

# CITY JUNIOR SCHOOL

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## Privacy Policy

### Introduction

City Junior School is part of the City of London Corporation (CoL), and it is CoL that is registered with the Information Commissioner's Office as the Data Controller (registration number – Z5996206).

The Data Protection Officer is the CoL Comptroller and City Solicitor, who can be contacted at [information.officer@cityoflondon.gov.uk](mailto:information.officer@cityoflondon.gov.uk). For any queries or concerns, please contact [enquiries@cityjuniorschool.org.uk](mailto:enquiries@cityjuniorschool.org.uk).

### Overview

City Junior School is supported in its operations by City of London School and City of London School for Girls which are its parent schools and which are also part of the City of London Corporation. Data processed by City Junior School may therefore be processed within either of the parent schools.

To carry out its duties to pupils, parents and staff, City Junior School collects and processes personal data about individuals as part of its daily operation. The information in this Privacy Policy is provide in accordance with the rights of individuals under Data Protection Law to understand how their data is used.

Some of this activity the School will need to carry out in order to fulfil its legal rights, duties or obligations. Other uses of personal data will be made in accordance with the School's legitimate interests, or the legitimate interests of another, provided that these are not outweighed by the impact on individuals, and provided it does not involved special category or sensitive types of data. The School may also collect, process and store in the short-term, data pertaining to job applications, contractors, and expression of interest. The legal basis for processing and storing this information is legitimate business interest.

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## **What we collect**

If you wish to register interest in the School, we will require some personal information about you. This would include your title, name and email address in the first instance. This information allows the school to fulfil your request and keep you informed.

If you wish to register your child and become a parent or prospective parent at the School, we will request further information such as address, gender, telephone number for example.

Where payments are made to the School, details of payment card numbers and expiry dates will go through a secure server operated by the Schools payment service provider.

If you are a pupil or perspective pupil some of the information held will include your name, gender, nationality, date of birth, home address, email address, telephone number, start date, previous academic record, references, relevant medical information, attendance data, disciplinary records, learning support information, examination scripts and marks, images, images of you engaging in school activities and images captured by the School's CCTV.

## **How we collect information**

In most cases, the School receives personal data from the individual directly (including in the case of pupils from their parents). This maybe be a form or simply in the ordinary course of interaction or communication. However, in some cases personal data will be supplied by third parties (for example another school or other professionals or authorities working with that individual).

## **Why we need the information**

In the initial stage of registering interest, the School requires the information to keep you informed about upcoming events, and send news and updates.

As expressed in the Overview, once you enter into a formal relationship with the School at the point of registration and furthermore, acceptance, the School requires personal data to carry out ordinary duties to pupils and parents. The following uses fall into the category of 'ordinary duties':

- For the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents)

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- To provide education services, including musical education, physical training or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records)
- To enable relevant authorities to monitor the School's performance and to intervene or assist with incidents as appropriate
- To give and receive information and references about past, current and prospective pupils, including relating to outstanding fees or payment history, to / from any educational institution that the pupil attended or where it is proposed they attend; and to provide references to potential employers of past pupils
- To enable pupils to take part in national or other assessments, and to publish the results or other achievements of pupils of the School;
- To safeguard pupils' welfare and provide appropriate pastoral care
- To monitor (as appropriate) use of the School's IT and communications systems in accordance with the School's Acceptable Use Policies
- To make use of photographic images of pupils in school publications, on the School website and (where appropriate) on the School's social media channels. Where images are shared with third parties (e.g. the media, for promotional and congratulatory purposes), the pupil's full name will not appear with the photograph unless the permission of the pupil or parent (depending on the age of the pupil) has been sought. Pupils, parents and guardians should be aware that where photographs or other image recordings are taken by family members or friends for personal use, data protection legislation will not apply (e.g. where a parent takes a photograph of their child at a sporting event)
- For security purposes, including CCTV in accordance with the School's CCTV policy
- Where otherwise reasonably necessary for the School's purposes, including to obtain appropriate professional advice and insurance for the School. In addition, the School may need to process special category personal data (e.g. to support student welfare) or criminal records information (such as when carrying out DBS checks) in accordance with rights or duties imposed on it by law, including as regards safeguarding and employment, or from time to time by explicit consent where required. These reasons may include:

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- To safeguard pupils' welfare and provide appropriate pastoral (and, where necessary, medical) care, and to take appropriate action in the event of an emergency, incident or accident, including by disclosing details of an individual's medical condition where it is in the individual's interests to do so (e.g. for medical advice, social services, insurance purposes, or to organisers of school trips)
- To provide educational services in the context of any special educational needs of a pupil
- For legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with its legal obligations and duties of care.

## **How the law allows us to use your personal information**

There are several legal reasons why we will need to collect and use your personal information in different circumstances.

Generally, we collect and use personal information where:

- you, or your legal representative, have given consent
- you have entered into a contract with us
- it is necessary to perform our statutory duties or other legitimate purposes
- it is necessary to protect someone in an emergency
- it is required by law
- it is necessary for employment purposes
- it is necessary to deliver health or social care services
- you have made your information publicly available
- it is necessary for legal cases
- it is to the benefit of society as a whole
- it is necessary to protect public health
- it is necessary for archiving, research, or statistical purposes

## **Consent**

Where the School 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 may have another lawful reason to process the personal data in question even without your consent. That reason will usually have been asserted under this Privacy Policy or may otherwise exist under some form of contract or agreement with the individual (e.g. an employment or parent contract, or because a purchase of goods, services or membership of an organisation has been requested).

