

St John's College, Cambridge, Data Protection Statement: Choristers and Probationers (under sixteen)

The Data Controller is St John's College Cambridge. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd [12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk]: OIS Ltd should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the College Data Protection Lead, St John's College, Cambridge, CB2 1TP; 01223 338631; dataprotection@joh.cam.ac.uk.

What data are processed, and why?

As articulated in College Statute II(1) when detailing the qualifications and duties of the Master, and in other mission statements, the College has throughout its history been characterised as 'a place of Education, Religion, Learning and Research'. For nearly four centuries we have recruited to and run a Choir, to enhance and continue our obligations of providing services in the College Chapel in accordance with the liturgy and ceremonials of the Church of England. We process data on a number of talented singers under the age of sixteen, who are not members of the College but who are educated at the College's preparatory school, which has **its own data protection statements**.

In return for choral scholarships, these young people undertake commitments to the Choir, including singing at Evensong and other special services in Chapel, and touring in the UK and overseas to fulfil choral engagements arranged by the College. As a necessary step to honour our legal, financial and personal commitments to and contracts with these young people and their parents, we process names, dates of birth, passport details, parents' names, home addresses, declared medical conditions and treatment plans, medication lists, declared behavioural issues and agreed protocols to deal with these issues, (under 16s don't have NI numbers), formal contracts with the College, health certificates, bank and building society details, voice details, notes of progress with singing and musical lessons, records of participation in tours and events, and correspondence with parents and the College School prior to and after admission as a Chorister or Probationer. In the case of health data, which is special category data, data is processed under GDPR Article 9.2(d).

Where does the data come from?

The personal data are supplied by the Chorister or Probationer, by their parents or guardians, by the Headmaster, teaching and pastoral colleagues, the School Nurse and the Secretary of

St John's College School, by the Chorister's or Probationer's GP and by the Choir's medical advisor.

Sharing with Third Parties

To honour legal commitments and contracts that form part of our obligation to remunerate and care for the Choristers and Probationers, and to make contractual arrangements for Choir events and tours, we share some of this data with the following third parties:

The College School.

Members of the College Council's Choir Advisory Committee (comprised of named Fellows, School Headmaster and certain members of the Chapel and Choir Office staff).

Members of the College Finance Department, to enable termly fee payments to be made by electronic transfer, as agreed by parents/guardians.

Banks or building societies, to open accounts, as agreed by parents/guardians.

The Police, in certain cases where Safeguarding issues have been raised.

The local Magistrates' Court, to obtain licences to take choristers overseas, as agreed by parents/guardians.

Cambridgeshire County Council, in order to obtain performance licences, as agreed by parents/guardians.

Travel agents, airlines, insurance companies, and tour promoters, in order to make possible Choir tours – the personal information form supplied by the parent/guardian gives permission to share information for tour purposes.

Concert promoters, recording companies and specialist media outlets, for the promotion of performances, recordings and interviews.

Other than in the limited cases of concert or tour promotion, we do not pass any personal data collected to these ends outside the European Economic Area.

Retention of data

Most personal data are deleted or destroyed no later than seven years after a child has left the Choir. However, in cases where a document lists all the choristers, for example, a Magistrates' Licence, we are legally obliged to keep it until the last person on the list to leave

the Choir has been gone for seven years. We retain data for these periods in line with legal obligations and in order to respond to any issues raised by the Chorister or Probationer or their parents/guardians as a result of their participation in Choir activities.

Rights of the Data Subject

The Chorister or Probationer as 'data subject' has the right: to ask us for access to, rectification or erasure of their personal information; to restrict processing (pending correction or deletion); to object to communications; and to ask for the transfer of their personal information electronically to a third party (data portability). In certain circumstances, the data subject's parents/guardians also enjoy these rights.

Some of these rights are not automatic, and we reserve the right to discuss with the data subject why we might not comply with a request from them to exercise such rights.

If data subjects or their parents/guardians have questions or concerns about their personal information, or how it used, they are invited to speak to the **College Chapel and Choir Office staff** in the first instance. If in need of further guidance, they are asked to contact the College Data Protection Lead using the details given above.

If data subjects, or their parents/guardians, remain unhappy with the way their information is being handled, or with the response received from us, they have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

April 2018

Revised 2024