



Board of Governors of the City of London School for Girls

Date: MONDAY, 18 JUNE 2018

Time: 11.00 am

Venue: COMMITTEE ROOMS, WEST WING, GUILDHALL, EC2P 2EJ

Members:

Deputy Clare James	Deputy Tom Hoffman
Nicholas Bensted-Smith	Ann Holmes
Professor Anna Sapir Abulafia (External Member)	Deputy Robert Merrett
Rehana Ameer	Sylvia Moys
Randall Anderson	Elizabeth Phillips (External Member)
Tijs Broeke	Deputy Richard Regan
Deputy Roger Chadwick (Ex- Officio Member)	Alderman William Russell
Emma Edhem	Chairman of the City of London School (Ex-Officio Member)
Dr Stephanie Ellington (External Member)	Sir Michael Snyder
Soha Gawaly (External Member)	

Enquiries: Alistair MacLellan / alistair.maclellan@cityoflondon.gov.uk

N.B. Part of this meeting may be subject to audio-visual recording.

**John Barradell
Town Clerk and Chief Executive**

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **COURT ORDER**
To receive the Order of the Court of Common Council dated 19 April 2018 appointing the Board of Governors for 2018/19.

For Information
(Pages 1 - 2)
4. **ELECTION OF CHAIRMAN**
To elect a Chairman in line with Standing Order 29.

For Decision
5. **ELECTION OF DEPUTY CHAIRMAN**
To elect a Deputy Chairman in line with Standing Order 30.

For Decision
6. **MINUTES**
To agree the public minutes and non-public summary of the meeting held on 26 February 2018.

For Decision
(Pages 3 - 6)
7. **SUB-COMMITTEE MINUTES**

For Information

 - a) Reference Sub-Committee - 26 February 2018 (Pages 7 - 8)
To receive the public minutes of the Reference Sub-Committee meeting held on 26 February 2018.
 - b) Reference Sub-Committee - 23 May 2018 (Pages 9 - 10)
To receive the draft public minutes of the Reference Sub-Committee meeting held on 23 May 2018.
8. **APPOINTMENT OF CO-OPTED GOVERNOR**
The Chairman and the Headmistress to be heard.

For Decision

9. **APPOINTMENT OF SUB-COMMITTEES AND WORKING PARTIES**

Report of the Town Clerk.

For Decision
(Pages 11 - 16)

10. **CASH AVAILABLE AT 31 MARCH 2018 IN THE SCHOOL'S CHARITY: THE CITY OF LONDON SCHOOL FOR GIRLS BURSARY FUND INCORPORATING THE CITY OF LONDON SCHOOL FOR GIRLS SCHOLARSHIPS & PRIZES FUND**

Report of the Chamberlain.

For Decision
(Pages 17 - 18)

11. **HR UPDATE**

Report of the Director of Human Resources.

For Information
(Pages 19 - 46)

12. **REPORT OF THE HEADMISTRESS**

Report of the Headmistress of the City of London School for Girls.

For Decision
(Pages 47 - 56)

a) Annex A - Health & Safety Committee Minutes - 18 April 2018 (Pages 57 - 58)

b) Annex B - Pupil and Parent Data Protection Policy (Pages 59 - 68)

c) Annex C - Privacy Notice (Pages 69 - 78)

13. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

14. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

15. **EXCLUSION OF THE PUBLIC**

MOTION - That under Section 100A (4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

For Decision

Part 2 - Non-Public Agenda

16. **NON-PUBLIC MINUTES**

To agree the non-public minutes of the meeting held on 26 February 2018.

For Decision
(Pages 79 - 86)

17. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Information
(Pages 87 - 88)

18. **SUB-COMMITTEE AND WORKING PARTY MINUTES**

For Information

- a) Reference Sub-Committee - 26 February 2018 (Pages 89 - 92)
To receive the non-public minutes of the Reference Sub-Committee meeting held on 26 February 2018.
- b) Reference Sub-Committee - 23 May 2018 (Pages 93 - 96)
To receive the non-public minutes of the Reference Sub-Committee meeting held on 23 May 2018.
- c) Education Working Party - 8 May 2018 (Pages 97 - 100)
To receive the draft minutes of the Education Working Party meeting held on 8 May 2018.
- d) 125th Anniversary Working Party - 20 February 2018 (Pages 101 - 104)
To receive the draft minutes of the 125th Anniversary Working Party meeting held on 20 February 2018.

19. **STRATEGIC UPDATE**

Report of the Headmistress.

For Decision
(Pages 105 - 120)

20. **REFURBISHMENT PROGRAMME - UPDATE**

Report of the Headmistress.

For Information
(Pages 121 - 122)

21. **ANNUAL SAFEGUARDING REVIEW OF PROCEDURES AND POLICIES**

The Deputy Head (Pastoral) to be heard.

For Information

22. **REPORT OF THE HEADMISTRESS**

Report of the Headmistress.

For Decision
(Pages 123 - 132)

- a) Annex A - Behaviour Management Policy (Pages 133 - 136)
- b) Annex B - Safeguarding Report (Pages 137 - 152)

- c) Annex C - Guatemala Risk Assessment (Pages 153 - 162)
- d) Annex D - Summer School Proposal (Pages 163 - 166)
- e) Annex E - Sabbatical Application (Pages 167 - 168)
- f) Annex F - Joint Understanding between ISC and DfE (Pages 169 - 172)

23. **REPORT ON ACTION TAKEN**

Report of the Town Clerk.

For Information
(Pages 173 - 174)

24. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

25. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

Confidential - Circulated Separately

26. **ATL RECOGNITION AGREEMENT**

Report of the Director of Human Resources.

For Information

27. **TEACHERS' PAY PANEL 2018-19**

Report of the Director of Human Resources.

For Decision

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<p>BOWMAN, Mayor</p>	<p>RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 19th April 2018, doth hereby appoint the following Committee until the first meeting of the Court in April, 2019.</p>
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BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL FOR GIRLS

1. **Constitution**

A Non-Ward Committee consisting of,

- up to two Aldermen nominated by the Court of Aldermen
- up to 12 Commoners elected by the Court of Common Council at least one of whom shall have fewer than five years' service on the Court at the time of their appointment
- the following ex-officio Members:-
 - the Chairman of the Board of Governors of City of London School
 - the Chairman of the Board of Governors of City of London Freemen's School
- up to six co-opted non-City of London Corporation Governors with experience relevant to the Board

The Chairman of the Board shall be elected from the City Corporation Members.

2. **Quorum**

The quorum consists of any five Common Council Governors.

Any decision taken by the Board of Governors shall require the agreement of a majority of Common Council Governors present at the meeting and voting.

3. **Membership (until July 2018)**

ALDERMEN

- 4 William Anthony Bowater Russell
- 1 Peter Lionel Raleigh Hewitt

COMMONERS

- 4 (4) Nicholas Michael Bensted-Smith, J.P.
- 1 (1) Tijs Broeke, *for one year*
- 4 (4) Ann Holmes
- 3 (3) Randall Keith Anderson
- 16 (3) Tom Hoffman, Deputy
- 16 (3) Sylvia Doreen Moys
- 17 (2) Richard David Regan, O.B.E., Deputy
- 28 (2) Sir Michael Snyder
- 4 (1) Emma Edhem
- 9 (1) Clare James, Deputy
- 1 (1) Robert Allen Merrett, Deputy
- 1 (1) Rehana Banu Ameer, *for three years*

together with :-

- Prof. Anna Abulafia
- Dr. Stephanie Ellington
- Soha Gawaly
- Elizabeth Phillips
- Vacancy*
- Vacancy*

together with the ex-officio Members referred to in paragraph 1 above.

4. **Terms of Reference**

To be responsible for:-

- (a) all School matters;
- (b) the management of the School land and buildings belonging to the City of London Corporation;
- (c) the appointment of the Headmaster/Headmistress and, where appropriate, the deputies and the bursar.

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Agenda Item 6

BOARD OF GOVERNORS OF THE CITY OF LONDON SCHOOL FOR GIRLS Monday, 26 February 2018

Minutes of the meeting of the Board of Governors of the City of London School for Girls held at Guildhall on Monday, 26 February 2018 at 11.30 am

Present

Members:

Deputy Clare James (Chairman)	Ann Holmes
Nicholas Bensted-Smith (Deputy Chairman)	Deputy Robert Merrett
Rehana Ameer	Sylvia Moys MBE
Randall Anderson	Elizabeth Phillips (External Member)
Emma Edhem	Deputy Richard Regan
Dr. Stephanie Ellington (External Member)	Mary Robey (External Member)
Soha Gawaly (External Member)	Alderman William Russell
Alderman David Graves	Sir Michael Snyder

In Attendance (Item 10, Appendix 6 Only):

Rebecca Rendle	More Partnership
Jo Purcell	More Partnership

Officers:

Ena Harrop	- Headmistress
Claire Tao	- Deputy Headmistress
Alan Bubbear	- Bursar
Alistair MacLellan	- Town Clerk's Department
Paige Upchurch	- Town Clerk's Department
Steven Reynolds	- Chamberlain's Department

1. APOLOGIES

Apologies for absence were received from Professor Anna Sapir Abulafia, Deputy Tom Hoffman and Deputy Roger Chadwick.

2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

Alderman David Graves noted that, although the issue of expansion was not on the agenda that day, he would withdraw from the room in the event it was discussed under Matters Arising on Item 9 (Non-Public Minutes).

3. MINUTES

RESOLVED – That the minutes of the meeting held on 6 December 2017 be approved as an accurate record subject to amended typographical errors.

4. ANNUAL REVIEW OF TERMS OF REFERENCE

Members considered a report of the Town Clerk.

RESOLVED – that no changes to the existing terms of reference of the Board were necessary.

5. **PUBLIC REPORT OF THE HEADMISTRESS**

Governors considered a public report of the Headmistress. The Headmistress noted that the visit of the Chairman and Elizabeth Phillips to the School on 3 November 2017 should have been included in the report.

RESOLVED – that the report be noted.

6. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no questions.

7. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**

Welcome to New Governors

The Chairman welcomed Soha Gawaly and Rehana Ameer to their respective first meetings of the Board.

Thank You to Mary Robey

The Chairman also expressed her thanks to Mary Robey, who was attending her last meeting as co-opted Governor. The Chairman commended Ms Robey's energy and commitment to the Board during her time as Governor. Ms Robey was heard in reply.

Congratulations to Sylvia Moys MBE

The Chairman congratulated Sylvia Moys for her award of MBE in the New Year Honours List for services to the City of London Corporation and education in Croydon.

Congratulations to Claire Tao

The Chairman expressed her thanks and congratulations to Clare Tao, the Deputy Headmistress of the School, who was leaving the School shortly to take up her first Headship at Merchant Taylors' Girls' School, Crosby.

8. **EXCLUSION OF THE PUBLIC**

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

9. **NON-PUBLIC MINUTES**

RESOLVED, that the non-public minutes of the meeting held on 6 December 2017 be approved as an accurate record, subject to the amendment of typographical errors.

10. **NON-PUBLIC REPORT OF THE HEADMISTRESS**

Governors considered the non-public report of the Headmistress which provided information of non-public matters in relation to the School.

10.1 **Appendix 1 - Complaints Policy**

Governors considered the Complaints Policy.

10.2 **Appendix 2 - Examinations Policy**

Governors considered the Examinations Policy.

10.3 **Appendix 3 - Proposed International Student Exchange Programme to Lauriston School for Girls, Melbourne, Australia**

Governors considered a proposal to enter an exchange partnership with Lauriston School, Melbourne, Australia.

10.4 **Appendix 4 - CLSG Proposed Trip to Belfast and Derry/Londonderry**

Governors considered a proposed History Trip to Northern Ireland.

10.5 **Appendix 5 - 2-Day Northern Ireland Tour Working Itinerary**

Governors noted the working itinerary for the proposed 2-Day History Trip to Northern Ireland.

10.6 **Appendix 6 - More Partnership Summary Report**

Governors received a Presentation from More Partnership regarding their report *Establishing a Sustainable Fundraising Programme – City of London School for Girls Summary Report and Recommendations* and considered the associated report.

10.7 **Appendix 7 - Risk Register**

Governors considered the Risk Register.

10.8 **Appendix 8 - Minutes of the Health and Safety Committee Meeting held on 4 January 2018**

Governors considered the minutes of the Health and Safety Committee Meeting held on 4 January 2018.

11. **MATERNITY, ADOPTION AND SHARED PARENTAL PAY**

Governors considered a report of the Director of Human Resources regarding Maternity, Adoption and Shared Parental Pay.

12. **MANAGEMENT INFORMATION DASHBOARD**

Members received a report of the Chamberlain regarding the Management Information Dashboard.

13. **ACTION TAKEN BETWEEN MEETINGS**

Governors considered a report of the Town Clerk regarding action taken since the last meeting of the Board.

RESOLVED – that the report be noted.

14. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE BOARD**

There were no non-public questions.

15. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE BOARD AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was no other business.

The meeting ended at 1.25 pm

Chairman

Contact Officer: Paige Upchurch / paige.upchurch@cityoflondon.gov.uk

**REFERENCE SUB COMMITTEE OF THE BOARD OF GOVERNORS OF THE
CITY OF LONDON SCHOOL FOR GIRLS
Monday, 26 February 2018**

Minutes of the meeting of the Reference Sub Committee of the Board of Governors of the City of London School for Girls held at Guildhall on Monday, 26 February 2018 at 10.30 am

Present

Governors:

Clare James (Chairman)
Nicholas Benstead-Smith, JP (Deputy Chairman)
Deputy Richard Regan, OBE
All Anderson
Sir Michael Snyder

Officers:

Ena Harrop	-	Headmistress
Alan Bubbear	-	Bursar
Steven Reynolds	-	Chamberlain's Department
Alistair MacLellan	-	Town Clerk's Department
Paige Upchurch	-	Town Clerk's Department

1. APOLOGIES

There were no apologies.

2. GOVERNORS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA

There were no declarations.

3. TERMS OF REFERENCE

RESOLVED – That Governors note the terms of reference.

It was mentioned that the wording of “(have the power to act)” is unclear, as it is the main Board’s duty, rather than the Reference Sub-Committee’s, to make decisions regarding fee increases. The Town Clerk informed the Governors that this has been noted to be reconsidered in June during the annual review of Committee Terms of Reference.

4. MINUTES

RESOLVED – That the minutes of the meeting held on 26 February 2017 be approved as an accurate record.

5. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE

There were no questions

6. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Dates/Times of Meetings
At the request of the Chairman, the Town Clerk agreed to circulate 2018/19 meeting dates to Governors.
7. **EXCLUSION OF THE PUBLIC**
RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the remaining items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act 1972.
8. **NON-PUBLIC MINUTES**
RESOLVED – That the non-public minutes of the meeting held on 26 February 2017 be approved as an accurate record.
9. **ARREARS OF SCHOOL FEES - SPRING 2018**
Governors considered a report of the Bursar for the City of London School for Girls.
10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
There was one non-public question.
11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**
There was no other business.

The meeting ended at 11.15 am

Chairman

Contact Officer: Paige Upchurch / paige.upchurch@cityoflondon.gov.uk

**REFERENCE SUB COMMITTEE OF THE BOARD OF GOVERNORS OF THE
CITY OF LONDON SCHOOL FOR GIRLS
Wednesday, 23 May 2018**

Note of the inquorate meeting of the Reference Sub Committee of the Board of Governors of the City of London School for Girls held at tbc on Wednesday, 23 May 2018 at 10.00 am

Present

Members:

Deputy Clare James (Chairman)
Nicholas Bensted-Smith (Deputy Chairman)

Officers:

Paige Upchurch	- Town Clerk's Department
Steven Reynolds	- Chamberlain's Department
Alan Bubbear	- Bursar

N.B.: Members agreed to continue with the meeting inquorate and noted that they did not have decision making powers. It was agreed that Members would make recommendations in the meeting and these would be put to the Town Clerk for approval under urgent authority.

- 1. APOLOGIES**
Apologies were received from Randall Anderson.
- 2. MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
There were no declarations.
- 3. MINUTES**
The minutes of the meeting held on 6 December 2017 were deferred to a future meeting for approval.
- 4. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**
There were no questions.
- 5. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Dashboard Summary
Governors requested that future reports include a summary table of outstanding debt. This summary should include the number of parents with outstanding debt over 30 days, highlighting those parents who regularly incur debt, and also the total debt.

Recurring Cases

The Chairman commented that the report was unclear as to which parents were also on the report from the previous meeting. The Bursar agreed to consult with the Chairman to change the format of the report to make this clear.

6. **EXCLUSION OF THE PUBLIC**

RESOLVED - That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

7. **MINUTES**

The minutes of the meeting held on 6 December 2017 were deferred to a future meeting for approval.

8. **OUTSTANDING ACTIONS**

Governors received an updated report from the Bursar which included a progress update on the actions arising from the previous meeting.

9. **CITY OF LONDON SCHOOL FOR GIRLS - ARREARS OF SCHOOL FEES - SUMMER 2018**

Governors considered a report of the Bursar regarding arrears of school fees as of Summer 2018.

10. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE SUB COMMITTEE**

There were no questions.

11. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT AND WHICH THE SUB COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

There were no items of urgent business.

The meeting ended at 10.55 am

Chairman

Contact Officer: Paige Upchurch / Paige.Upchurch@cityoflondon.gov.uk

Committee(s) Board of Governors of the City of London School for Girls	Dated: 18 June 2018
Subject: Appointment of Sub-Committees and Working Parties	Public
Report of: Town Clerk	For Decision
Report author: Alistair MacLellan, Town Clerk's Department	

Summary

This report gives Governors the opportunity to review the composition, terms of reference and membership of its Committees and Working Parties and refresh them for the 2018/19 academic year.

Recommendation(s)

That Members,

- Consider and approve the terms of reference of the Committees and Working Parties of the Board;
- Appoint the membership of those Committees and Working Parties for the remainder of the 2018/19 academic year.

Main Report

Background

1. This report considers the appointment, terms of reference and composition of the Board's Bursary Committee, Working Parties and Teachers Pay Panel.

Bursary Committee

2. There are a number of different awards which are provided to pupils at the City Schools, either at entry to the Schools or once the pupil is established. The Bursary Committee is concerned with applications for 'Hardship Bursaries' to pupils where the parents fall into financial hardship and are unable to pay the school fees or where a pupil is unable to take up a place at the respective School because of financial hardship. These awards are funded from the charitable trust funds for the school and any awards made are reviewed on an annual basis (after three term's assistance).
3. **The Board is asked to appoint up to five Governors to the Bursary Committee.**

Reference Sub-Committee

4. The purpose of the Reference Sub-Committee is to consider arrears of school fees, sabbatical leave and estimates (including fee increases) (with power to

act) and other such matters as the Board may from time to time decide for the year ensuing.

- 5. The Board is asked to appoint up to five Governors to the Reference-Sub Committee.**

125th Anniversary Working Party

6. This Working Party of the Board is responsible for overseeing arrangements for the celebration of the City of London School for Girls' 12th anniversary in 2019.
- 7. The Board is asked to appoint up to three Governors to the 125th Anniversary Working Party and appoint its Chairman.**

Education Working Party

8. This Working Party of the Board is responsible for overseeing all matters pertaining to academic performance at the School, including safeguarding, school trips, Special Educational Needs, International links, Admissions, Staffing and Compliance.
- 9. The Board is asked to appoint up to seven Governors to the Education Working Party and appoint its Chairman.**

Teachers' Pay Panel

10. In February 2015 the Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freemen's School delegated to a Teachers' Pay Panel, consisting of the Chairmen of their Boards, the authority to consult and decide upon the annual teachers' pay award within agreed parameters from the Boards.
11. Governors are asked to note the composition, purpose and schedule of the Teachers' Pay Panel set out in the appendix.

Appendices

- Appendix – Composition, Terms of Reference and Current Memberships of Committees and Working Parties.

Alistair MacLellan

Town Clerk's Department

alistair.maclellan@cityoflondon.gov.uk

Bursary Committee

Composition

- Chairman and Deputy Chairman of the Board of Governors of the City of London School for Girls
- Up to five other Governors appointed by the Board of Governors.

The quorum shall be any three Governors.

Terms of Reference

The Bursary Committee at their sole discretion after considering recommendations by the Head of the School have power by a simple majority of those present and voting at a meeting of the Bursary Committee to apply the Fund for the advancement of public education by the following purposes: -

- (i) contributing towards the fees payable to the School on behalf of suitably qualified pupils who but for financial assistance having commenced education at the School would not be able to continue their education at the School;
- (ii) contributing towards the fees payable to the School on behalf of pupils of academic merit who but for financial assistance would not be able to obtain suitable education at the School;
- (iii) such other charitable purposes as shall be associated with the School as the Bursary Committee shall direct.

PROVIDED ALWAYS that no such bursary shall be made in respect of a pupil who is the issue of a parent of a member of the Board or of the spouse of such a member.

2017/18 Membership

- Clare James (Chairman)
- Nick Bensted-Smith (Deputy Chairman)
- Randall Anderson
- Deputy Richard Regan
- Richard Sermon [**no longer on the Board as at December 2017**]

Reference Sub-Committee

Composition

- Chairman and Deputy Chairman of the Board of Governors of the City of London School for Girls
- Up to five other Governors appointed by the Board of Governors

The quorum shall be any three Governors.

Terms of Reference

To consider arrears of school fees, sabbatical leave and estimates (with power to act) and other such matters as the Board may from time to time decide for the year ensuing.

2017/18 Membership

- Clare James (Chairman)
- Nick Bensted-Smith (Deputy Chairman)
- Tom Hoffman

125th Anniversary Working Party

Composition

- Three Governors
- Headmistress
- Up to two representatives of the Friends of the City of London School for Girls
- Up to two representatives of the City of London Old Girls' Association

Terms of Reference

To oversee arrangements for the celebration of the City of London School for Girls' 125th anniversary in 2019.

2017/18 Membership

- Alderman William Russell (Chairman)
- Deputy Clare James
- Ann Holmes
- Ena Harrop

Education Working Party

Composition

- Seven Governors
- Headmistress
- Deputy Heads

Terms of Reference

To oversee all matters pertaining to academic performance at the School, including safeguarding, school trips, Special Educational Needs, International links, Admissions, Staffing and Compliance.

2017/18 Membership

- Mary Robey (Chairman)
- Professor John Betteridge
- Dr Stephanie K L Ellington
- Ann Holmes
- Deputy Clare James
- Elizabeth Phillips
- Alderman William Russell
- Ena Harrop (Headmistress)
- Neil Codd (Deputy Head, Academic)
- Katie Brice (Deputy Head, Pastoral)
- Claire Tao (Deputy Head, Staff)

Teachers Pay Panel

Purpose of the Teachers' Pay Panel

- The Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freeman's School have delegated to a Teachers' Pay Panel, consisting of the Chairmen of their Boards, the authority to consult and decide upon the annual teachers' pay award within agreed parameters from the Boards.
- The Teachers' Pay Panel will consult with the Schools' Staff Side or Common Room representatives and an official from the Association of Teachers and Lecturers regarding the Teachers' pay submission.
- The Teachers' Pay Panel will usually meet in March of each year. The Panel may decide to hold further meetings or conduct further communications via letter if necessary. However the aim will be to have made any decisions regarding pay by the end of the Spring term.

Membership:

The Chairmen of the Boards of Governors of the City of London School, the City of London School for Girls and the City of London Freeman's School. In their absence they may nominate a deputy from the membership of their Board of Governors.

One of the Chairmen of the Boards of Governors will act as the Chairman of the Teachers' Pay Panel on an annual rotation.

Quorum:

The Quorum will be three and will consist of a Governor from each of the three Boards.

Consultation Process:

During the process of deliberation, the Teachers' Pay Panel will meet with:

One representative from the Staff Side or Common Room of the City of London School, the City of London School for Girls and the City of London Freeman's School; and

The full time official from the Association of Teachers and Lecturers.

The following will be in attendance during deliberations in an advisory capacity:

- The Director of Human Resources
- The Heads of the City of London School, the City of London School for Girls and the City of London Freeman's School or in their absence their Deputy.

Remit of the Teachers' Pay Panel:

To approve any pay award that will apply to the teachers' main grade and all teachers' management grades.

Any decisions around responsibility and other allowances or payments will be specified.

Timing

The timing of the process will be as follows:-

Financial information will be provided by the schools to the Staff Side and Common Room representatives in the autumn term of each year.

Any pay submission made by the Staff Side and Common Room will be made to a meeting of the Joint Consultative Committee in January/early February of each year.

Teachers' Pay Panel will usually meet in March.

Final decision to be made by the end of the Spring term if at all possible.

Termination

The Boards of Governors will review on an annual basis the continuation of the Teachers' Pay Panel.

