



Saint Jérôme Church of England Bilingual School

Cookie Policy

Policy created:	Not previously a standalone policy: the live site used only default plugin text
Policy reviewed and updated:	September 2026
Date of next review:	September 2027
Review cycle:	Annually, and whenever the website's cookies or analytics tools change.
Linked policies:	Data Protection Policy, Privacy Notice for Visitors.

Version history

Date	Version	Summary of changes
Undated	V1	Not a genuine standalone policy: the live site's 'Cookie Policy' page and cookie banner both used the unedited default text from a WordPress cookie consent plugin ('This website uses cookies to improve your experience. We'll assume you're ok with this, but you can opt-out if you wish'). This is a real compliance problem, not just stale wording: current ICO guidance on PECR, finalised 29 April 2026, is explicit that continued browsing or an implied 'we'll assume you're okay' model is not valid consent, and that non-essential cookies must not be set until the visitor has actively opted in. Maximum PECR fines rose 35-fold to £17.5 million from February 2026 under the Data (Use and Access) Act 2025.
September 2026	V2	Written as a genuine, school-specific policy for the first time. Checked against current ICO/PECR guidance and against Harrow Council's own school-facing website, which uses a compliant model ('necessary cookies... analytics cookies... set only if you accept'), now reflected here. Set out the three narrow PECR exemptions introduced from 5 February 2026 for certain low-risk analytics and similar technologies, and where they do and do not apply. Reflected the Data (Use and Access) Act 2025's new formal complaints-handling duty, in force from 19 June 2026, consistent with the equivalent change already made to the Data Protection Policy and all five Privacy Notices.

1. About This Policy

This policy explains how Saint Jérôme Church of England Bilingual School uses cookies and similar technologies on our website, stjeromebilingual.org, in line with the Privacy and Electronic Communications Regulations (PECR) and UK GDPR. It should be read alongside our Data Protection Policy and our Privacy Notice for Visitors.

2. What Are Cookies?

Cookies are small text files placed on your device when you visit a website. They are widely used to make websites work, or work more efficiently, as well as to provide information to the website owner. This policy also covers similar technologies that store or access information on your device, such as pixels and web storage, in line with current ICO guidance.

3. The Cookies We Use

Strictly Necessary Cookies

These cookies are essential for the website to function, for example to remember your cookie consent choices as you move between pages, or to support basic security features. Strictly necessary cookies do not require your consent, but we still tell you about them here for transparency, and they do not store personal information beyond what is needed for the website to work.

Analytics Cookies

We may use analytics cookies, such as those from Google Analytics, to understand how visitors use our website, for example which pages are most visited and how long visitors spend on the site. This helps us improve the website for parents, prospective parents and the wider school community. Analytics cookies are not strictly necessary and are only set with your consent, given through our cookie banner.

Third-Party and Embedded Content Cookies

Some pages on our website may include content embedded from other websites, for example a video or a map. These sites may set their own cookies, over which we have no direct control. If you do not see a cookie consent option for embedded content, visiting the relevant third party's own website will explain how they use cookies.

4. Your Choices

When you first visit our website, you will be shown a cookie banner allowing you to accept or reject non-essential cookies, such as analytics cookies. You can change your choice at any time by clearing your cookies in your browser settings, which will cause the banner to reappear on your next visit.

Most web browsers also allow some control of cookies through browser settings. You can usually find these settings in the 'options' or 'preferences' menu of your browser. Blocking all cookies, including strictly necessary ones, may affect the functionality of this and many other websites.

5. Complaints

If you have any concerns about how cookies are used on our website, please raise this with us in the first instance by contacting the school office, office@stjeromebilingual.org or 020 3019 6363.

Alternatively, if you remain dissatisfied, you can refer a complaint to the regulator, currently known as the Information Commissioner's Office (ICO), becoming the Information Commission from 30 September 2026:

- Report a concern online at ico.org.uk/concerns
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

6. A Note on the Website's Cookie Banner

Current ICO guidance on PECR, finalised 29 April 2026, requires that a cookie banner offer 'Accept' and 'Reject' with equal visual prominence, that non-essential cookies are not set until the visitor has actively opted in, and that continued browsing is never treated as consent. The maximum penalty for non-compliance rose 35-fold to £17.5 million from February 2026, under the Data (Use and Access) Act 2025; while enforcement action against a small primary school website is unlikely, the underlying requirement applies to us in the same way as to any other organisation.

The wording previously shown on our website ('we'll assume you're ok with this, but you can opt-out if you wish') describes exactly the kind of implied consent the ICO's guidance says is not valid. This policy document sets out what our cookie practice should be; it does not, by itself, change what the live banner currently does. We recommend that whoever manages the school's Schudio website reviews and reconfigures the cookie consent banner as a priority, so that it matches the approach set out in this policy: necessary cookies only, with analytics and any other non-essential cookies set only after clear, active consent.