

<b>Policy</b>	<b>Privacy Notice</b>		
<b>Reviewer</b>	Patrick Crossley, Deputy Headteacher		
<b>Reviewed</b>	30 June 2022	<b>Next review</b>	Summer Term 2024
<b>Changes</b>			

Victoria College Jersey, School is registered as a Data Controller under the Data Protection (Jersey) Law 2018 (“the law”) as we collect and process personal information about you. We process and hold your information in order to provide educational services and meet our statutory obligations under the Education (Jersey) Law, 1999.

This privacy notice explains what information we collect and why we need this information, how we use (or “process” it), why we may need to share it, and the rights you have with regard to this collected information. Information may be collected on a paper or online form, by telephone, email, or by a member of our staff, or in some cases, by another Government of Jersey department. We collect information about individuals including our pupils (current, prospective and past- noting that information relating to Alumni is maintained by the OVA), parents/ guardians and our staff.

Pupil data is essential for Victoria College to operate. Whilst the majority of the data requested is mandatory i.e. collected in order to fulfil our legal rights, duties and obligations to include contracts between the school and parties mentioned in this privacy notice, some of it may be requested on a voluntary basis (for example in respect of bursary applications). In order to comply with the law we will inform you at point of collection whether you are required to provide this information or if you have a choice. Your personal data may also be collected and processed in accordance with Victoria College’s legitimate interests, or the legitimate interests of another body.

We will continually review and update this privacy notice to reflect changes in our services, the technology we use, requests for information from CYPES or other Governmental departments and feedback from service users, as well as to comply with changes in the law.

### **What information do we collect about you?**

We collect the following types of information about you.

Personal identifiers and contacts:

- Name of child and parent / carer
- Date of birth of child
- Address of child and parent / carer
- Contact details – phone, email

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- Child DOB
- Child gender
- Verification of birth (i.e. copy of birth certificate, seen not collected)

Other characteristics:

- Ethnicity
- Languages spoken
- Jersey premium information
- Safeguarding information (such as parental responsibility, professional involvement, court orders, restrictions relating to parental involvement etc)
- Medical information that is relevant to child (GP surgery details, child health, dental health, allergies, medication and dietary requirements)
- Special educational needs
- Attendance records
- Assessment and attainment (to include at previous schools)
- Behavioural information
- Bank account details (for staff members where relevant)
- Social security number (for staff members where relevant)
- Employment history (for staff members and where applicable parents in respect of bursary or other financial assistance applications)
- Financial information (where applicable for bursary applications)

Moving images:

- CCTV video images
- Recordings of Teams/ Zoom calls where applicable

### **Why do we collect information about you?**

We collect and use pupil information for the following purposes:

- Stay in touch with you
- Verify you are who you say you are
- Answer any queries with respect to your child's education promptly and satisfactorily
- Handle your application (for inclusion in the school, as a prospective staff member or with respect to bursary or financial support)
- Provide you with information you need in respect of your child's education

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- Carry out the educational service we provide, and to monitor and improve our performance in respect of our duties and responsibilities under the Education (Jersey) Law, 1999.
- To support pupil learning
- To monitor and report (to you and other stakeholders) in respect of pupil attainment progress
- To provide appropriate pastoral care and support families of pupils
- To keep children safe (food allergies, emergency contact details or safeguarding matters)
- To assess the quality of the educational provision and allow the statistical analysis of data so we can continue to improve and further plan the provision of educational services

### **How will we use the information about you?**

We will use the information you provide in a manner that conforms to the Data Protection (Jersey) Law 2018. The law requires that we only process personal information where certain conditions are satisfied. The processing of such data should be fair, transparent, for a specified legitimate purpose, and limited to the personal information necessary to fulfil this purpose. We will only request information in relation to the requirements above which all have legitimate purpose in ensuring that we fulfil our legal obligations in the provision of education.

We will endeavour to keep your information accurate and up to date and not keep it for longer than is necessary. Victoria College will retain personal data securely utilising the Government of Jersey IT systems and controls and will only keep this personal data for a legitimate and lawful reason for however long it is necessary and in any event in accordance with the Government of Jersey retention policy.

We may not be able to provide you with a service unless we have enough information or your permission to use that information.

We will not pass any personal data on to anyone outside of the Government of Jersey, other than those who either process information on our behalf, for safeguarding matters, or because of a legal or statutory requirement, or in the interests of your child (for example with respect to the transfer of your child to another educational establishment falling outside the remit of the Government of Jersey). We will only do so, where possible, after we have ensured that sufficient steps have been taken by the recipient to protect your personal data.