Committee	Date:	Item no.
Board of Governors of the City of London School for Girls	Monday, 18 June 2018	
Subject: Cash available at 31 March 2018 in the school's charity: <i>The City of London School for Girls Bursary Fund incorporating The City of London School for Girls Scholarships & Prizes Fund</i>		Public
Report of: The Chamberlain		For Decision
Report author: Steven Reynolds, Chamberlain's Department		
<u>Is the cash available to the school's bursary and prizes charity sufficient?</u>		
<ol style="list-style-type: none"> 1. This report notifies Governors that the available cash balance at 31 March 2018 in its charity The City of London School for Girls Bursary Fund incorporating The City of London School for Girls Scholarships & Prizes Fund was £281,885. The report considers whether this is a sufficient 'working cash balance' to ensure that the charity is not overdrawn during the coming year, which would incur interest charges. 2. As income in any year tends to lag behind expenditure, without an appropriate 'working cash balance' the fund would be overdrawn for much of the year and incur interest charges. Cashflow has been analysed over the last 3 years which has revealed that a 'working cash balance' of £293,694 is required to avoid the fund being overdrawn. 3. The Bursar has confirmed that expenditure and income in the coming year is anticipated to be similar to last year and, therefore, a 'working cash balance' of £293,694 should continue to be sufficient to avoid being overdrawn. 4. Given that the level of available cash of £281,885 as at 31 March 2018 was less than the required 'working cash balance' of £293,694, a dis-investment of funds invested in Charities Pool units of £11,809 is recommended at this time. 5. The next review of the available 'working cash balance' will be presented to this Board in June 2019, in time to meet the 1 October deadline for investment or dis-investment in the Pool, should this be required. 		
Recommendations		
<ul style="list-style-type: none"> • It is recommended that Governors endorse that a dis-investment of Charities Pool units amounting to £11,809 is actioned on 1 October 2018. 		

Contact:

Steven Reynolds, Group Accountant

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Committee(s)	Dated:
City of London Freeman’s School Board of Governors City of London School Board of Governors City of London School for Girls Board of Governors	6 June 2018 14 June 2018 18 June 2018
Subject: HR Update - Gender Pay Gap Data Protection Policy Employees People Security Policy	Public
Report of: Director of Human Resources	For Information
Report author: Tracey Jansen – HR, Town Clerks	

Summary

This report outlines for the Boards of Governors the City of London Corporation’s Gender Pay Gap which includes all teaching and non-teaching staff in the three city schools.

It also advises Members of the revised Data Protection Policy for employees including teaching staff and has been adopted to ensure that the City Corporation is compliant with the General Data Protection Regulations (GDPR).

The City Corporation has also adopted an overarching Security Policy for employees, other workers, contractors and others working under contracts for services which is fundamental to embedding a security culture. Local security arrangements that exist in the schools will continue to apply but may need to be reviewed in light of the new Policy.

Recommendation

Members are asked to note the report.

Main Report

Background

Gender Pay Gap

1. With effect from 6 April 2017 all relevant employers were required to publish their gender pay gap data, the deadline for the first reports was 30 March 2018 for public sector employers and 4 April 2018 for the private / voluntary sector.
2. It is important not to confuse the gender pay gap with equal pay. The gender pay gap measures the differences between the average pay of male and female employees, irrespective of job role or seniority. Whereas equal pay concerns

pay differences between male and female employees performing the same or similar work, or work of equal value.

General Data Protection Regulations

3. Members will be aware that the EU has introduced updated and harmonised data protection regulations known as the General Data Protection Regulation, which came into force on 25 May 2018. This has had a wide sweeping impact across all of our work. The Corporate Data Protection Policy (separate from the Employee Data Protection Policy) was approved by the Establishment Committee in April 2018.

People Security Policy

4. There has been a senior officer level Security Board chaired by the Town Clerk looking at the full range of security matters that impact on the City Corporation. The People Security Board was set up this year to consider all people focussed aspects in relation to security and it has developed a full action plan of activities covering employees, other workers, Members, contractors and visitors. The aim is to create and embed a security culture.
5. The focus, particularly with the recent commonwealth events has been on the Guildhall complex but the plan is to extend its work across the entire City Corporation estate including the schools.

Current Position

Gender Pay Gap

6. The City Corporation had reported on all of its workforce which includes the teaching and non-teaching staff in the three city schools in accordance with the requirements.
7. Table 1 below reports the City Corporation's gender pay gap i.e. the pay discrepancy between men and women irrespective of their job or position. The 2016/17 workforce profile indicates that 55.21% of our workforce is male and 44.79% is female.

Table 1: The Corporation’s gender pay gap (“snap shot” date of 31 March 2017)

Pay rates	Gender pay gap - the difference between women’s pay and men’s pay as a percentage of men’s pay		
Mean hourly rate	8.1% Lower		
Median hourly rate	1.4% Lower		
Pay quartiles	Women	Men	Total
Proportion of women and men in the upper quartile (paid above the 75th percentile point)	43%	57%	100%
Proportion of women and men in the upper middle quartile (paid above the median and at or below the 75th percentile point)	51%	49%	100%
Proportion of women and men in the lower middle quartile (paid above the 25th percentile point and at or below the median)	47%	53%	100%
Proportion of women and men in the lower quartile (paid below the 25th percentile point)	46%	54%	100%
Bonus pay	Bonus Gender Pay Gap - the difference women's bonus and men's bonus as a % of men's bonus		
Mean bonus	14% Lower		
Median bonus	0%		
Bonuses paid	Women	Men	
Who received bonus pay	11%	13%	

8. For the proportion of males and females in each quartile pay band, the figures in table 1 show the proportions of male and female full-pay relevant employees in four quartile pay bands, which is calculated by dividing the workforce into four equal parts. These quartile pay bands are established when making the calculation, so they do not correlate to the Corporation’s own pay banding, but as an indicator they equate to:

- Lower Quartile Range: up to £13.73 per hour
- Lower Middle Quartile Range: £13.80 to £18.71 per hour
- Upper Middle Quartile Range: £18.85 to £28.34 per hour
- Upper Quartile Range: £28.40 to £141.96 per hour

9. The data helps us to develop our HR Strategy and in particular the equality and inclusion action plan and HR policy and procedure development.

10. The gender pay gap calculations are based on the total monetary pay bill and as there are more men employed in the City Corporation particularly at the most senior grades, this impacts on the mean percentage pay and bonus calculation.

Data Protection Policy

11. We are currently reviewing HR policies and procedures to ensure compliance with the requirements of GDPR. The Employee Data Protection Policy was agreed at the Establishment Committee at its meeting in May 2018. It provides employees with a framework that outlines appropriate use of personal data in accordance with the GDPR, whilst protecting the City Corporation against liability for the actions of its employees, other workers, former employees and former other workers.
12. Appended within the revised Policy is the Employee Privacy Notice, this describes how the City Corporation as a Data Controller collects and uses personal information about employees during and after their employment. These have been sent to all members of staff. Amended contract clauses to comply with the GDPR have also been made along with a privacy notice for job applicants. In addition, all staff have been required to complete mandatory data protection eLearning.
13. The Director of HR has been granted delegated powers to approve necessary amendments to HR policies and procedures to ensure their compliance with the new legislation. Such amendments will be subject to appropriate trade union consultation.

People Security Policy

14. The People Security Board has developed and consulted on a Security Policy in relation to employees and other workers, contractors and others working under contracts for services. The Policy which was agreed at the Establishment Committee at its meeting in May 2018 clarifies the standards and expectation of all employees in relation to all matters of Security. The intention is to link to guidance and related policies and procedures as they are developed.
15. The Board considers security to be of the utmost importance. As with all conduct matters there is an incremental approach from informal standard setting, then if necessary progression through the formal stages if the required standard is not met. Any serious breaches of conduct can be considered as gross misconduct. The Establishment Committee at its meeting in May agreed to add serious breaches of security as an example of gross misconduct in the disciplinary procedures to re-enforce the importance placed on security.
16. Regular communication and messaging ensures that staff members, other workers and Members understand the types of security threat that exists and to ensure that they remain vigilant at all times.

Proposals

17. Gender Pay Gap Regulations require us to report on the total workforce. Whilst we could report on schools only it is thought that the pay gap will be more balanced than the all staff reported figure. The plan is to report on the disability and ethnicity pay gaps during the course of the year.

18. Further work is continuing to update our HR policies and procedures for GDPR compliance and as appropriate these will be reflected in the Teachers Guide. These amendments have been delegated to the Director of HR to approve and it is not proposed that these are report back to the Board for information unless there is a particular issue that the Board needs to be sighted on.
19. The establishment of a Security Policy and by making specific reference to serious breaches of security as potential gross misconduct are fundamental steps to embed a security culture.

Implications

20. There is a requirement to report our Gender Pay Gap and to be compliant with GDPR. The City Corporation recognises the range of security threats that present challenges for us and the need for these to be addressed.

Conclusion

21. We have complied with the Gender Pay Gap reporting requirements. The data capture informs the HR strategy and allows us to compare ourselves with other organisations.
22. As an employer the City Corporation must ensure it is able to demonstrate compliance with the new GDPR legislation this includes making sure our policies, procedures and contractual terms are revised accordingly.
23. Having a Security Policy that sets out the standards and expectations is an important element of embedding a security culture. Further activities will be rolled out over the coming year.

Appendices

- Appendix 1 – Employee Data Protection Policy and Employee Privacy Notice
- Appendix 2 - Security Policy - People

Background Papers

Gender Pay Gap - Report to Establishment Committee February 2018
Equalities Update - Report to Establishment Committee April 2018
Data Protection - Report to Establishment Committee May 2018
People Security Policy - Report to Establishment Committee May 2018

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Employee Privacy Notice

This notice describes how the City of London Corporation (“the City Corporation”) as a data controller collects and uses personal information about you during and after your employment, in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018). The Notice will be reviewed periodically and may be updated at any time.

This Notice applies to current and former employees, workers and contractors. The City Corporation’s Data Protection Officer is the Comptroller and City Solicitor and can be contacted at information.officer@cityoflondon.gov.uk.

The information we hold about you

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

There are "special categories" of more sensitive personal data which require a higher level of protection.

Examples of the categories of personal information we will collect, store and use about you include:

- Personal contact details such as name, title, address, telephone numbers and personal email addresses
- Date of birth
- Gender
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll number and tax status information

- Information such as salary, start date, annual leave, working hours, work title, job roles, pensions and benefits information
- Location of employment or workplace
- Copy of driving licence (if required)
- Recruitment information (including copies of right to work documentation, references, documents verifying identity/qualifications and other information included in an application form, CV or covering letter or as part of the application process)
- Performance information
- Disciplinary and grievance information
- Information obtained through electronic means such as ID card
- Information about your use of our information and communications systems
- Photographs

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious/philosophical beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your health, including any medical condition, health and sickness records, and disability
- Genetic information and biometric data
- Information about criminal convictions and offences, or related security measures such as, for specific roles Disclosure and Barring Service (DBS) checks, the Single Central Register (SCR) in schools) work absence information such as number of absences and reasons
- Data for monitoring and reporting purposes such as equalities data reporting to demonstrate compliance with The Public Sector Equality Duty (PSED). Reporting will be of anonymised data only

Why we collect and use this information

- To make a decision about your recruitment and confirm your suitability for employment
- To determine the terms on which you work for us
- To check you are legally entitled to work in the UK
- To pay you and, if you are an employee, deducting tax and National Insurance contributions

- To administer employees' pension benefits
- To administer the contract we have entered into with you
- To make decisions about salary reviews, compensation and continued employment
- To conduct performance reviews, manage performance, manage sickness absence and fitness to work
- To make arrangements for the termination of the employment relationship
- To enable the development of a comprehensive picture of the workforce and how it is deployed
- To inform the development of recruitment and retention policies
- To comply with health and safety obligations

The lawful basis on which we process this information

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

1. To perform the contract we have entered into with you.
2. Where we need to comply with a legal obligation.
3. Where it is necessary in the public interest.
4. Where point 3 does not apply, where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
5. Where we need to protect your interests (or someone else's interests).
6. In limited circumstances, with your explicit written consent.

The legal basis for collecting special categories of data, include the following circumstances:

1. In limited circumstances, with your explicit written consent.
2. Where we need to carry out our legal obligations and in line with our data protection policy.
3. Where it is needed in the public interest, such as for equal opportunities monitoring or in relation to our occupational pension scheme, and in line with our data protection policy.
4. Where it is needed to assess your working capacity on health grounds, subject to appropriate confidentiality safeguards.

Less commonly, we may process this type of information where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the information public.

Consent

If we have consent to use your personal information for any particular reason, you have the right to remove your consent at any time by contacting the Information Compliance Team.

Collecting this information

Whilst the majority of information you provide is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. Staff receive mandatory training in data protection.

Storing this information

We hold your personal data for a reasonable period in accordance with legal requirements after the termination of your employment with us.

Sharing this information

We share information about employees with external agencies only when necessary and where the law and our policies permit us to do so, for example for the prevention or detection of crime.

We may share your personal data with the trade unions and organisations which provide and administer employee benefits. For example, auto-enrolment under the Pensions Act 2008 to either the Local Government Pension Scheme (LGPS) for officers or the Teachers' Pension Scheme (TPS) for teachers.

Where a third party is to process personal data on our behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data. However, where you may choose to elect to enter into an agreement directly with an external staff benefits provider, then that provider's own privacy notice should be referred to.

International data transfers

Employee related personal data held directly by the City Corporation is not routinely transferred to countries outside the EEA. However, certain data processed by third parties on behalf of the City Corporation may be transferred, for instance organisations based outside the EEA or operating on a global basis may need to transfer or store your data outside the EEA. We will put in place additional protections on your personal information if it leaves the UK ranging from secure way of transferring data to ensuring we have a robust contract in place with that third party. Links to each organisation's privacy notice will also be supplied where this occurs.

