

This policy is of relevance to all Junior Guildhall Parents/Guardians, students, staff and all external professionals and freelancers (including but not limited to external examiners, adjudicators, conductors, coaches and freelance lecturers, tutors, visitors & guests)

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Approved by	Alison Mears
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The Guildhall School is committed to upholding your privacy and taking care with the personal information that you may give to us. From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulations (or GDPR for short).

The Guildhall School commits to holding your data securely and treating it with sensitivity.

This Notice explains how the Guildhall School will collect and use your personal data.

We will never sell your information to a third party.

We may need to disclose your information if required to by law.

Specific Privacy Notice

The Guildhall School, of which Junior Guildhall is a part, is a department of the City of London Corporation (“the City of London”). This specific privacy notice covers activities relating to Junior Guildhall and is a part of the School’s overarching privacy notice found on the website www.gsmd.ac.uk

The Guildhall School is committed to protecting your privacy; this privacy notice explains how we use information about you and how we protect your privacy. If you have any concerns or questions about how the School looks after your personal information please contact the City of London’s Data Protection Officer, also the Comptroller and City Solicitor, Michael Cogher, at information.officer@cityoflondon.gov.uk or alternatively

contact the Administrative Manager for Junior Guildhall at junior@gsmd.ac.uk or on the website listed above.

Activities unique to Junior Guildhall covered by this notice:

- The provision of under-eighteen educational activities at the Barbican and at partner organisations e.g. Felsted School.
- The provision of knowledge exchange events
- The scope of this document covers all Junior Guildhall activities, including enquirers, applicants, students, parents and/or guardians and staff for the purposes of the core student and staff records. It also covers other external users involved in the process e.g. external examiners. NB Staff should be aware that matters relating to their activities are covered by the separate H.R Privacy Notice available on the website www.gsmd.ac.uk

What personal data is collected about you

We may collect your data in a variety of ways, for example:

- When you communicate with us by telephone, email or via our websites
- When you use forms to provide data e.g. on application or enrolment
- When you supply additional documentation e.g. qualification certificates or evidence of identity
- As part of processes related to an enquiry, application for any course/programme administration purpose
- As part of a process for the good management of the School community, e.g. appeal, complaint, disciplinary process
- From third parties e.g. Agents
- When you supply additional documentation

We may collect personal data, for example:

- Biographical information including your name, gender and date of birth
- Contact details and communication preferences such as your address, email and phone number
- NI number, HMRC Unique Taxpayer Reference number, passport number and identity details, domicile and nationality, demographic information.
- Photo for identification e.g. I.D. Cards
- Video recordings (including CCTV)
- Production, performance and rehearsal photography
- Education and employment history including references

- Family or personal circumstances and extracurricular interests e.g. for assessment of suitability for funding or support.
- Family and parent/guardian details where relevant to our needs
- Financial information where appropriate e.g. for applying for funding support
- Your enquirer and applicant history and student record
- Course and stage details
- Attendance, progress and status
- Assessment results
- Bank details for processing invoices
- To meet statutory or regulatory reporting and/or monitoring requirements
- Specific consent will be required for under-16 participants and students

We may also collect special category data (previously ‘sensitive’)

- For support and statutory/monitoring reporting: disability, health and medical conditions, racial or ethnic origin, religion or similar beliefs, sexual orientation
- For admission and safeguarding purposes e.g. criminal convictions,
- For statutory monitoring and reporting purposes:

Personal information relating to criminal offences and convictions is also collected and although not ‘special category data’, is still sensitive in nature and merits higher protection. This would be collected for admission and safeguarding purposes.

Additional personal data may be collected where relevant in relation to placements, extenuating circumstances, professional body requirements, appeals/complaints/disciplinary cases and any further optional student services.

Reasons why we use your personal data

Specific list of uses by category:

- a. Recruitment and admissions
- b. Enrolment of students
- c. Teaching and Learning activities at the School
- d. Academic matters
 - i. Assessment and progression
 - ii. Core teaching and learning and academic conduct
 - iii. Awards and graduation
 - iv. Maintaining student records
 - v. Assessing eligibility for funding
- e. IT and information services including email addresses

- f. ID cards including photo
- g. AV/Video Recordings
- h. Support services including disability support, counselling, health & welfare advice
- i. Events and activities organised for students e.g. student performance activities in the School & at external performance venues
- j. Monitoring equal opportunities
- k. Monitoring and evaluating widening participation activity and participants to gauge long term success
- l. Safeguarding e.g. DBS checks
- m. Social media
- n. Fees, funding and debt recovery
- o. Immigration management and compliance
- p. Other admin
 - i. Statistical analysis and research
 - ii. Returns and surveys for government bodies
 - iii. Audits
 - iv. Operational information e.g. IT support, building closures, safety
 - v. Promoting services
 - vi. Safety of individuals and assets including use of CCTV
 - vii. Preventing crime
 - viii. Complaints, appeals and disciplinaries
 - ix. Enquiries
- q. When necessary to protect your or another person's vital interests

Why we are allowed to use your personal data

The processing of your personal information for the above purposes is necessary:

- To interact before enrolment as part of enquiries and admissions process
- To meet our contractual obligations to you as a student
- To meet our legal obligations
- To perform tasks we carry out in the public interest (e.g. teaching and research)
- For legitimate interests (e.g. to enable your access to external services)
- To protect your vital interests and/or those of another person(s)

We may also share your personal information when we consider/believe that there is a good reason to do so, which is more important than protecting your privacy. This doesn't happen often, but in these circumstances, we may share your information:

- To find and stop crime and fraud;
- If there are serious risks to the public, our staff or to other professionals;

- To protect a child;
- To protect adults who are thought to be at risk, for example if they are suffering from a mental health crisis

For all of these reasons, the risk must be serious before we can override your right to privacy.