We will not disclose any information that you provide 'in confidence', to anyone else without your permission, except in the few situations where disclosure is required by law, or where we have good reason to believe that failing to share the information would put someone else at risk. You will be told about this unless there are exceptional reasons not to do so.

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We do, on the odd occasion, process your information overseas using web services that are hosted outside the European Economic Area, for example Facebook. This is processed in the US but has been approved by another competent supervisory authority under Article 40 of the GDPR or equivalent statutory provisions, together with binding and enforceable commitments of the controller and processor to apply the appropriate safeguards such as information security procedures and checks.

We upload children's data to the MiS (Sims Database) that is hosted in the European Union. In addition, children's data may be uploaded to GL Assessments, School Pupil Tracker Online EExAT and is synched to MyConcern for safeguarding purposes. A small amount of personal data is also stored (name, email address) on Pearson Education and parent / carer contact data on Teachers to Parents. All of these services are hosted within the European Union. To understand how this information is processed in more detail please read Appendix A.

## **Data Sharing**

We may need to pass your information to other Government of Jersey (GOJ) departments or organisation to fulfil your request for a service. These departments are Skills Jersey, Health, Social Services, Social Security, Multi trust agencies. These departments and organisations are obliged to keep your details securely, and only use your information for the purposes of processing our service request. Please read Appendix B for a list of organisations your data is shared with and how.

We may disclose information to other departments where it is necessary, either to comply with a legal obligation, or where permitted under other legislation. Examples of this include, but are not limited to: where the disclosure is necessary for the purposes of the prevention and/or detection of crime; for the purposes of meeting statutory obligations; or to prevent risk of harm to an individual, etc.

We may need to share personal information with professional advisers or other schools that provide education to pupils on Victoria College's role. For example, in sixth form Victoria College, Jersey College for Girls, Beaulieu Convent School and De La Salle College provide certain A Level and BTEC course as a collective.

At no time will your information be passed to organisations for marketing or sales purposes or for any commercial use without your prior express consent.

## **Publication of your information**

We may need to publish your information on our website and/or in the Jersey Gazette for the following reasons:

- Where we are required by law to publicise certain information, for example performance data.
- In the interests of demonstrating a fair and transparent decision-making process, for example admissions process and appeals procedure.
- Where we are required to provide statistical information about a group of people; although your data will be anonymised to protect your identify.

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## **E-Mails**

If you email us we may keep a record of your email address and a copy of the email for record keeping purposes.

For security reasons we will not include any confidential information about you in any email we send to you. We would also suggest that you keep the amount of confidential information you send to us via email to a minimum or use our secure online services where possible or correspond with us by post or face to face especially where it concerns sensitive data pertaining to your child

We will not share your email address or your email contents unless it is necessary for us to do so; either to fulfil your request for a service; to comply with a legal obligation, or where permitted under other legislation.

## **Telephone Calls**

We do not record or monitor any telephone calls you make to us using recording equipment, although if you leave a message on our voicemail systems your message will be kept until we are able to return your call or make a note of your message. File notes of when and why you called may be taken for record keeping purposes. We will not pass on the content of your telephone calls, unless it is necessary for us to do so; either to fulfil your request, or in respect of educational or safeguarding requirements; to comply with a legal obligation, or where permitted under other legislation.

## **Your rights**

### **You can ask us to stop processing your information**

You have the right to request that we stop processing your personal data.. However, this may cause delays or prevent us providing the educational provision to your child, or in respect of staff members any human resource or payroll services. Where possible we will seek to comply with your request, but we may be required to hold or process information to comply with a legal requirement.

### **You can withdraw your consent to the processing of your information**

In the few instances when you have given your consent to process your information, you have the right to withdraw your consent to the further processing of your personal data. However, this may cause delays or prevent us providing educational provision to your child. We will always seek to comply with your request, but we may be required to hold or process your information in order to comply with a legal requirement.

### **You can ask us to correct or amend your information**

You have the right to challenge the accuracy of the information we hold about you and request that it is corrected where necessary. We will seek to ensure that corrections are made not only to the data that we hold but also any data held by other organisations/parties that process data on our behalf. Periodically we will send out requests to update or confirm data provided to us previously and held on our records. We do this to ensure that information held about you is accurate and current.

### **You request that the processing of your personal data is restricted**

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You have the right to request that we restrict the processing of your personal information. You can exercise this right in instances where you believe the information being processed is inaccurate, out of date, or there are no legitimate grounds for the processing. We will always seek to comply with your request, but we may be required to continue to process your information in order to comply with a legal requirement.

### **You can ask us for a copy of the information we hold about you (a data subject access request)**

You are legally entitled to request a list of, or a copy of any information that we hold about you. However, where our records are not held in a way that easily identifies you we may not be able to provide you with a copy of your information, although we will do everything we can to comply with your request.