Your rights regarding your personal information

Under data protection legislation, you have the right to request access to information about you that we hold, also known as a Subject Access Request. You will not have to pay a fee to access your personal information (or to exercise any of the other rights listed below). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

You also have the right to:

- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your

particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.

- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

To make a Subject Access Request or to verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Information Compliance Team at information.officer@cityoflondon.gov.uk who will refer your request to the relevant departmental AIN representatives. Refer to the Data Subject Rights' Policy for further information.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance, these should be addressed to: Information Compliance Team, Comptroller and City Solicitor's Department, City of London, PO Box 270, Guildhall, London, EC2P 2EJ, UK; or email information.officer@cityoflondon.gov.uk.

Further information

If you would like to discuss anything in this Privacy Notice, please contact the City Corporation's Data Protection Officer at information.officer@cityoflondon.gov.uk.

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

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number.

Alternatively, visit ico.org.uk or email casework@ico.org.uk.

Data Protection Policy (Employees)

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Statement of Intent

1. The City of London Corporation (City Corporation) is committed to all aspects of data protection and takes seriously its duties, and the duties of its employees, under the General Data Protection Regulation 2016 (GDPR) and the Data Protection Act 2018 (DPA 2018). This policy sets out how the City Corporation deals with employees' personal data, including personnel files and data subject access requests; and employees' obligations in relation to personal data.
2. The City Corporation recognises that employees have rights in relation to their own personal data processed by the City Corporation, and as employees of the City Corporation they have responsibilities for the personal data of others (i.e. clients, customers and colleagues) which they process in the course of their work.
3. The City Corporation has appointed the Comptroller & City Solicitor as Data Protection Officer, the person with responsibility for advising the organisation in relation to data protection compliance, who can be contacted at information.officer@cityoflondon.gov.uk.
4. The Director of Human Resources will be responsible for the interpretation, advice and management of this procedure on behalf of the City Corporation.

Scope

5. This policy applies to all prospective, current and former employees and workers at the City Corporation, including teaching and support staff in the three City Schools and support staff in the City of London Police. The term 'employee' used in this policy refers to all those in scope as described above. In addition other workers such as, contractors, agency workers, volunteers, interns, apprentices and those undertaking work experience at the City Corporation are expected to observe the data protection principles and to comply with the responsibilities set out in the paragraphs below.
6. This policy should be read in conjunction with the corporate Data Protection Policy and may be supplemented by local data protection policies for example within Schools and the Barbican Centre where local policies may act as an extension to this policy.

Purpose

7. The purpose of the policy is to:
 - provide employees with a framework that outlines appropriate use of personal data in accordance with the GDPR and DPA 2018; and
 - protect the City Corporation against liability for the actions of its employees, other workers, former employees and former other workers.

Definitions

8. Data protection is about the privacy of individuals, and is governed by the GDPR and DPA which defines, among others, terms as follows:

- **“Personal data”** any information that relates to an identified or identifiable living individual. This includes where living individuals can be directly or indirectly identified using information such as a name as well as other identifiers such as unique personal identifiers (e.g. payroll and National Insurance numbers), location data or other online identifiers, as well as physical, physiological, genetic mental, economic, cultural or social identity
- **“Controller”** the person or organisation responsible for determining the purposes and means of the processing of personal data The City Corporation is the data controller in respect of all personal information that relates to the City Corporation’s business.
- **“Data Protection Officer” (DPO)** public authorities are required to have a DPO to inform and advise on data protection matters, monitor compliance with data protection legislation and act as liaison with the Information Commissioner’s Office (ICO).
- **“Data subject”** is the identified or identifiable person to whom the personal data relates.
- **“Processing”** is defined very broadly and encompasses any action performed on or with personal data, including collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction (that is, the marking of stored data with the aim of limiting its processing in the future, erasure and destruction. In effect, it is any activity involving personal data.
- **“Processor”** is the person or organisation (a third party) who processes personal data on behalf of the data controller.
- **“Special categories of personal data”** means personal data which reveals a data subject’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric and health data, and information relating to a data subject’s sex life or sexual orientation.
- **“Criminal records data”** means information about an individual's criminal convictions and offences, and information relating to criminal allegations and proceedings. To note it is lawful to consider spent convictions for certain types of employment listed as detailed in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975.

Data Protection Principles

9. The City Corporation is legally required to comply with the six Data Protection principles when processing personal data. These principles require that personal data:
 - i. Shall be processed lawfully, fairly and in a transparent manner in relation to the data subject.
 - ii. Shall be collected only for specified, explicit and legitimate purposes; and it must not then be further processed in any manner incompatible with those purposes.
 - iii. Shall be adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed.
 - iv. Shall be accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay.
 - v. Shall not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subjects.
 - vi. Shall be processed in a manner that ensures its appropriate security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.
10. The City Corporation tells individuals the reasons for processing their personal data, how it uses such data and the legal basis for processing in its privacy notices. It will not process personal data of individuals for other incompatible reasons.
11. Stronger legal protection applies in relation to the special categories of personal data information:
 - racial or ethnic origin
 - political opinions
 - religious or philosophical beliefs
 - the processing of genetic data
 - the processing of biometric data in order to uniquely identify a person
 - mental or physical health
 - sexual life and orientation
 - trade union membership
12. There are separate safeguards for personal data relating to criminal convictions and offences, or related security measures.

The City Corporation

13. As a data controller the City Corporation has publicly registered its general purposes for processing personal data on the Information Commissioner's Office (ICO) website.
14. As part of the purpose of "employee administration" the City Corporation may, where necessary for a lawful purpose, disclose personal data to professional advisers (e.g. legal or medical), pension scheme administrators including the LGPS Pensions Board, banks and insurers, and other companies to which the City Corporation has contracted work relating to any of the purposes stated on its register of processing activities.
15. 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. Information about employees may also be disclosed to others at the employee's request or with the employee's consent.
16. Special provisions apply to the processing of special categories of personal data (see definitions), and generally the processing of such information will be avoided where possible. Where the City Corporation needs to process special categories of personal data it will rely on the subject's explicit consent given in the contract of employment, or on one of the other justifications specified under the first principle i.e. processed lawfully, fairly and in a transparent manner in relation to individuals; or it will seek if appropriate, the data subject's specific consent. The exceptions to individual consent being when collating statistical data for reporting purposes for the City Corporation to fulfil its contractual, management and legal responsibilities.
17. Departments and institutions are responsible for the personal data they hold and process. Accordingly, the City Corporation operates an Access to Information Network (AIN), consisting of representatives from each department which supports this responsibility and the work of the Information Officer. For a list of all departmental AIN representatives at the City Corporation see Links / Other Resources.
18. The departmental AIN representative should be the first port of call, when a matter concerning data protection compliance has arisen. If you are unable to contact your departmental AIN representative, you should contact the Information Compliance Team in the Comptroller and City Solicitor's Department.

Managers

19. Managers should ensure that:
 - They and their employees have completed the mandatory data protection online training course and any further training as appropriate to their role; and

- They and their employees are familiar with local procedures and practices regarding the processing of all personal data to which they have access in the course of their duties.

CityPeople (HR and payroll system)

20. Where personal data held within the CityPeople system is to be disposed of, it is either deleted or redacted and put beyond business use i.e. no unique identification factors remain.

Employees

21. The City Corporation's Employee Privacy Notice (Appendix 1) sets out how personal data may be processed and the legal basis for doing so. In limited circumstances, the City Corporation may rely on employees' explicit consent for processing; where this is the case consent should be freely given, can be withdrawn and will generally be recorded by the employee's signed agreement.
22. As part of the on-going move to employee self-service, managers can view their immediate reports contact information including emergency contact details (where provided) and employment information integral to staff management. However, employees are responsible for maintaining their own personal information (i.e. bank details, home address etc.) whether through City People employee self-service or any other employee self-service system where applicable. Advice or support in doing so is available from the HR Business Unit at CorporateHRHelpdesk@cityoflondon.gov.uk.
23. Employees with access to and responsibility for personal data are expected to:
 - access only data that they have authority to access and only for authorised purposes;
 - comply at all times with the City Corporation's IT, Security and email use policies; and in particular not use a non-corporation email system for the transmission of personal data;
 - use data responsibly and in accordance with the data protection principles and should be cautious about disclosing personal data both within and outside the City Corporation, and about using it in email and via the internet or intranet;
 - complete mandatory data protection and related training to comply fully with corporate and local guidance, procedures and practice regarding the processing of personal data and check their authority to take any action involving personal data with their manager;
 - report any loss or compromise of their own or others personal information to the departmental AIN representative or the Information Compliance Team as soon as possible;

- take all necessary action to keep personal data secure, no matter its form or format, including by the proper management of electronic devices, including mobile devices and computer access; implementing and complying with rules on access to premises and secure electronic and hard copy file storage and destruction, and in accordance with corporate policies and guidance.
24. Where personal information is to be disposed of, employees should ensure that it is destroyed permanently and securely. This may involve the permanent removal of the information from the server so that it does not remain in an employee's inbox, deleted items folder or recover deleted items folder. Hard copies of personal information must be confidentially shredded or placed in confidential waste bins provided. Employees should be careful to ensure that personal information is not disposed of in a wastepaper basket / recycle bin. It must be remembered that the destruction of personal data is of itself “processing” and must be carried out in accordance with the data protection principles.
 25. If an employee acquires any personal data in error by whatever means, they shall inform their departmental AIN representative immediately and, if it is not necessary for them to retain it, destroy the personal data without any further processing of it.
 26. An employee must not send other people’s personal data from a City Corporation laptop, desktop, tablet or mobile phone to a personal email account i.e. an account not owned or controlled by the City Corporation, except where it is legally permitted to do so.
 27. Where employee personal data needs to be taken off site the responsible employee must ensure that appropriate steps are taken to protect it; be it in hard copy, stored on a laptop or other electronic device. For the removal of hard copy information, prior consent should be obtained from their line manager or senior officer. Care must also be taken when observing personal data in hard copy or on-screen so that such information is not viewed by anyone who is not legitimately privy to it.
 28. If an employee is in any doubt about what they may or may not do with personal data, they should seek advice from their departmental AIN representative before taking any action.

Accessing Personal Data / Subject Access Requests (SARs)

29. Data subjects have a general right of access (subject to exemptions) to the personal data held about them. This right can be exercised by submitting a Subject Access Request (SAR). The type of personal data kept about employees includes personnel files, occupational health and sickness records, disciplinary or training records, appraisal or performance review notes, emails in which the employee is the focus of the email and documents that are about the employee.

30. Any employee receiving a SAR from a data subject directly should immediately pass it to their departmental AIN representative and the Information Compliance Team. All responses to SARs should be coordinated by the relevant departmental AIN representative or the Information Compliance Team.
31. Some personal data may be exempt from disclosure to the data subject, but these exemptions or restrictions, are to be assessed on a case by case basis. If a subject access request is manifestly unfounded or excessive, the City Corporation is not obliged to comply with it but can agree to respond where costs are agreed to be met.
32. All SARs must be acknowledged. The City Corporation must respond to a SAR, subject to any exemptions or constraints to disclosure, within one month from the date it is received. In some cases, such as where we process large amounts of the individual's data, we may respond within three months of the date the request is received. The departmental AIN representative will write to the individual within one month of receiving the original request to tell him/her if this is the case.
33. If an employee becomes aware that the City Corporation holds any inaccurate, irrelevant or out-of-date personal information about them, it may be possible for them to update these records themselves (through any corporate employee self-service system). Where this is not possible, they should notify the HR Business Unit at CorporateHRHelpdesk@cityoflondon.gov.uk and provide any necessary or suggested corrections and/or updates to the information. The departmental AIN representative will also be notified.
34. If an employee requests the City Corporation to stop processing data or erase data that is no longer necessary for the purposes of processing on either a temporary or an indefinite basis, they should notify the HR Business Unit at CorporateHRHelpdesk@cityoflondon.gov.uk stating the ground(s) for the request. The departmental AIN Representative will also be notified.
35. However, where the deletion of personal data is approved, and the data is processed by another organisation commissioned on the behalf of the City Corporation, the City Corporation will contact the organisation and inform them of the deletion; unless this proves impossible or involves disproportionate effort. Note: this does not apply in the case of taking up certain staff benefits, where an employee elects to enter into an agreement directly with an external benefits provider, then that provider's own privacy notice should be referred to.
36. In some circumstances it may not be possible to comply with a request for erasure of personal data or to stop processing data. Examples include where processing is required in order to comply with a legal obligation for the performance of a public interest task or exercise of official authority.
37. Complaints regarding the City Corporation's processing of personal data should be addressed to: Complaints Officer, Town Clerk's Department, City of London, PO Box 270, Guildhall, London, EC2P 2EJ, UK; or email: complaints@cityoflondon.gov.uk.

