



## Manchester High School for Girls

### Privacy Notice

#### Children at the School over the age of 13

The purpose of this notice is to help you understand how the school will use and share your personal information and what we do with that information including how we share personal data with appropriate third parties.

#### How will we use and share pupil information

In order to carry out its ordinary duties to pupils, the school needs to process a wide range of personal data about individuals (including current, past and prospective pupils) 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. 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 individuals, and provided it does not involve special or sensitive types of data.

The types of information that we collect, hold and share include:

•	Personal information (such as pupil names, date of birth, and home addresses);
•	Special characteristics (such as an individual photograph, CCTV images, preferred language, gender, ethnicity, religion, nationality and country of birth);
•	Attendance information (such as being at events and teaching/sport sessions, number of absences and absence reasons);
•	Sensitive information related to pastoral needs, health or medical care and special educational needs.

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 or spiritual development, career services, and extra-curricular activities to pupils, and monitoring pupils' progress and educational needs;
- Maintaining relationships with alumni and the school community, including direct marketing or fundraising activity;
- For the purposes of management planning and forecasting, research and statistical analysis, including that imposed or provided for by law;
- 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 and on the school website in accordance with the school's policy on taking, storing and using images of children;
- For security purposes, including CCTV in accordance with the school's CCTV notices;
- 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.

### **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 pupils with third parties, such as:

- government authorities (e.g. DfE, police or the local authority);
- examination boards;
- Data analysis Centres e.g. CEM; and
- appropriate regulatory bodies e.g. the Teaching Regulation Agency, 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 doctor and appropriate medical staff under her supervision, 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.

It is not necessary for data to be shared with other countries. The exception to this will be international trips that the School organises, should this be envisaged for you, you will be contacted for your consent, the consent will be limited in time and content if it is required.

The retention period for pupil data will be until you reach the age of 25 and / or be modified by any other legal obligation the School finds itself under. This includes incident reports and safeguarding files which will need to be kept for much longer. Separate privacy notices exist for the Development and Archive Departments which will store and process some pupil data indefinitely.

You have the right to withdraw your consent to data processing at any time, however this will only apply to certain groups of data for which you have given particular consent.

You can complain at any time about how the School has handled your data, the Information Commissioner is available as follows:

**ICO helpline is 0303 123 1113.**

**A template letter, should you need it is at the appended to this notice.**

We will obtain the data the School requires from you, should we need data from other sources we will contact you. We see the provision of personal data as necessary to properly manage your time at the School and for the School to fulfil its obligations to you.

There is no automated decision making or profiling involved handling this data.

## **Appendix**

### **Template letter**

[Your full address]  
[Phone number]  
[The date]

[Name and address of the organisation]  
[Reference number (if provided within the initial response)]

Dear [Sir or Madam / name of the person you have been in contact with]

#### **Information rights concern**

[Your full name and address and any other details such as account number to help identify you]

I am concerned that you have not handled my personal information properly.

[Give details of your concern, explaining clearly and simply what has happened and, where appropriate, the effect it has had on you.]

I understand that before reporting my concern to the Information Commissioner's Office (ICO) I should give you the chance to deal with it.

If, when I receive your response, I would still like to report my concern to the ICO, I will give them a copy of it to consider.

You can find guidance on your obligations under information rights legislation on the ICO's website ([www.ico.org.uk](http://www.ico.org.uk)) as well as information on their regulatory powers and the action they can take.

Please send a full response within 28 calendar days. If you cannot respond within that timescale, please tell me when you will be able to respond.

If there is anything you would like to discuss, please contact me on the following number [telephone number].

Yours faithfully  
[Signature]