A pupil may make a subject access request if they are over the age of 13. Victoria College will determine whether that child has sufficient maturity to understand the request and in any event will consult with the person with parental responsibility. Conversely should a parent wish to make a subject access request where the pupil is over the age of 13 then the child's authority must be sought.

If you have questions about information in this privacy notice or your rights you can contact Victoria College's data protection officer Patrick Crossley (email : [p.crossley@vcj.sch.je](mailto:p.crossley@vcj.sch.je) )

### **Complaints**

If you have an enquiry or concern regarding the processing of your personal data please contact:

Headteacher, Dr Gareth Hughes

Telephone: 01534 638200

Email: [htpasecretary@vcj.sch.je](mailto:htpasecretary@vcj.sch.je) Victoria College

Mont Millais, St Helier, Jersey JE1 4HT

In the event that we are unable to satisfactorily address your query or concern Jersey Office of the Information Commissioner can be contacted in the following ways:

Telephone: +44 (0)1534 716530

Email: [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)

Jersey Office of the Information Commissioner, 2<sup>nd</sup> floor, 5 Castle Street, St Helier, Jersey JE2 3BT

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## APPENDIX A – Organisations that Process Data

Victoria College Jersey is registered as a ‘Controller’ under the Data Protection (Jersey) Law 2018 as we collect and process personal information about you. We process and hold your information in order to provide public services and meet our statutory obligations. Our Privacy notice explains how we use and share your information.

Victoria College, Jersey process data utilising or has an agreement with the following organisations;

- Sims (MiS Database) (A);
- GL Assessments (B);
- Examining boards including AQA, OCR, Pearson, CIE, WJEC (C);
- Dynamic Learning (D);
- In Touch (E);
- EntrySign; (F);
- Social Media (Facebook, Twitter) (G);
- SMHW (Show My Homework) (H).

Reasons why we process data:

- (A) – To hold the student record file, for statutory obligations, to ensure that we meet our legal obligations; to track and monitor a child’s academic and pastoral progress, provide you with information you need;
- (B) - For statutory obligations including providing examination information for students to be to collect their examination results in addition to tracking and monitoring of examination progress;
- (C) - For statutory obligations including providing examination information for students to be to collect their examination results in addition to tracking and monitoring of examination progress;
- (D) - To utilise appropriate online teaching and learning tools; for statutory obligations within teaching, for tracking and monitoring of children’s learning;
- (E) – To communicate effectively with you; to provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request;
- (F) – To ensure parent, visitor, pupil and staff sign in and sign out protocols are in place, and in the event of any request from Environmental Health for Covid-19 contact tracing purposes;
- (G) - To communicate celebration and relevant information effectively with you; to provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request;
- (H) - To communicate effectively with you; to provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request;

We will continually review and update our sharing agreements to reflect changes in our services and feedback from service users, as well as to comply with changes in the law.

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## APPENDIX B – Data Sharing with Organisations

Victoria College Jersey is registered as a ‘Controller’ under the Data Protection (Jersey) Law 2018 as we collect and process personal information about you. We process and hold your information in order to provide public services and meet our statutory obligations. Our Privacy notice explains how we use and share your information.

Victoria College, Jersey share data with the following organisations;

- Departments within the States of Jersey (A);
- The Police (B);
- Health Services included CAMHS, MASH, MARAC and JMAPP (C);
- Social Services (D);
- Social Security (E);

Reasons why we share data within the States of Jersey:

- (A) – For statutory obligations, for verification purposes, to provide you with the information you need, to answer your query, to approve financial transactions of bursaries; to allow the statistical analysis of data so we can plan the provision of services; To ensure that we meet our legal obligations;
- (B) - To prevent and detect crime; for statutory obligations, where necessary to protect individuals from harm or injury; where necessary for our law enforcement functions;
- (C) - For statutory obligations, to ensure that we meet our legal obligations; where necessary to protect individuals from harm or injury; provide you with information you need;
- (D)- For statutory obligations, to ensure that we meet our legal obligations; where necessary to protect individuals from harm or injury; provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request;
- (E) – To provide you with information you need; carry out the service you have requested, and to monitor and improve our performance in responding to your service request;

We will continually review and update our sharing agreements to reflect changes in our services and feedback from service users, as well as to comply with changes in the law.

**Please contact the Office of the Information Commissioner (Jersey) (JOIC) with any questions.**

Email: [enquiries@jerseyoic.org](mailto:enquiries@jerseyoic.org)

Address: 2nd Floor  
5 Castle Street  
St. Helier Jersey  
JE2 3BT

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