Data Protection Breaches

38. Failure to observe the data protection principles within this policy may result in an employee incurring personal criminal liability. It may also result in disciplinary action up to and including dismissal where there are significant or deliberate breaches of this policy, such as accessing employee or customer personal data without authorisation or a legitimate reason to do so.
39. Employees must immediately report to their departmental AIN representative and the Information Compliance Team, any actual or suspected data protection breaches, which will be investigated in accordance with the City Corporation's Data Protection Breach guidelines.
40. If the City Corporation discovers that there has been a breach of employee related personal data that poses a risk to the rights and freedoms of individuals, it is required to report it to the Information Commissioner within 72 hours of discovery. The City Corporation will record all data breaches regardless of their effect.
41. If the breach is likely to result in a high risk to the rights and freedoms of individuals, it will tell affected individuals that there has been a breach and provide them with information about its likely consequences and the mitigation measures it has taken.
42. Where the City Corporation engages third parties to process personal data on its behalf, such parties do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

Privacy Impact Assessment (PIA)

43. Some of the processing that the City Corporation carries out may result in risks to privacy. Where processing would result in a high risk to individual's rights and freedoms, the City Corporation will need to carry out a data protection Privacy Impact Assessment (PIA) to determine the necessity and proportionality of the processing. This will include considering the purposes for which the activity is carried out, the risks for individuals and the use of new technologies and the measures that can be put in place to mitigate the risks. Advice should be sought from the Data Protection Officer at an early stage where a proposal may require a PIA.

International Data Transfers

44. Employee related personal data held directly by the City Corporation is not routinely transferred to countries outside the EEA. However, certain data processed by third parties on behalf of the City Corporation may be transferred, for instance organisations based outside the EEA or operating on a global basis may need to transfer or store your personal data outside the EEA. Links to each organisation's privacy notice will be supplied where this occurs.

Monitoring

45. Since the City Corporation's communications facilities i.e. email, messaging, Skype etc. are provided for the purposes of the City Corporation's business, employees should not expect that their communications will be private; although the City Corporation will, subject to its overriding business requirements, do its best to respect an employee's privacy and autonomy at work.
46. The City Corporation may monitor an employee's internal and external communications (whether via telephone, email, and internet, or otherwise) for the purposes specified in the Code of Conduct in accordance with the Communications and Information Systems Use Policy.

Training & Compliance

47. The City Corporation provides training to all employees on data protection matters on induction and on a regular basis thereafter. This training is mandatory, and completion of the training will be monitored by Corporate HR and Business Services Unit.
48. The City Corporation will review and ensure compliance with this policy at regular intervals.

List of Appendices

Appendix 1 – Employee Privacy Notice

Links / Other Resources

- [Code of Conduct](#)
- [Communications and Information Systems Use Policy](#)
- [Data Protection Policy](#)
- [Information Commissioner's Office \(ICO\)](#)
- [Departmental AIN representatives](#)

Security Policy - People

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Statement of intent

1. The City of London Corporation prioritises the security and protection of its employees, other workers, Members, assets, Intellectual Property, Personal Data and Confidential Information. Security awareness is everyone’s responsibility, and everyone must comply with the City Corporation security policies and instructions.
2. This policy includes the terms of any security agreements that the City Corporation enters into with customers, government, partner agencies, specific individual requirements and responsibilities within vetted posts and for specific events.
3. This policy is supported by subordinate corporate security procedures and guidance and should be read and operated in conjunction with other relevant City Corporation guidance and advice set out in Link/Other resource.

Scope

4. This policy applies to all City Corporation employees including teaching staff in the three City schools. It also applies to other workers including agency, casual staff, work experience, interns, volunteers, consultants, contractors and those working under a contract for services to the City Corporation.
5. The Director of Human Resources will be responsible for the interpretation, advice and management of these procedures on behalf of the City Corporation. This policy defines the minimum standards which must be followed.

Aims

6. This policy provides a clear statement and an overarching framework for all people security related policies, procedures and guidance.
7. It sets out the City Corporation's security standards and defines the behaviours which must be adhered to in order to protect employees, other workers, visitors, contractors, assets and reputation.

Definitions

8. The following definitions and common terms are:
 - **Assets:** include Intellectual Property, Personal Data and Confidential Information
 - **Personal Data:** is information relating to a living identifiable individual which must be held and used (processed) in accordance with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.
 - **Data Protection Officer (“DPO”):** public authorities are required to have a DPO to advise them on data protection law, monitor compliance and act as liaison with the Information Commissioners Office (“ICO”).
 - **Confidential Information:** any information that is not in the public domain and is intended to be protected from disclosure (whether it is proprietary in nature or whether by contract, legal protections such as trade secret laws, or other means). Information may be confidential irrespective of whether it is specifically labelled “confidential”, “proprietary” or otherwise, or whether it is oral, written, drawn or stored electronically. Alternatively, labelling information “confidential” or “proprietary” or other classification does not automatically make the information Confidential Information. Personal data may or may not be confidential.
 - **Employees:** someone who works directly for the City of London Corporation, either on a permanent or fixed-term contract of employment.

- **Workers:** includes agency, casual staff, work experience, interns, volunteers, consultants, contractors and those working under a contract for services.
- **Members:** An elected Member of the Court of Common Council (100 Common Councilmen and 25 Aldermen)
- **Intellectual Property:** intangible property that is the result of creativity, such as designs, patents, copyrights and trademarks.
- **Security Culture:** an environment in which employees, other workers and Members are conscious of security risks, proactively support measures implemented to mitigate those risks, and feel empowered to challenge behaviours which compromise safety and security.
- **Security Personnel:** representatives of the City Corporation Security Teams, and uniformed guard officers contracted by the City Corporation to provide security at City Corporation buildings and events.
- **Security Policies:** together this policy, all other policies procedures and guidance that relate to the security and behaviours of employees, other workers, Members and visitors. It also relates to information and security of IT and policies and procedures in respect of building security.

Responsibilities

Duties of the Town Clerk and Chief Executive:

9. The Town Clerk will ensure that all appropriate mechanisms are in place for this policy to be applied across the City Corporation. The Town Clerk will provide strategic leadership and ensure resources (including people and financial) are in place to discharge this policy and related security policies.

Duties of Heads of Corporate Departments and Directors:

10. Some Directors have specialist and key duties which must be discharged to ensure our Security Policies and arrangements are implemented. For example, the City Surveyor in relation to buildings and security policies and procedures; the Director of HR is responsible for employee related policies and training; the Chamberlain for the IT security, procurement and contracts and our financial assets.
11. All Chief Officers must ensure that all employees and workers in their departments:

- are aware of the City Corporation's security policies and understand the importance of compliance with them.
- receive regular messages through line management to comply with our security policies, to reinforce and embed a positive and proactive security culture.
- complete any required security training.

12. Chief Officers will ensure:

- that premises or buildings comply with the terms of any Building Protective Security Policy and /or guidance that is in place designed to ensure the physical security of our people, assets, intellectual property and confidential information.
- Any non-compliance with the security policies within their business or function area is dealt with in an appropriate and timely manner, and reported on the Security Incident Tracker, and in the case of serious breaches via the Corporate Security Director to the Security Board.
- Appropriate technical and organisational measures are in place to ensure the confidentiality, integrity and security of information, particularly personal data held by their Departments, and that data protection breaches are reported to the Data Protection Officer immediately.

Strategic Director of Security:

13. Strategic Director of Security will:

- Monitor and assess the overarching security environment both externally and internally and its impact on the City Corporation's security culture, policies and practice.
- From time to time revise or direct the revision of the security policies and the issue of new security policies.
- Provide guidance on the security policies where appropriate.
- Ensure direct training is made available on the security policies as required.

Duties of all Line Managers:

- Line managers will be responsible for ensuring their staff are fully cognisant with all security related instructions.
- Line managers will ensure that any issues of non-compliance by a member of their staff, are dealt with in an appropriate and proportionate manner (dependent upon the nature of the non-compliance) in accordance with the Employee Handbook and HR policies.

Duties of all employees and other workers:

14. All employees and other workers are required to:

- cooperate on all matters relating to safety and security whilst on City Corporation business including support of and adherence to all procedures and guidance, and all reasonable instructions. Failure to comply will be treated seriously.
- act in a responsible manner, conducive to the safety and security of themselves, colleagues and visitors to the City Corporation.
- wear their corporate identification pass at all times with photo clearly visible whilst on City Corporation premises and remove it on departure.
- make passes available for inspection by security personnel and comply with any security requests or instructions whilst on City Corporation premises.
- comply with the instructions of site security personnel for building access controls, in the event of an incident, emergency, drill or test, or any matter concerning security.
- ensure that all personal data and confidential information is securely used and stored, in accordance with the Employee Data Protection Policy, and any associated policies and guidelines. Information stored electronically must be secured appropriately for that system in accordance with the Employee Data Protection Policy and any other associated policies and guidance linked at the bottom of this policy.
- report as soon as practicable using the Security Incident Tracker and to a line manager any matters likely to jeopardise the security of our employees, other workers and visitors, or lead to the potential loss of City Corporation assets or information.

- without prejudice to the above, to ensure all data protection breaches are reported to the DPO as soon as they become known.
- ensure that all work undertaken, and data created or held with Government Security Classifications is stored, processed and destroyed in accordance with official guidance.

Links / Other resources

Employee Code of Conduct

Employee Data Protection Policy

Screening and Vetting Policy

Communication and Information System Use Policy

Security Incident Tracker

City Secure Hub

CityPeople Self-service Personal/ Friends and Family

Agenda Item 12

Committee(s)	Dated:
Board of Governors, City of London School for Girls	18 June 2018
Subject: Report of the Headmistress	Public
Report of: Ena Harrop, Headmistress, CLSG	For Information

Summary

Main Report

Forthcoming Events

18 th June	Year 12 BMAT Course
19 th June	Year 5 Taster Afternoon
	Year 12 Parent's Evening
20 th June	Year 6 Charity Sale
	Prep Open Evening
	Friends Committee Meeting
21 st June	Lunchtime Open Concert
	Senior School Open Evening
22 nd June	Sponsored Walk
25 th June	Y4, Guildhall Armed Forces Day Ceremony
	Year 10 Celebration Day
25 th June -5 th July	MOATFEST 18
25 th June – 6 th July	Year 11 Work Experience
26 th June	ABRSM Exams
	11+ Welcome Afternoon
27 th June	Land of Promises Drama Production
28 th June	Leavers Service & Art Exhibition
	Leavers Ball
29 th June	Drama Gala Evening
	Prep Opera Performance
2 nd July	Staff Tea
	Year 7 Drama Production
3 rd July	Year 10 Parents' Evening Prep Summer
	Outing
4 th July	Year 9 ILP Evening
	Year 6 Dinner
5 th July	Year 8 Shell Trip
	Summer Fair
	Year 11 Dinner
6 th July	Staff Breakfasts Year 6 Leavers' Party
	Term Ends 12pm

3 rd September	Staff Day
4 th September	Staff Day
5 th September	Induction Day for Year 3, 7, 12 & 13
6 th September	Term begins
12 th September	Prep Open Afternoon
13 th September	Year 13 Parents' Breakfast
	Year 13 Geography Trip
17 th September	Prep Open Afternoon
18 th September	11+ Open Morning
20 th September	School Photos
	Year 12 Parents' Breakfast
	Year 7 Information Evening
21 st September	Year 10 Parents' Breakfast
26 th September	Sixth Form Conference
27 th September	11+ Open Morning
	Scholars Concert
28 th September	Year 11 Parents' Breakfast
4 th October	Feeder Head Breakfast
	Year 8 Joint Social
5 th October	Prize Day
8 th October	Year 7 Challenge

Educational Visits

17 th -22 nd June	Year 10 Antibes Trip
23 rd -25 th June	Silver Duke of Edinburgh
23 rd -28 th June	Year 10 Granada Trip
23 rd -29 th June	Year 12 Biology Field course
29 th June -2 nd July	Year 7 and 8 Skern Lodge Trip
30 th June -4 th July	Gold Duke of Edinburgh
22 nd – 28 th July	Japan Young Scientists Workshop (Cambridge)
15 th – 22 nd August	CCF Sailing Trip Corfu
25 th – 28 th September	Year 5 Grove Trip
26 th -27 th September	Year 9 Carding Mill and Black Country Trip
27 th -30 th September	Year 11-13 Art Study Tour of Madrid

Governors' Visiting Days

1. The School is always delighted to welcome Governors to spend a day in school either attending lessons in a specific subject or else shadowing a particular year group. The Governors that have attended this term are:

Mr Robert Merrett on 3rd May
Mrs Elizabeth Phillips on the 11th May
Mr Tijs Broeke on the 16th May

- 2 Any Governors who would like to make a visit are asked to contact the Deputy Head at the school to discuss possible dates and the programme that would interest them.

