing its committee, but more recently a need was felt for a more formal constitution, which was ratified at the Annual General Meeting in July 2016. You can find a copy on the Club website.

Our purpose is to try to keep former pupils and members of staff of St Christopher School in contact with the school and each other, and to collect and disseminate news of old scholars and former staff, and matters of interest concerned with the history of the School, by means of reunions, newsletters, and correspondence. All former pupils and staff are deemed to be ‘members.’ Those who pay a small subscription to receive newsletter booklets will be referred to as the ‘subscribing members’. The Club runs on a shoestring and by means of the work of a committee of volunteers, which is elected by the A.G.M. in accordance with our constitution.

Those who volunteer to work on the Club's behalf do so because they believe old scholars and former staff appreciate what we are doing, and most of the feedback we get suggests they do. In addition to giving news of the School, our newsletters exist to record and celebrate the various achievements and doings of old scholars and former staff, to advertise services they may offer, or books, CDs and so on they may have produced, and to celebrate their lives when, sadly, we have to announce their decease. If anyone who has attended or worked at St Chris does not want to have anything further to do with it or us, and has no interest in engaging with the community of old Christophians, the last thing we want is to force our attentions upon them. We have no commercial interest in our members, and the Club is not profit making - no official can benefit in any way from the few assets the Club has. We keep the Club going only from a desire to be helpful to the majority of old scholars who wish to keep in touch with us. If you do not want to have anything to do with us, we in turn do not want to waste our time trying to track you down, or to add to the Club's postage costs by mailing anything to you.

It is possible that the School may occasionally use our mailing list to interest old scholars in an appeal for funds, although in practice the last time it did so was in 1998. However, you are of course free to ignore such communications, or to tell us you don't want them, and your request will be respected, like all other requests to be 'taken off the list.' The Club itself is entirely social in nature.

Our interests therefore coincide with your rights under the General Data Protection Regulations, and we are only too happy to work according to their provisions. We have always been very willing to cease communicating with you, or to take your details off our records and cease to collect any information about you; you have only had to tell us. Please just email or write to us to that effect.

We are not interested in anyone not connected with St Christopher School, Letchworth, nor has the Club ever collected or kept information on such people.

Now for the more formal notice of our procedures required by the Regulations.

Collection and recording of information.

The GDPR require personal data to be collected and processed lawfully and in a transparent manner. It is lawful for us to keep and process data where it is necessary for the purpose of our legitimate interests – those of an alumni club – except where such interests are overridden by the interests, rights or freedoms of the data subject. The phrase 'interests of an alumni club' is intended to include the collection of and dissemination of news to members of the Club by means of newsletters and otherwise, celebrating the lives and achievements of members in all their rich variety, including the writing of obituaries when we learn of their decease, and the collection and preservation of materials concerned with the history of the School, it being lawful to keep data for archival purposes, for historical or genealogical reasons.

For members who subscribe to our newsletters, order any material published by the Club from time to time, or who may book to attend reunions, we may keep additional financial records of sums paid, services given, and so on, it being necessary to keep such records in order to give the service paid for. Data of this kind is kept from what the Regulations refer to as 'contractual necessity' - that is to say, we could not provide the service if we did not have it.

Personal data we may hold on old scholars or former staff.

- Your name, gender and date of birth (where known).
- Your relationship(s) to other old scholars or staff (where known), in cases where other members of your family have also attended or taught at St Christopher School.
- Your contact details – postal address(es), telephone number(s) and email address(es) where known. (We may, for example, have a home and a work address or email address.)
- The dates when you were at St Christopher.
- In the case of former staff, the subject taught, any post of responsibility and/or other role in the school, such as head, matron, houseparent, etc.
- In the case of former pupils, schools, college or university courses attended after St Chris (where known).
- In the case of deceased persons, their date of decease (where known) and a brief statement of how we learnt that they were deceased.
- Records of communications and interactions we have had with you, including any requests that we do not contact you, or that you do not want to be contacted in particular ways.
- Records relating to subscriptions paid, newsletters sent, honorary or life membership, for those who choose to subscribe to our newsletters.
- Lists of who attended reunions.