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## **Sharing your information**

Access to personal data is restricted to those members of staff who have a requirement to maintain a relationship with you, and is controlled through password protection and user security profiles. All School staff that are given access to personal data receive mandatory Data Protection training and have a duty to maintain confidentiality under the Data Protection Act. Access to special category data is restricted to key personnel and staff with such access receive a higher level of training.

Personal data is never sold to third parties.

Data may be shared with City of London School or City of London School for Girls if it is for legitimate interest purposes, and in the interest of the pupil.

In many circumstances we will not disclose personal data without consent. However, there may be occasions, such as pupils changing schools, when we will need to share personal information with the organisation concerned and with other relevant bodies.

Occasionally the school will need to share personal information relating to its community with third parties, such as professional advisers (lawyers and accountants) or relevant authorities (HMRC, police or the City of London Corporation, the local authority).

Information about employees may also be disclosed where required by law, or in connection with legal proceedings, or for the prevention / detection of crime, or assessment / collection of tax.

The School is required to disclose some personal data to the Department of Education and also may share personal data with third party organisations which carry out contracts on behalf of the School (such as a venue hosting a school event).

The School will only share personal data that is relevant and proportionate. All data processing activities are logged and reviewed from time to time.

Should a safeguarding issue arise, personal data may be shared after consultation with the DSL. Finally, 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, web developers 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.

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## Your rights

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the School, and in some cases ask for it to be erased or amended or for the School to stop processing it, but subject to certain exemptions and limitations. Any individual wishing to access or amend their personal data, or wishing it to be transferred to another person or organisation, should email their request to [enquiries@cityjuniorschool.org.uk](mailto:enquiries@cityjuniorschool.org.uk).

The School 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 one calendar month for all request relating to data protection matters. The School will be better able to respond quickly to smaller, targeted requests for information. If the request is manifestly excessive or similar to previous requests, the School may ask you to reconsider or charge a proportionate fee, but only where Data Protection Law allows it. You should be aware that certain data is exempt from the right of access. This may include information which identifies other individuals, or information which is subject to legal professional privilege.

A subject access request from a pupil at CJS may be considered if, in the opinion of the School, the pupil is of sufficient maturity. More usually, a person with parental responsibility will generally be expected to make a subject access request on behalf of pupils in this age group. However, the information in question is always considered to be the child's at law. A pupil of any age may ask a parent or other representative to make a subject access request on their behalf, and moreover (if of sufficient age) their consent or authority may need to be sought by the parent. All subject access requests from pupils will therefore be considered on a case by case basis.

The rights under Data Protection Law belong to the individual to whom the data relates. However, the School will often rely on parental consent to process personal data relating to pupils (if consent is required) unless, given the nature of the processing in question, and the pupil's age and understanding, it is more appropriate to rely on the pupil's consent. Parents should be aware that in such situations they may not be consulted, depending on the interests of the child, the parents' rights at law or under their contract, and all the circumstances. In general, the School will assume that pupils' consent is not required for ordinary disclosure of their personal data to their parent (e.g. for the purposes of keeping parents informed about the pupil's activities, progress and behaviour, and in the interests of the pupil's welfare) unless, in the School's opinion, there is a good reason to do otherwise. However, where a pupil seeks to raise concerns confidentially with a member of staff and expressly withholds their agreement to their personal data being disclosed to their parents, the School may be under an obligation to maintain confidentiality unless, in the School's opinion, there is a good reason to do otherwise (e.g. where the school believes disclosure will be in the best interests of the pupil or other pupils, or if required by law).

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Pupils are required to respect the personal data and privacy of others, and staff are under professional duties to do the same.

## **How long your information will be kept**

The School has a Data Retention policy. Please note that this is subject to periodical revision and the current moratorium, applicable to all schools, on the destruction of files (International Inquiry into Child Sexual Abuse) means data is being retained that would otherwise have been destroyed. If you have any specific queries or wish to request that personal data that you no longer believe to be relevant is considered for erasure, please contact [enquiries@cityjuniorschool.org.uk](mailto:enquiries@cityjuniorschool.org.uk).

## **Security**

Personal data is stored electronically in the School's MIS, IT Systems, and, in some instances, in paper record. Paper records of special category data and higher category sensitive information are kept under lock and key.

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the School of any changes to information held about them. An individual has the right to request that any inaccurate or out-of-date information about them is erased or corrected (subject to certain exemptions and limitations under Act; please see above). The School 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 systems. All Staff and Governors will be made aware of this policy and their duties under Data Protection Law and will receive relevant training.

## **Complaints**

Any comments or queries on this policy should be directed to the School at [enquiries@cityjuniorschool.org.uk](mailto:enquiries@cityjuniorschool.org.uk). If an individual believes that the School has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the School's complaints procedure and should also notify the School at [enquiries@cityjuniorschool.org.uk](mailto:enquiries@cityjuniorschool.org.uk). You can also make a referral to or lodge a complaint with the Information Commissioner's Office ([www.ico.org.uk](http://www.ico.org.uk)), although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.