Health and Safety

3. The minutes from the Health and Safety meeting held on the 18th April are attached for information (Annex A). An Invac test was carried out on 12th March 2018.
4. There have been 3 reportable incidents during the period from January to 18th June. 1 member of staff hurt her back lifting an item, she was already suffering from a bad back prior to this. 1 Member of staff fell down stairs due to loose stair nosing and 1 student dislocated her hip whilst doing the splits in a classroom.

Lettings

Hirer	Dates	Venue
Barbican Lawn Tennis Club	Various Evenings	Tennis Courts
Barbican Residents Association	26th April	Main Hall
BBC	27th January and 27th April	Main Hall
Barts London Water Polo	24th February	Swimming Pool
Crossrail	8th March	Committee Room
Cor et Lumen Christi Community	24th and 25th February	Main Hall
Global Harvesters Fellowship	Every Sunday	Main Hall or New Hall
Go Mammoth	Every Monday, Tues, Wed and Thursday Evenings	Gymnasium
Islington Boat Club	14th February	Swimming Pool
Lloyds Choir	22nd March	Committee Room
Locate Productions	6th April	Committee Room
Justin Craig Education	10th - 17th Feb and 3rd - 14th April	B Floor Classrooms
London Gay Men's Chorus	19th Feb, 19th March and 16th April	New Hall
London Symphony Chorus	2 Jan, 4 Jan, 9 Jan, 10 Jan 11 Jan 16 Jan 18 Jan 22 Jan 30 Jan 1 Feb 15 Feb 20 Feb 22 Feb 6 Mar 8 Mar 13 Mar 15 Mar 20 Mar 22 Mar 27 Mar 5 Apr 12 Apr 17 Apr 19 Apr 24 Apr 26 Apr	Main Hall / New Hall
London Symphony Orchestra	15th April	New Hall
London Philharmonic Choir	14th February and 17th March	Main Hall
London Gay Symphony Orchestra	4, 5, 8 and 14 January and 15 April	Main Hall
Royal Choral Society	Every Monday & the odd Wednesday	Main Hall

MEIWES/BRANDES	22nd April	Black Box
Regnum Christi UK	14th April	Main Hall
Royal Philharmonic Society	27th and 28th January	New Hall
SOS Internationale	4 - 10th April	New Hall / Main Hall
Tri For Fitness	Every Tuesday	Swimming Pool
Swimming Class	Every Sunday	Swimming Pool
Aquavision Synchronised Swimming	Every Sunday	Swimming Pool
Sport & Arts London Swimming	Every Saturday	Swimming Pool
Otter Swimming Club	Every Wednesday	Swimming Pool
3S Swim School	Every Mon, Thurs, Fri and Sunday	Swimming Pool

Summary of Staff Training Academics Year 17/18

Current Provision

Whole staff

5. For this academic year we have continued to split the training into two clear strands: academic and pastoral, recognising that both elements help to embed and reinforce the initiatives of each other. Whole staff training has been delivered as part of the Staff INSET day, during the staff INSET days.
6. The main academic focus of the training for teaching staff this year has been on embedding evidence based enquiry as a significant element of the school's CPD programme. This has been done by having Collaborative Enquiry Groups (CEGs) in which each teacher undertook a reflective enquiry to research and improve an element of their practice. Although this was predominantly teaching and learning focused, there were also pastoral enquiry questions that all fed into our overarching aim of ensuring every student reaches their potential.
7. Through this process staff made reference and built upon previous CPD training on Thinking Routines, Making Learning Visible, Assessment for Learning (AfL) and related pedagogical techniques.
8. This is the first year where we have run our new structure for CPD, following the agreement from governors and consultation with staff. The school has been finishing at 15:30 on a Monday each week. On week B, there have been sixty minute sessions for teaching staff which were used for either departmental CPD, staff meetings or a choice of CPD sessions (CEGs). In total, there will be between 16-18 sessions in any academic year.

The sessions have been split as follows:

2 staff meetings (SDP planning and one other)

7 departmental/faculty based CPD and planning sessions

7 CPD sessions on elected programme where staff have worked in one of six Collaborative Enquiry Groups (CEGS)

The titles of the 6 Collaborative Enquiry Group (2017/18) have been as follows:

- i. How can we reduce marking and improve impact?
- ii. How do we support students with specific learning needs (SEND)?
- iii. How can we get students to take more ownership of their own learning?
- iv. How can we challenge student perfectionism?
- v. How can group and pair work be used to improve learning?
- vi. How does pastoral support affect student progress?

9. There was some disruption to our initial model as one of the CEG sessions fell on the day of the incident that forced a school closure.
10. The year culminated in a Market Place on 21st May where staff displayed their findings to their peers. We were joined by Jonnie Noakes from Eton on the day, who commented very positively on the whole staff's engagement with reflective practice. It was obvious that the vast majority of members of staff had benefited hugely from working collaboratively with their peers. There were also some clear outcomes of research that will contribute to improved practice for all at school. To ensure the findings from the staff are valued and potentially acted upon they will be reviewed by the Assistant Head and Researcher in Residence to see if they can feed into the SDP.
11. We are extremely pleased with the outcome of this new model. Staff feedback has been incredibly positive, and we will be refining our approach next year to ensure that we maximise the benefits of the model.
12. Changes for next year will include:
 - a differentiated approach to the CEGs, with some requiring a greater element of individual research than others
 - the CEG research outcome to become one of the appraisal targets
 - facilitators of CEGS are to implement a more systematic research cycle (Look, Think, Act) with all staff
 - further staff training on research methods and active research will be delivered at the start of the year.
13. Departmental training has been led by the HoD's and was used to develop pedagogies specific to their subject. This training ranged from peer coaching or specific external training, to collaborative planning.

14. In addition to the CEG and Departmental training sessions staff also attended 3 sessions delivered by the SEND team (Kathleen O'Connor and Emma Heseltine) to explore specific aspects of how to support students with a SEND profile in our classrooms.

The titles of the three sessions were:

1. How to support students with Autistic Spectrum Disorders
 2. How to support students with Cognitive and Processing difficulties
 3. How to aid student Memory, Retrieval and Revision
15. The sessions were very well received and there is evidence from lesson observations and discussions with staff that the techniques suggested are being implemented.
 16. To fulfill our statutory and ISI Inspection obligations, all staff received 'Updates in Safeguarding' training delivered by the Safeguarding Lead and a Prevent update and a reminder that extremism comes in different forms delivered by the Deputy Safeguarding lead, both in September. The sessions centered on lessons to be learned from two serious case reviews and staff were reminded to report all concerns even if the information could not be verified and to be aware of the way that parents can disguise what is happening especially if they are articulate and in powerful positions. Also that all staff have a duty to take a matter further if they feel the school is not dealing with it adequately.
 17. In the autumn term all new middle leaders undertook Level 2 safeguarding training and one new SMT member completed the Level 3 safeguarding. Existing members of SMT completed a refresher course in Safer recruitment and the Head of PSHCE completed a course on PSHCE education in independent schools.
 18. Mark Cropley from Surrey University delivered an INSET Session on how to 'Work better not longer' - learn how to be more productive by switching off from work in the evenings, worrying less and facing the new working day fresh, full of energy and ambition. This session was a result of the Well-being committee's recommendations
 19. The Digital Sisters from DigitalAwarenessUK delivered an interactive workshop to students and then staff on E-Safety and online awareness in November 2017.

Training for different stages within a teacher's career

20. We continue in our commitment to support new teachers to the profession and as such, we currently have two members of staff undertaking their Newly Qualified Teacher (NQT) Induction and PGCE certification with us.
21. We are also developing our CPD provision for aspiring and new middle and senior managers. The Heads of Spanish and German were enrolled on the

Level 1 HMC/GSA ISQAM course. The Heads of History, Maths and Music completed / are completing the HMC/GSA ISQAM level 2 course and Head of D&T completed Level 1. This qualification supports them to lead their departments. Two pastoral middle leaders are also completing the ISPQ. Four teachers are undertaking the Aspiring Leadership Programme with ELC Schools, with a view to progress their career at CLSG. Two members of staff are completing their MA this year with one (potentially two) other staff starting and completing an MA this coming year. Another member of staff is being supported to complete a counselling qualification. In addition to this we have successfully embedded 8 new members of staff who are contributing positively to the school.

Individual INSET

22. In addition to whole staff training, teachers have attended a wide range of individual training courses. These include subject specific courses on changes to examination specifications, training for those with posts of pastoral responsibilities (Conference and the Mental Health and Well-being Conference) and courses relating to developing middle leaders capabilities.
23. Two staff members attended the International Conference on New Pedagogies for Deep Learning (NPDL). The conference has led to new international connections and ideas for the implementation of new pedagogies. The findings will be disseminated to staff over the next year.

Partnerships and outreach with other schools

24. Over the course of the academic year, a number of staff have been into the City family of schools to help support their staff in various subjects. This includes on-going support for the Maths department at The City Academy, Hackney and Shoreditch Park by several members of the CLSG Maths Department. The Head of Classics is working with pupils at Hackney to provide introductory Latin lessons for some of their pupils and one member of the English Department is providing extension lessons for Yr. 7s at Shoreditch Park.

Future CPD Provision

25. Following the successes of the new CPD process (2017-18) the plan for the coming academic year (2018–19) is to keep the format broadly the same.

It will consist of:

- 2 staff meetings (SDP planning and one other)
 - 7 departmental/faculty based CPD and planning sessions
 - 8 CPD sessions on elected programme where staff have worked in one of six Collaborative Enquiry Groups (CEGS) – This includes the ‘Market Place’
26. The dates of the sessions and order of the sessions has be adjusted for the coming year to reflect HoD’s requests to have more consecutive week B Mondays to tackle challenges in their subjects.

27. The CEG (2018–19) routes are being finalised currently and will take into account the following:
- What strategies make the biggest difference to student learning
 - The perceived developmental needs identified through observation
 - Staff feedback
28. We will continue to provide SEND, Safeguarding and any other mandatory training during staff and INSET days. Some training will be provided by staff and others by external providers where appropriate.

Data Protection Legislation

30. Late last year the Bursar flagged up to Governors that changes to Data Protection Legislation following the adoption of the General Data Protection Regulation 2016 and Data Protection Act 2018 would impact school policies and procedures. The scale of the work that has been undertaken and will continue to be undertaken throughout the rest of this year is considerable.
31. To date we have updated our Parent and Pupil Data Protection Policy (Annex B) which was approved under urgency procedures and is attached for Governor information, as well as the School's Privacy Notice (Annex C) for information. Both of which are now available on the School website and were launched to Parents ahead of 25 May deadline.
32. We sought views from Pupils on a pupil friendly version of the Privacy Notice and this is currently being drafted following feedback that the original was way too long and they were really only interested in the bits related to the data we hold on them, where to find their rights and how to complain. This will be redrafted with links signposting to the relevant sections of the main Privacy Notice in order to shorten the document.
33. In addition we have written to Alumni directing them to the new Privacy Notice. We will need to follow up with a communication to stay in touch by email regarding fundraising events.
34. Other work that we need to complete in the coming months:
- Review and update the Record of Processing Activity for the school – this is the mastersheet of the types of data we hold, why, how it is protected and who it is shared with;
 - Review:
 - Our data retention policy;
 - CCTV policy
 - Biometric data policy
 - Parent Contract
 - Offer Letters

- Safeguarding policy
 - Visits policy
 - Chase up third party data processors to ensure that they have appropriate policies in place
 - Conclude data sharing arrangements with key parties (UCAS etc)
35. In order to help with this work we have established a data management working group which has met a couple of times so far. It is a useful forum to explore our current practices, check that they are compliant and put things right where they aren't. In addition the group will be the main forum for any future changes to systems to policies to ensure we are compliant with the "Privacy by design" requirement of the new legislation.

