

Privacy Notice

1. Identity and contact details

This notice describes how the City of London School, the City of London School for Girls and City Junior School (hereafter referred to collectively as “City Schools” and/or “the school”) collect and uses personal information about you, in accordance with the relevant legislation (“Data Protection Law”). The City of London Corporation is the Data Controller for the personal information processed by the Schools for the purposes of the relevant legislation. The Data Protection Officer for the City of London Corporation is also the Comptroller and City Solicitor Michael Cogher.

The City of London Corporation and the school processes personal data in accordance with the United Kingdom General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. For full details of how and why the City of London Corporation processes personal data, please refer to the full privacy notice at www.cityoflondon.gov.uk/privacy.

Please direct all data protection queries to the School’s Data Protection Lead
dataprotection@cityschools.org.uk

Alternatively, you may contact the Information Compliance Team at
information.officer@cityoflondon.gov.uk or in writing to PO Box 270, Guildhall London, EC2P 2EJ

This notice will be reviewed periodically and may be updated at any time, we will always inform you of any substantive changes to the way we process your data.

2. Overview

This privacy notice is intended to provide information about how the schools (hereafter referred to as ‘the school’) will use (or “process”) personal data about individuals including: staff or employees, its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as “parents”).

In order to carry out its ordinary duties to pupils and parents, the school needs to collect and process a wide range of personal data about individuals (including current, past and prospective staff, pupils or parents) as part of its daily operation. The school remains committed to maintaining high standards in its use of personal data and recognises that processing personal data in a secure and compliant manner is essential for the smooth operation of your child’s time at the school and beyond.

As the data controller for the school, the City of London Corporation, also has additional

privacy policies that cover processing of personal data in relation to employment matters for parties such as employees, contractors and suppliers. These are available via the City of London Corporation website (www.cityoflondon.gov.uk/privacy).

The School recognises that it has a duty to treat personal data responsibly and securely and in compliance with the Data Protection Act 2018. This information is provided to help individuals understand how their data is used. Parents and pupils are all encouraged to read this Privacy Notice and understand the school's obligations to them. This notice provides an overarching explanation as to what personal data we collect, the purposes for processing, categories of personal data and who we may share it with.

3. How we collect your personal data

Generally, the school receives personal data from the individual directly (including, in the case of pupils, from their parents). This may be via a form, or simply in the ordinary course of interaction or communication (such as email or written assessments). This could also be via face-to face interactions, telephone, social media.

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).

4. Purposes for processing your personal data

As described above we collect and process information about you, so that we can carry out our functions as a school. Some of this activity the school will need to carry out in order to fulfil its legal rights, duties or obligations – including those under a contract with staff or parents of its pupils.

Where parents, carers or other persons responsible for fees choose to provide their date of birth, the school will process this information on the basis of their consent. This information will be used only for proportionate identity verification, anti-fraud, anti-money laundering, sanctions and financial compliance checks connected with fee payments, refunds, bursaries or other financial arrangements. Parents may withdraw this consent at any time by contacting the School's Data Protection Lead.

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 involve special or sensitive types of data.

The school expects that the following uses will fall within that category of its "legitimate interests":

- for the purposes of pupil selection (and to confirm the identity of prospective pupils and their parents);
- to communicate with parents/carers;
- to provide education services, including musical education, physical training, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- for the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law (such as tax, diversity or

- gender pay gap analysis);
- 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 of public examinations or other achievements of pupils of the school;
- to safeguard pupils' welfare and provide appropriate pastoral care including meeting legal obligations;
- to monitor (as appropriate) use of the school's IT and communications systems in accordance with the school's IT acceptable use policy;
- 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 in accordance with the school's policy on taking, storing and using images of children. On occasion, images may include pupils from more than one of the City Schools;
- for security purposes, including CCTV in accordance with the school's CCTV policy, if applicable;
- to provide lunch services to pupils and staff, including the use of biometric data in accordance with the school's policy on the use of biometric data;
- to provide information to parents about events at the school including fundraising events and initiatives;
- maintaining relationships with former pupils and the school community, including direct marketing or fundraising activity. City of London School and City of London School for Girls have separate Privacy Policies for Alumni and these can be viewed upon request. Please email dataprotection@cityschools.org.uk
- to carry out or cooperate with any school or external complaints, disciplinary or investigation process;
- where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