We may also have biographical information which you or others have sent to us, or was in the public domain, in books, newspapers, magazines, the web, etc., such as

- Accounts of what you have been doing post St Christopher, which you sent us for publication in the Club newsletter.
- Accounts you may have given us of your time at St Christopher, which may have been published in the newsletter, and/or given to us to archive for historical purposes.
- Information on spouse, partner, children or other family which you have given to us.
- Information you have shared on social media, or elsewhere on the internet, on personal or business websites.
- Information on you which may have been published in the press, or otherwise put into the public domain.
- Information on any books you may have written, CDs produced, or other achievements, or information you may have given us to advertise a service you provide to others in our newsletters.
- The address of any website which contains information about you, or any enterprise you own or run.

Note:

We do not hold any financial details about you, such as credit card information or bank details. In the case of subscribing members we have only the reference which may appear on our bank statements - usually just your name - in the context of direct transfer or standing order payments. We keep no details of anything on cheques you may send us except name, date and amount; while in the case of PayPal payments we know only the information PayPal

sends us - your email address, the postal address declared to PayPal, the date and the amount paid.

We do not aim to collect any information which the General Data Protection Regulations describe as 'sensitive data,' such as that relating to health, ethnicity, political affiliation, or sexual orientation. However, we may inadvertently acquire such information as *obiter dicta* alongside other news of members, as when, for example, a relative asks us to cease sending newsletters to an old scholar because of their advanced dementia, or a member announces their marriage to a person who is clearly of the same sex. In the same way, while we do not seek to obtain information on your political affiliations, sending us a news item which declares that you have just been elected Chairman of the local Conservative Association might possibly allow us to make an educated guess as to what they might be.

We do not process the information we hold in any way which could be described as 'profiling' and there is no automated processing of your data.

How we use your data

Data on old scholars and former staff will be processed strictly in accordance with the GDPR and in the legitimate interests of the Club in order to:

- Communicate and promote the activities of the St Christopher Club and St Christopher School.
- Send invitations and information about forthcoming events and activities of the St Christopher Club and St Christopher School.
- Write and compile newsletters.
- Send newsletters, information, and/or other publications or merchandising which the Club may from time to time engage in.
- Make requests for news for the newsletter or any other assistance with the aims of the Club.
- Contact you in connection with the democratic processes of the Club, such as the nomination and election of Committee members.
- Contact you in order to put you in touch (should you wish) with other old scholars, or any person who has contacted us with a view to contacting you.
- Archiving material in connection with the writing of obituaries of deceased old scholars for the newsletter, or for historical purposes in connection with any research in years to come into the history of St Christopher School.
- Carry out any other tasks necessary for achieving the objectives of an alumni club.

How your information is held, and who has access to it:

Contact details of old scholars and former staff are held securely in a password protected database which is not networked or available via the internet. The data is normally only kept and used by the Club secretary, but may be made available to other members of the St Christopher Club Committee, or to any properly appointed "group conveners" for legitimate purposes, such as organising events or contacting specific groups. Older (and largely, but not wholly out of date) information is contained in former club address books, which may be widely disseminated among members.

Your contact details may from time to time be transferred to St Christopher School, for use in contacting old scholars and former staff directly in relation to events, appeals, the provision of information, and so on. The School will process the information with the same degree of security and care as the Club. A backup copy of the Club's database of contact details is stored securely in the Bursar's safe at the school to guard against loss of information should the original kept by the Club Secretary be destroyed. Archival material may be transferred to the School's archive and stored securely there.

Biographical information and references which identify you by name may be held among our archived material. This may include books which mention you by name (such as Reginald Snell's history of the school), biographies and autobiographies, reference copies of our own newsletters and of the former school magazines in which old scholars' information appeared, newspaper cuttings, photographs, internet articles, material you have sent us, and so on. This is kept securely and archived for historical purposes, and in due course for the writing of obituaries.

How long we keep your data

Much of the information we have is archival in nature, and is of relevance to future historians of St Christopher School, perhaps many decades in the future. Biographical information we may hold is intended for use in compiling obituaries when we learn of the decease of a member. Such information is therefore kept indefinitely, or at least until the member's decease. [We shall not, of course, keep any such biographical information on members who have exercised their 'right to be forgotten.' - see below.]