List of Annexes

Annex A	Health and Safety Minutes
Annex B	Parent and Pupil Data Protection Policy
Annex C	School's Privacy Notice

Alan Bubbear

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City of London School for Girls

Health & Safety Committee Minutes

Meeting Held on 18th April 2018

Present: Alan Bubbear (Chairman), Jason Valentine (H&S Coordinator), Nicola Brown, Kelly Patterson, Caroline Castell, Andy Hill, Kirsty Packer, Kathleen O'Connor, Shafat Yeahia, Sadia Tasnim, Steven Berryman, Rachel Hadfield, Devas Palokkaran, Rhian Trevor, Toni Czogalik	
Apologies	
Vicky Pyke (Secretary)	
Item 1 Previous Minutes	
Minutes of January's meeting were approved.	
Item 2: Matters Arising	
<ul style="list-style-type: none"> <p>• Driver Assessment Course AB advised that there are still a number of staff still to complete the course. AB to contact the necessary individuals to remind them to complete. CC commented that her insurance is on the system. RT asked for a list of staff that had completed it to be circulated, because some staff can't remember whether they have or haven't completed it. AB to follow up.</p> <p>• Working at Heights Course JV advised that everyone who had requested to attend the course had been booked or had already attended. JV advised that anyone who uses ladders even only for a short time should book themselves onto the course. Options for bulk training over half term are not feasible due to staff availability. AB advised all staff not to stand on tables or chairs to install high level material and to raise a premises support call. A training day would be arranged at a later date if the staff numbers required it.</p> <p>• Dance Studio JV advised that temperature control in the dance studio is resolved and CC confirmed this.</p> <p>• Hazardous Waste Collection The new spreadsheet has been set up. The premises team are currently uploading their items, once the sheet is updated it will be emailed to other departments for completion.</p> 	AB
Item 3: Safety Drills	

Invac training was carried out last term, and an evacuation drill will be scheduled for the summer term.	AB
Item 4 Risk Register	
AB did not present the Risk Register, he updated the committee that there were no significant changes and a copy will be circulated with the minutes.	AB
Item 5 Health and Safety Accident Statistics	
There have been 3 reportable incidents during the period from January to 18 th June. 1 member of staff hurt back lifting an item; she was already suffering from a bad back prior to this. 1 Member of staff fell down stairs due to loose stair nosing and 1 student dislocated her hip whilst doing the splits in a classroom.	
JV highlighted the importance of also report near misses as these can often prevent accidents from occurring in the future.	
Item 6 Health and Safety Assurance Inspections Update	
JV advised that the first inspection of 2018 was carried out on the 9 th February, this was conducted in two parts with Mary Robey first and then the rest of the team later in the day.	
There were 17 observations all high item priorities were completed. JV advised that Assurance Inspection reports will be circulated with the minutes from now on.	
Thank you to Mary Robey for her time and effort as health and Safety Governor.	
The next inspection will be Friday 20 th April.	
Item 7 AOB	
The Science Department reported that after the last H&S meeting the chemical store leaves had not been cleared out. JV advised that all jobs must be reported on the premises support system/IT/Av as relevant.	
The Science Department reported that the windows do not open in the science labs. AB advised a long-term solution will be included with the science lab refurbishment, JV advised that he look at a short-term solution which has now been identified and will be ordered for all affected departments.	JV/AB
A request was made that all staff are copied to minutes rather than just committee members	VP



CITY OF LONDON SCHOOL FOR GIRLS

PUPIL & PARENT DATA PROTECTION POLICY

1. General Statement of the Duties of the City of London School for Girls

- 1.1. The City of London Corporation, PO Box 270, Guildhall, London EC2P 2EJ ('the City Corporation') is the Data Controller for personal data processed by the City of London School for Girls ('the School'). The City Corporation's Data Protection Officer is the Comptroller and City Solicitor and can be contacted at information.officer@cityoflondon.gov.uk. For any queries regarding this Policy, please contact the Bursar by emailing bursar@clsq.org.uk
- 1.2. The City Corporation, and the School, are required to process personal data regarding pupils, their parents and guardians as part of their operation, and shall take all reasonable steps to do so in accordance with this Policy, and data protection legislation i.e. the General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('the DPA').
- 1.3. The City Corporation, and the School are committed to ensuring that they protect the rights and freedoms of all individuals with respect to the personal data they hold about them and aim to have transparent systems for processing personal data.
- 1.4. This Policy applies to all current, past or prospective pupils at the School and their parents and guardians. Anyone who works for, or acts on behalf of, the School (including staff, volunteers, governors and service providers) must be aware of and comply with this Policy.

2. Data Protection Legislation

- 2.1. The City Corporation, and the School have the responsibility to comply with data protection legislation which applies to information relating to both "Personal Data" and "Special Categories" of personal data of a "Data Subject". These terms are defined below.
- 2.2. **Personal Data** is defined in the GDPR as information relating to and identifying a living individual who can be identified from the data. The School may process a wide range of personal data of pupils, their parents or guardians, as part of their operation, for example, names and contact details, date of birth, financial details; academic information, disciplinary, admissions and attendance records; references; and examination scripts and results, information stored in virtual learning environments, CCTV recordings etc.

2.3. **Special Categories of Personal Data** is defined in the GDPR as personal data which is highly sensitive which details racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic, biometric and health data, and data concerning a natural person's sex life or sexual orientation. For example, the School may process personal data relating to pupil special educational needs, safeguarding and medical history. The School may, in some cases, use pupils' biometric data as part of an automated biometric recognition system i.e. fingerprints to receive school dinners.

(Any reference to personal data in this Policy includes reference to 'Special Categories' of personal data, previously 'sensitive personal data').

2.4. **Data Subject** is defined as a natural (living) person whose personal data is processed. In this Policy, any reference to Data Subject means pupils (including current, past or prospective), parents and guardians.

2.5. **Processing** is defined very broadly and encompasses collecting, recording, organising, structuring, storing, adapting or altering, retrieving, consulting, using, disclosing, combining, restricting, erasing and destructing. In effect, any activity involving personal data falls within the scope of the DPA and GDPR.

3. Data Protection Principles

3.1. In order to comply with the data protection legislation, the School must comply with the six Data Protection Principles set out below:

Personal data must be:

- a) processed lawfully, fairly and in a transparent manner in relation to the data subject;
- b) collected only for specified, explicit and legitimate purposes. It must not be further processed in any manner incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed;
- d) accurate and, where necessary, kept up to date. Every reasonable step must be taken to ensure that data which is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay;
- e) not be kept in a form which permits identification of data subjects for longer than is necessary for the purposes for which the data is processed. Personal data may be stored for longer periods provided it is processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes. This is subject to the implementation of appropriate data security measures designed to safeguard the rights and freedoms of data subjects; and

- f) be processed in a manner that ensures its appropriate security. This includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage.

4. Conditions for Processing of Personal Data

4.1. There are a number of conditions set out in Article 6 of the GDPR which allow the School and its staff to process personal data. At least one of the following conditions must apply for the School to lawfully process personal data about Data Subjects:

- a) **Consent:** the Data Subject has given clear consent to process their personal data for a specific purpose. This may apply if for example, the School asks pupils for consent to use their photographs in school publications and on the School website or to carry out marketing for fundraising campaigns.

The School will rely on parental or guardian consent to process data relating to pupils under the age on 13. Parents should be aware that if their child is aged 13 or over, they may not be consulted.

NB: if relying on consent, it must be voluntarily given, specific, informed and unambiguous. Data Subjects must be able to easily withdraw consent at any point.

- b) **Contract:** the processing is necessary for a contract with the Data Subject, or because they have requested specific steps before entering into a contract. For example, any contracts that are in place with parents or guardians and any other associated agreements concerning personal data of pupils and parents i.e. the School's terms and conditions.
- c) **Legal obligation:** the processing is necessary in order to comply with the law (not including contractual obligations). For example, the School may have a legal obligation to provide certain personal data about pupils to the Department for Education (DfE).
- d) **Vital interests:** the processing is necessary to protect someone's life. This would apply where the Data Subject is physically or legally incapable of giving consent.
- e) **Public task:** the processing is necessary to perform a task in the public interest or for official functions, where the task or function has a clear basis in law.
- f) **Legitimate interests:** the processing is necessary in the School's legitimate interests or the legitimate interests of a third party, unless there is a good reason to protect the Data Subject's personal data which overrides those legitimate interests. This condition cannot be relied on by a public authority but shall apply to Independent Schools.

4.2. Where the School is processing special category data, set out in Article 9 of GDPR, it must ensure that a further condition for processing applies. A full list of these further conditions is available on request or otherwise at Article 9(2) of GDPR.

5. Disclosure of Personal Data to Third Parties

- 5.1. The School may receive requests from third parties (i.e. those other than the Data Subject, the School, and employees of the School) to disclose personal data it holds about pupils, their parents or guardians. This information will not generally be disclosed unless one of the conditions at section 5.2 apply.
- 5.2. The following are the most usual reasons that the School may have for passing personal data to third parties:
- (a) to give a confidential reference relating to a pupil;
 - (b) to give information relating to outstanding fees or payment history to any educational institution which it is proposed that the pupil may attend;
 - (c) to publish the results of public examinations or other achievements of pupils of the School;
 - (d) to disclose details of a pupil's medical condition where it is in the pupil's interests to do so, for example for medical advice, insurance purposes or to organisers of school trips;
 - (e) to provide information to another educational establishment to which a pupil is transferring;
 - (f) to provide information to the Examination Authority as part of the examinations process; and
 - (g) to provide information to the relevant Government Department concerned with national education. At the time of the writing of this Policy, the government Department concerned with national education is the Department for Education (DfE). The Examination Authority may also pass information to the DfE.
- 5.3. The DfE uses information about pupils for statistical purposes, to evaluate and develop education policy and to monitor the performance of the nation's education service as a whole. The statistics are used in such a way that individual pupils cannot be identified from them. On occasion the DfE may share the personal data with other Government departments or agencies strictly for statistical or research purposes.

6. Security of Personal Data

- 6.1. The City Corporation and the School will take reasonable steps to ensure that members of staff will only have access to personal data relating to pupils, their parents or guardians where it is necessary for them to do so. All staff will be made aware of this Policy and their duties under the Data Protection Legislation. The City Corporation and the School will take all reasonable steps to ensure that all personal information is held securely and is not accessible to unauthorised persons.

7. Retention of Personal Data

7.1. The School will have retention policies in place to ensure that personal data processed for any specified purposes shall not be kept for longer than is necessary for those purposes.

8. Data Subject Rights

8.1. Under the GDPR, Data Subjects have several rights, including, but not limited to the right to:

- a) Be provided with an age-appropriate Privacy Notice containing certain information about the processing activities (**Right to be Informed**);
- b) Confirmation of whether the School processes personal data about them and the right to access the personal data processed and obtain certain information about the processing activities (**Subject Access Request**) please see below at paragraph 9 for further information;
- c) Correct inaccurate personal data (**Rectification**);
- d) Have personal data erased under certain circumstances (**Erasement**);
- e) Restrict the processing of personal data under certain circumstances (**Restriction**);
- f) Receive a copy of the personal data the data controller holds under certain circumstances and transfer the personal data to another data controller (**Data Portability**);
- g) Object to processing of personal data (**Right to Object**);
- h) Not be subject to a decision based solely on automated processing, including profiling (**Automated Decisions**).

8.2. Data subjects can exercise these rights by contacting the Bursar at bursar@clsg.org.uk or the Data Protection Officer at information.officer@cityoflondon.gov.uk.

9. Requests for Access to Personal data (Subject Access Requests)

9.1. A subject access request must be made in writing and is free of charge. Where the request is not complete or clear, or satisfactory identification has not been given, the school will seek clarification from those making the request without undue delay.

9.2. All requests for access to personal data must be placed on the relevant pupil's file, and the City Corporation's Data Protection Officer (who at the time of writing is the Comptroller and City Solicitor) informed that the request has been received.

9.3. All requests for access to personal data must be passed to the Bursar of the School without undue delay.

9.4. The School Head or, in their absence, the Bursar, must authorise the applicant's request for access before **any** personal data is disclosed. The

School may also wish to seek advice from the Data Protection Officer in relation to disclosure.

- 9.5. A written response acknowledging the request must be sent to the applicant within **5 working days** of the request.
- 9.6. The GDPR requires a response to a request to be given within **one month** of the written request being received. The one month period does not begin until:
 - (a) a written application is received by anyone within the City of London Corporation (not when it has been passed on to and received by the School, or the Data Protection Officer);
 - (b) the School has received sufficient information to enable it to identify the individual who is seeking access; and
 - (c) the School has received sufficient information to enable it to identify and access the personal data requested.
- 9.7. The one month period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The School should inform the Data Subject of any such extension within one month of receipt of the request, together with the reasons for the delay.
- 9.8. Where the conditions set out above are fulfilled, in responding to the request, the School must provide confirmation as to whether or not personal data is being processed and where that is the case, access to the personal data and the following information:
 - a) the purposes of the processing;
 - b) the categories of personal data concerned;
 - c) the recipients or categories of recipients to whom the personal data have been or will be disclosed;
 - d) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
 - e) the existence of other rights in respect of the personal data (see section 8);
 - f) the right to lodge a complaint with the Information Commissioner's Office;
 - g) where personal data are not collected from the data subject, any available information as to their source;
 - h) the existence of automated decision-making, including profiling and reasons for carry out such processing.
- 9.9. Data subjects are not entitled to information where restrictions to the right of access apply. The restrictions are set out in Article 23 of GDPR. Moreover, in these circumstances, the School must only give a notification to the data subject that no information has been identified which is required to be supplied under the GDPR.