Special Category data

In addition, the school will on occasion need to process special category personal data (concerning health, ethnicity, religion, biometrics or sexual life) in accordance with rights or duties imposed on it by law, including as regards safeguarding, or from time to time by explicit consent where required. These reasons will include:

- 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 or other relevant information where it is in the individual's interests to do so: for example for medical advice, for social protection, safeguarding, and cooperation with police or social services, for insurance purposes or to caterers or organisers of school trips who need to be made aware of dietary or medical needs;
- to provide educational services in the context of any special educational needs of a pupil;
- to run any of its systems that operate on biometric data, for example, to pay for school lunches;

- as part of any school or external complaints, disciplinary or investigation process that involves such data, for example if there are SEN, health or safeguarding elements;
- 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;
- financial data, for the purpose of administering school payments including, but not limited, to school fees, school trips, pupil lunch accounts.

5. Types of personal and special category data processed by the school

This will include, by way of example:

Personal data

- names, dates of birth where provided, addresses, telephone numbers, e-mail addresses and other contact details and contact details for their next of kin;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- references given or received by the school about pupils, and relevant information provided by previous educational establishments and/or other professionals or organisations working with pupils;
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system and images stored on the school's Management of Information System (in accordance with the school's policy on taking, storing and using images of children).

Special Category data

- biometric information, which may be collected and used by the school in accordance with the school's biometrics policy, if applicable;
- where appropriate, information about individuals' health and welfare;
- Social demographic data e.g. racial or ethnic origin, religious or philosophical beliefs, sexual life or sexual orientation, for the purpose of analysis.

Financial data

- bank details and other financial information, e.g. about parents who pay fees to the school.
- basic identifying information about parents, carers or other persons responsible for fees, such as date of birth where provided by consent, where this is used for identity verification, anti-fraud, anti-money laundering, sanctions or other financial compliance checks.

6. Principles for processing personal and special category data

Where the school processes personal and data we will take all appropriate actions to ensure that the data protection principles as outline in the Data Protection Act 2018 are met, this includes ensuring that all personal and special category data:

- is processed lawfully, fairly and in a transparent manner;
- is collected for a specific and legitimate purpose and will not be used for any purposes that is incompatible with this purpose;
- is adequate relevant and limited to what is necessary;
- accurate and where necessary kept up to date;
- stored for as long as necessary for the purposes that the data was gained and in line with our retention policies;
- is kept secure.

7. The Lawful basis on which we process the personal data

The personal data processed by the School will only be processed when there is a legal basis to do so. Processing will only take place in one or more of the following circumstances:

- We have received your consent.
- The processing is necessary for the performance of a contract;
- The processing is necessary for compliance with a legal obligation;
- The processing is necessary to protect the vital interests of the individuals;
- The processing is necessary for the performance of a public task;
- The processing is necessary for the purpose of legitimate interests.

Where we ask parents, carers or other persons responsible for fees to provide their date of birth for identity verification, anti-fraud, anti-money laundering, sanctions or financial compliance checks, we rely on consent under Article 6(1)(a) of the UK GDPR.

Where your special category data is processed, processing will take place in one or more of the following circumstances:

- We have received your explicit consent;
- Processing is necessary for the purposes of carrying out obligations and exercising specific rights of the controller or individual in the field of social protection law;
- Processing is necessary to protect the vital interests of the individual;
- Processing relates to personal data which is made public by the individual;
- Processing is necessary for the establishment, exercise, or defence of legal claims;
- Processing is necessary for the purposes of archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.

8. Consent

Where the school is relying on consent as a means to process personal data, any person may withdraw this consent at any time (subject to similar age considerations as above). Examples where we do rely on consent are: biometrics, certain types of uses of images, certain uses of medical information for instance on school trips. This includes consent given by parents, carers or other persons responsible for fees for the school to process their date of birth for identity verification, anti-fraud, anti-money laundering, sanctions or financial compliance checks. Withdrawal of consent will not affect the lawfulness of any processing carried out before consent was withdrawn. Please be aware however that the school may not be relying on consent but 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 Notice, 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 such as an alumnae or parents' association has been requested).