If we are worried about your physical safety, the safety of others, or feel we need to take action to protect you or others from being harmed in other ways, we will, if possible, discuss this with you and get your permission to tell others about your situation before doing so.

If this is the case, we will make sure that we record what information we share and our reasons for doing so. We will let you know what we have done and why, if we think it is safe to do so.

For any specific use of your personal information outside these reasons we will ask for your consent and inform you how you can withdraw consent at any time.

If you have given your explicit consent we may share marketing materials including information about upcoming events, courses, performances and other activities, our news, and other ways you can get involved with the School. Where you have provided your postal address, we may send this information to you by post unless you have told us not to. We may also email you this information if you have agreed for us to do so.

If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time. If you want to remove your consent, please see our website Privacy Notice for contact details.

How do we protect your personal information?

We have a legal duty to make sure we hold your personal information (on paper and electronically) in a secure way, and to only make it available to those who have a right to see them. Examples of our security include:

- Encryption, meaning that information is hidden so that it cannot be read without special knowledge (such as a password)
- Controlling access to systems and networks to stop people who are not allowed to view your personal information from getting access to it

- Training for our staff to make them aware of how to handle personal information, and how and when to report when something goes wrong with mandatory data protection training for all staff accessing the School's databases

Who we can share your personal data with

Your data will be used by staff and contractors within the Guildhall School for the purposes specified.

Once you leave Junior Guildhall you will become a lifelong member of our alumni community.

Using the details you have provided our alumni team will continue to contact you via post and with appropriate opportunities by phone. They will also ask your permission to contact you via email.

The Guildhall School is a department of the City of London Corporation and shares the same data controller. Where services are provided by central City of London departments or shared with other departments within the City of London, your data may also be shared with those departments.

For example this may include:

City of London Finance and Procurement Services: your financial account with the School is held by the City of London. Any records of bank details that are sent between the School and the City of London will be transferred securely.

Internal auditors: For the purpose of auditing the services provided by the School, personal data may be processed by internal auditors, however any data that may need to be removed from the School will be anonymised first.

Other shared departments include Facilities and Performance Venues.

Your data may additionally be shared with:

- Funders and/or sponsors e.g Funders of any awards or prizes
- PayPal – We use Paypal to take secure online payments. The data sent between the School and Paypal includes identification information, payment requirements and details of whether the transaction was successful. No financial information (debit/credit card details or bank details from your Paypal account) is shared with the Guildhall School. Contact: Finance@gsmd.ac.uk 020 7382 7208. All payments are

normally non-refundable. Please see relevant policies for full details of payment conditions.

- External examiners and individuals involved in relevant School committees and procedures
- Current and potential education providers
- Partners in programme delivery where relevant
- External auditors
- Confirm and verify details of results awarded
- References to third parties which may be overseas (must always have explicit consent)
- Our bank to process payments
- Cloud Hosted systems e.g. Asimut (room booking), Symphony (library system)
- Tribal – technical support requiring access to database
- Relevant Government Departments
- Relevant executive agencies or non-departmental public bodies e.g. UK Visas and Immigration
- Organisations running student and leaver surveys (unless requested otherwise)
- Independent Safeguarding Authority
- Parents, guardians and next of kin, where there is a legitimate reason for disclosure
- Police and law enforcement agencies
- Emergency services

External systems administrators for which we have a contract e.g.

- Asimut (externally hosted timetabling system)
- Tribal (managed service contract for SITS student records system)

Situations when your personal data might be sent to other countries include:

- When the School uses third-party software
- Online video channels e.g. YouTube

We may seek additional consent for:

- Use of photography and other image recording for under-16s.

How long we keep your personal data for

- Personal data will be processed in accordance with the Junior Guildhall record retention policy

- Production, performance and rehearsal photography and recordings may be retained indefinitely in order to maintain your academic record for archiving and historical purposes
 - Financial records will be kept for the statutory period
 - Some information may be retained indefinitely in order to maintain your academic record
 - Junior Guildhall has a record retention policy for students and staff available on the website
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Appendix 1 - Categories of person (not exhaustive) – each may have specific categories or examples

1. Students
2. Parents and/ or guardians
3. Professional contacts e.g. external professionals and freelancers (including but not limited to external examiners, adjudicators, conductors, coaches and freelance lecturers, tutors, visitors & guests)
4. Online applicants not included above
5. Enquirers not included above
6. User accounts not included above (e.g. incomplete applications)
7. Next of Kin and Emergency Contacts (linked to the above as appropriate)
8. Referees