The limited material we store (detailed above) relating to your specific financial transactions with us - your subscriptions, payments for reunions, etc., may be held for ten years after you cease subscribing, or purchased the service, in order to allow investigation should any irregularity be alleged against the treasurer.

Our general records and accounts of financial transactions will be kept for the term of office of a treasurer plus ten years, in order to allow investigation should any irregularity be alleged against the treasurer. Bank statements and summary accounts presented to the AGM may be kept indefinitely.

Who to contact:

For any matter relating to these regulations, please contact the Data Controller for the Club, who is the Club Secretary.

David Cursons
The St Christopher Club
c/o St Christopher School
Letchworth
Herts, SG6 3JZ
club@oldscholars.info.

The right to see the information held on you:

Under the GDPR you have the right to see the data the Club holds on you, and to correct anything which is incorrect. We in fact take some pains to try to keep our information correct and up-to-date, and would very much welcome corrections. Please contact the Club Secretary as above.

The ‘right to be forgotten’ or not to be contacted:

You have the right to request us to ‘restrict processing.’ This is the technical term for asking us not to contact you, or not to contact you in certain ways - for example, you may ask us only to contact you by post and never by email. Or you may ask us not to contact you by any means. We have always complied with such requests, and will continue to do so. The Club is a social organisation run solely for the benefit of its members, and has never wished to intrude on anyone who does not wish to hear from us. If anyone has told us they do not want to have anything to do with St Christopher School or the Club, nor to hear from us ever again, we have been only too willing to strike them from the mailing list, and save our time and postage, and we shall continue to do so. Please just email us, or write to us, saying what you would like us to do, or not do.

You also have the right to request that all data on you be removed. This, however, is tempered by the Club and School’s right of freedom of expression and information, cases when data needs to be retained to comply with a legal requirement, or when data is used for archiving purposes in the public interest, scientific research, historical research (including genealogy) or statistical purposes.

As one of the original “progressive schools,” intimately connected with the foundation of the New Education Fellowship, and with several of its former staff or pupils being the subject of full biographies and/or archives collected in libraries and other places, and others the subject of public interest, the Club and School have archives of material of future historical and genealogical interest which extends well outside its walls. Information on who attended the school, and when, is part of that archive, just as state schools have normally archived their admissions registers at the local County Archives. In addition to archival requirements, to carry out its function with integrity and fairness, the Club needs to be able to identify anyone who contacts us as being a genuine and known St Christopher old scholar. (This is part of the assurance you have that you can give us personal information for our newsletters in the knowledge that they will not be sent to anyone not connected with St Christopher School.) For all these reasons, if you request that your data be removed we shall delete all information relating to your whereabouts, but shall retain the following archival data:

- Your name, gender, and date of birth (where known)
- In the case of former staff, the subject taught or other role, such as matron, houseparent, etc.
- The dates you were at St Chris.
- A note to the effect that you requested the rest of your data to be removed. (This is so a future Club Secretary does not attempt to ‘track you down’ via other public records, and so that we do not accept any offer of further information about you which may in the future be proffered by another person.)

This data will not be processed, but will be retained for archival purposes only. Should we later learn of your decease we shall then add the fact that you are deceased, and (if known) the date of decease.

We shall do what is reasonably practicable to delete all biographical information we may have on you, any correspondence we have had with you, and so on, but there may be a small amount of residual clues to your St Christopher existence, such as material you contributed to a school magazine, or your appearance within a whole school photograph, copies of which may be held by your contemporaries and/or in other collections, and which would naturally form part of the School and/or Club's general archival material, which is not personal to you.

Deceased persons do not have any rights over their data in law, according to the GDPR. However, it is nevertheless the Club's intention to behave like any responsible archive, and pass any personal information we may have on deceased members only to those with a reasonable reason for wishing to obtain biographical, historical or genealogical information on any particular individual.

The right to object.

If you object to what the Club has done, or to our policies as set out here, we would be most grateful if you would first take the matter up with us, so we can try to put matters right if an honest mistake has been made.

However this does not preclude your right to object to the Information Controller's Office.

The address of the Head Office of the ICO is

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Their website is www.ico.org.uk. This gives telephone numbers, addresses of regional offices in Scotland, Wales and Northern Ireland, and the email addresses of the various offices.