9. Who has access to personal data and who the school shares it with

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);
- government authorities (e.g. HMRC, DfE, police or the local authority);
- appropriate regulatory bodies e.g. the Independent Schools Inspectorate, or the Information Commissioner;
- banks, regulated fraud-prevention agencies, financial compliance providers or similar organisations, where this is necessary for the checks described above and where the relevant consent has been given;

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 of access apply in the context of:

- medical records held and accessed only by the school nurse, or otherwise in accordance with express consent. Medical information is shared between the three schools to ensure pupil safety and wellbeing;
- pastoral or safeguarding files. Safeguarding files are restricted access. However, information regarding pastoral concerns and safeguarding and child protection concerns may be shared confidentially with other members of staff on a 'need to know' basis.

However, a certain amount of any SEN pupil's relevant information will need to be provided to staff more widely in the context of providing the necessary care and education that the pupil requires.

Personal data may also be shared with Parent Groups (for example, Friends of CLS/CLSG, CJS PFA) for legitimate interest purposes and to facilitate social events involving the Parent body.

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.

These instances of sharing personal data will only occur when it is necessary and where the law and/or our policies permit us to do so.

10. How is data stored

Personal data is stored electronically in the school's MIS, IT systems, including cloud-based storage and, in some instances, in paper record. Paper record special category data and higher category sensitive information is kept under lock and key.

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 receive relevant training.

11. How long we keep personal data

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. Typically, the legal recommendation for how long to keep ordinary staff and pupil personnel files is up to 7 years following departure from the school. However, incident reports and safeguarding files will need to be kept much longer, in accordance with specific legal requirements.

Date of birth information provided by parents, carers or other persons responsible for fees for financial compliance checks will be retained only for as long as necessary for those purposes and in line with the school's retention policies, unless consent is withdrawn earlier and there is no other lawful reason to retain it.

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 us (dataprotection@cityschools.org.uk) However, please bear in mind that the school will often have lawful and necessary reasons to hold on to some personal data even following such request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where 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").

12. Your rights

All 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 have it transferred to others, or for the school to stop processing it – but subject to certain exemptions and limitations.

You can ask us to:

- inform you as to how your personal data is processed;
- provide you with a copy of the personal information that we hold about you;
- correct personal information about you which you think is inaccurate;
- delete personal information about you if you think we should no longer should be using it;

- stop using your personal information if you think it is wrong, or until it is corrected;
- transfer your personal information to another provider in a commonly used format;
- not use automated decision-making processes to make decisions about you.

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 the school, using the following details:

- dataprotection@cityschools.org.uk Schools Data Protection Lead
- Alternatively, you may contact the Information Compliance Team at information.officer@cityoflondon.gov.uk or in writing to PO Box 270, Guildhall London, EC2P 2EJ

13. Links to other websites

This privacy notice does not cover the links within this site to other websites or referenced in this notice. We encourage you to read the privacy notices on other connected websites that you might visit.

14. Information outside of the United Kingdom

The majority of personal information is stored on systems in the UK or EU. However, there are some occasions where your information may leave the UK/EU either to get to another organisation, or where it is stored in a system outside of the EU. We have additional protections on your personal information if it leaves the UK ranging from secure ways of transferring data to ensuring we have a robust contract in place with that third party.

15. Queries and complaints

Any comments or queries on this policy should be directed to the Schools Data Protection Lead (dataprotection@cityschools.org.uk).

If you believe that the School has not complied with this Privacy Notice or acted otherwise than in accordance with data protection law, you should email the Schools Data Protection Lead (dataprotection@cityschools.org.uk) with details of your complaint. The School will acknowledge your complaint within 30 days of receipt and will investigate and inform you of the outcome of your complaint without undue delay (keeping you informed of progress as necessary).

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.

For independent advice about data protection, privacy and data sharing issues, you can contact the Information Commissioner's Office (ICO) at:

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

0303 123 1113 (local rate) 01625 545745 (national rate number) or at www.ico.org.uk

16. Version control and updates

The school 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.

Version number: 6

Last Updated: May 2026

Next review due: June 2027