10. Authorisation of Access to Personal Data on Behalf of a Child or Young Person

- 10.1. A child or young person may appoint a person with parental responsibility for him or her to request access to their personal data. In such circumstances the School must have written evidence that the child or young person has authorised the person with parental responsibility to make the application.
- 10.2. The Head or, in their absence, the Bursar will determine what information will be shared with the person with parental responsibility. Access to personal data will be refused in instances where, for example, disclosure may place a child at risk of significant harm or jeopardise police investigations into any alleged offence(s).
- 10.3. Where a child or young person does **not** have sufficient understanding to make his or her own request, a person with parental responsibility can make a request on their behalf. The Head or, in their absence, the Bursar must, however, be satisfied that:
- (a) the child or young person lacks sufficient understanding; and
 - (b) the request made on behalf of the child or young person is in their interests.
- 10.4. The School will only grant to pupils access to their personal data if the child is aged 13 or over and is satisfied that the child is competent to exercise their own rights.
- 10.5. 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 or guardian, the School will maintain confidentiality unless it has reasonable grounds to believe that the pupil does not fully understand the consequences of withholding their consent, or where the School believes disclosure will be in the best interests of the pupil or other pupils. This will be assessed on a case by case basis.

11. Disclosure of Personal Data

- 11.1. If the request is made electronically, the information should be provided in a commonly used electronic format, unless:
- (a) the supply of such a copy is not possible;
 - (b) supplying it in permanent form would involve disproportionate effort (in which case another way of viewing the data must be agreed with the applicant); or
 - (c) the data subject agrees otherwise.
- 11.2. Only relevant documents from the pupil's file will be duplicated and disclosed to the applicant who, if requested, should be given a copy of the duplicated document. The School may charge a reasonable fee based on administrative costs for duplicate copies.

11.3. An individual is not entitled to information where:

- (a) restrictions to the right of access apply, or
- (b) another person, including any family member, has not given their written consent to disclose information that identifies them (see below).

11.4. Information contained in the Data Subject's records is likely to contain personal data about other individuals. Information about or identifying another individual must not be disclosed to the Data Subject seeking access to the information without that other individual's written consent.

11.5. In deciding whether it is reasonable to disclose information to the Data Subject without consent from the other individual, the School must not adversely affect the rights and freedoms of other individuals, and have regard to all relevant circumstances, including:

- The type of information that would be disclosed;
- Any duty of confidentiality;
- Any steps taken by the School with a view to seeking the consent of the other individual;
- Whether the other individual is capable of giving consent;
- Any express refusal of consent by the other individual

11.6. There is also a general presumption in favour of disclosing personal data relating to employees, where this information is integral to the personal data of the applicant. So, the records kept by teachers in the course of their employment in respect of pupils may be disclosable.

11.7. Any request by an individual for access to their personal data must be complied with subject to this paragraph and to the restrictions and exemptions set out in paragraphs 12.1.-12.5. below. The School may, however, make a request for more specific details of the information sought.

11.8. A request for access to personal data without the permission of the individual must be directed to the Data Protection Officer.

11.9. A record of the personal data disclosed in response to a request for access should be kept on the pupil's file, including details of any restrictions or exemptions to disclosure relied upon.

12. Restrictions and Exemptions to Access by Data Subjects

12.1. Confidential references given, or to be given by the School, are exempt from access. The School will therefore treat as exempt any reference given by them for the purpose of the education, training or employment, or prospective education, training or employment of the Data Subject.

12.2. It should be noted that confidential references received from other parties may also be exempt from disclosure, under the common law of confidence.

However, such a reference can be disclosed if such disclosure will not identify the source of the reference or where, notwithstanding this, the referee has given their consent, or where disclosure is reasonable in all the circumstances.

12.3. Examination scripts, that is information recorded by pupils during an examination, are exempt from disclosure. However, any comments recorded by the examiner in the margins of the script are not exempt even though they may not seem of much value without the script itself.

12.4. Examination marks do not fall within an exemption as such. However, the one month time limit for responding to a request is extended in relation to examination marks to either five months from the day on which the School received the request, or 40 days from the announcement of the examination results, whichever is the earlier.

12.5. Where a claim to legal professional privilege could be maintained in legal proceedings, the information is exempt from disclosure.

13. Manifestly Unfounded or Excessive Requests

13.1. Where requests from a Data Subject are manifestly unfounded or excessive, in particular because of their repetitive character, the School may either:

- a) charge a reasonable fee taking into account administrative costs of providing the information or taking the necessary action; or
- b) refuse to act on the request.

14. Complaints

14.1. If a Data Subject believes that the School has not complied with this Policy or acted in accordance with the GDPR or the DPA they should utilise the School's complaints procedure.

14.2. If the Data Subject is still not satisfied, they may make representations to the Information Commissioner, Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF. Tel (01626) 545 700.

Last reviewed: 14 May 2018
Approved by Governors: 21 May 2018
Next review due: 21 May 2021

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PRIVACY NOTICE

WHO WE ARE

This notice describes how the City of London School for Girls (St Giles' Terrace, Barbican, London EC2Y 8BB), collects 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 School for the purposes of the relevant legislation. The 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.

This notice relates to prospective and current parents, prospective, current and past pupils. A separate privacy notice covers former parents and pupils and a further privacy notice covers staff.

WHAT THIS PRIVACY NOTICE IS FOR

This policy is intended to provide information about how the school will use (or "process") personal data about individuals including: its current, past and prospective pupils; and their parents, carers or guardians (referred to in this policy as "parents").

This information is provided because Data Protection Law gives individuals rights to 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 **Privacy Notice** applies alongside any other information the school may provide about a particular use of personal data, for example when collecting data via an online or paper form.

This **Privacy Notice also** applies in addition to the school's other relevant terms and conditions and policies, including:

- any contract between the school and the parents of pupils;
- the school's policy on taking, storing and using images of children;
- the school's CCTV and/or biometrics policy;
- the school's retention of records policy;
- the school's safeguarding, pastoral, or health and safety policies, including as to how concerns or incidents are recorded; and
- the school's IT policies.

Anyone who works for, or acts on behalf of, the school (including staff, volunteers, governors and service providers) should also be aware of and comply with this Privacy Notice.

RESPONSIBILITY FOR DATA PROTECTION

- The School has appointed the Bursar as e.g. the Privacy and Compliance Officer who will deal with all your requests and enquiries concerning the school's uses of your personal data (see section on Your Rights below) and endeavour to ensure that all personal data is processed in compliance with this policy and Data Protection Law. The Bursar can be contacted at bursar@clsg.org.uk
- In addition the City of London Corporation has appointed the Comptroller and City Solicitor as the Data Protection Officer for the City Corporation. The Bursar is responsible to the Data Protection Officer for Data Protection Issues affecting the School

WHY THE SCHOOL NEEDS TO PROCESS PERSONAL DATA

In order to carry out its ordinary duties to pupils and parents, the school needs to process a wide range of personal data about individuals (including current, past and prospective, pupils or parents) as part of its daily operation.

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 parents of its pupils.

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 you, 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 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;
- 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;
- For security purposes, including biometrics and CCTV in accordance with the school's biometrics or CCTV policy;
- To carry out or cooperate with any school or external complaints, disciplinary or investigation process; and
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the school.

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, such as for security and other forms of pupil identification (door entry systems, lunch etc.);
- 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; or
- 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.

TYPES OF PERSONAL DATA PROCESSED BY THE SCHOOL

This will include by way of example:

- names, addresses, telephone numbers, e-mail addresses and other contact details;
- biometric information, which will be collected and used by the school in accordance with the school's biometrics policy;
- bank details and other financial information, e.g. about parents who pay fees to the school;
- past, present and prospective pupils' academic, disciplinary, admissions and attendance records (including information about any special needs), and examination scripts and marks;
- where appropriate, information about individuals' health and welfare, and contact details for their next of kin;
- 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;
- correspondence with and concerning pupils and parents past and present; and
- images of pupils (and occasionally other individuals) engaging in school activities, and images captured by the school's CCTV system (in accordance with the school's policy on taking, storing and using images of children);

HOW THE SCHOOL COLLECTS 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).

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).

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); and
- appropriate regulatory bodies e.g. the [Independent Schools Inspectorate](#), or the Information Commissioner.

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; and
- pastoral or safeguarding files.

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.

Staff, pupils and parents are reminded that the school is under duties imposed by law and statutory guidance (including [Keeping Children Safe in Education](#)) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the school's Safeguarding Policy.

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.

HOW DATA IS STORED

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

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. Currently, the Independent Inquiry into Child Sexual Abuse is reviewing historic cases. The school has been advised to retain all records until the Inquiry has concluded and any recommendations on record retention have been made.

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 the Bursar bursar@clsg.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").

KEEPING IN TOUCH AND SUPPORTING THE SCHOOL

The school, and the City of London Old Girls' Association, will use the contact details of parents, alumni and other members of the school community to keep them updated about the activities of the school, or alumni and parent events of interest, including by sending updates and newsletters, by email and by post. Unless the relevant individual objects, the school will also:

- Share personal data about parents and/or alumni, as appropriate, with organisations set up to help establish and maintain relationships with the school community, such as the City of London Old Girls Association;
- Contact parents and/or alumni (including via the organisations above) by post and email in order to promote and raise funds for the school, where we have their consent to do so;
- Collect information from publicly available sources about parents' and former pupils' occupation and activities, in order to help with events such as career days at school, speaker programmes and mentoring programmes;
- Should you wish to limit or object to any such use, or would like further information about them, please contact the Bursar in writing. You always have the right to withdraw consent, where given, or otherwise object to direct marketing or fundraising. However, the school is nonetheless likely to retain some of your details (not least to ensure that no more communications are sent to that particular address, email or telephone number).

YOUR RIGHTS

- Rights of access, etc.

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.

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 Bursar.

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 month in the case of requests for access to information).

The school will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the school may ask you to reconsider, or require a proportionate fee (but only where Data Protection Law allows it).

- Requests that cannot be fulfilled

You should be aware that the right of access is limited to your own personal data, and certain data is exempt from the right of access. This will include information which identifies other individuals (and parents need to be aware this may include their own children, in certain limited situations – please see further below), or information which is subject to legal privilege (for example legal advice given to or sought by the school, or documents prepared in connection with a legal action).

The school is also not required to disclose any pupil examination scripts (or other information consisting solely of pupil test answers), provide examination or other test marks ahead of any ordinary publication, nor share any confidential reference given by the school itself for the purposes of the education, training or employment of any individual.

You may have heard of the "right to be forgotten". However, we will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your (or your child's) personal data: for example, a legal requirement, or where it falls within a legitimate interest identified in this Privacy Notice. All such requests will be considered on their own merits.

- Pupil requests

Pupils can make subject access requests for their own personal data, provided that, in the reasonable opinion of the school, they have sufficient maturity to understand the request they are making (see section **Whose Rights?** below). A pupil of any age may ask a parent or other representative to make a subject access request on his/her behalf.

Indeed, while a person with parental responsibility will generally be entitled to make a subject access request on behalf of younger pupils, the law still considers the information in question to be the child's: for older pupils, the parent making the request may need to evidence their child's authority for the specific request.

Pupils aged e.g. 13 and above are generally assumed to have this level of maturity, although this will depend on both the child and the personal data requested, including any relevant circumstances at home. Older Prep School children may however be sufficiently mature to have a say in this decision, depending on the child and the circumstances.

- Parental requests, etc.

It should be clearly understood that the rules on subject access are not the sole basis on which information requests are handled. Parents may not have a statutory right to information, but they and others will often have a legitimate interest or expectation in receiving certain information about pupils without their consent. The school may consider there are lawful grounds for sharing with or without reference to that pupil.

Parents will in general receive educational and pastoral updates about their children, in accordance with the Parent Contract. Where parents are separated, the school will, in most cases, aim to provide the same information to each person with parental responsibility, but may need to factor in all the circumstances including the express wishes of the child.

All information requests from, on behalf of, or concerning pupils – whether made under subject access or simply as an incidental request – will therefore be considered on a case by case basis.

- 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: e.g. biometrics, certain types of uses of images, certain uses of medical information for instance on school trips. 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 alumni or parents' association has been requested).

- Whose rights?

The rights under Data Protection Law belong to the individual to whom the data relates. However, the school will often rely on parental authority or notice for the necessary ways it processes personal data relating to pupils – for example, under the parent contract, or via a form. Parents and pupils should be aware that this is not necessarily the same as the school relying on strict consent (see section on Consent above).

Where consent is required, it may in some cases be necessary or appropriate – given the nature of the processing in question, and the pupil's age and understanding – to seek 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 parents, 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. That is 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; for example where the school believes disclosure will be in the best interests of the pupil or other pupils, or if required by law.

Pupils are required to respect the personal data and privacy of others, and to comply with the school's Pupil Handbook and ICT and eSafety Policy and the school rules.

DATA ACCURACY AND SECURITY

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 please notify the Bursar of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate information about them is erased or corrected (subject to certain exemptions and limitations under Data Protection Law): please see above for details of why the school may need to process your data, and who you may contact if you disagree.

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.

THIS POLICY

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.

QUERIES AND COMPLAINTS

Any comments or queries on this policy should be directed to the Bursar using the following contact details bursar@clsq.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 complaints policy. 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.

Last Updated: 14 May 2018

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