

## DATA PROTECTION POLICY

### 1. Aims

Our school aims to ensure that all personal data collected about staff, pupils, parents, governors, visitors and other individuals is collected, stored and processed in accordance with UK data protection law. This policy applies to all personal data, regardless of whether it is in paper or electronic format.

### 2. Legislation and guidance

This policy meets the requirements of the:

- UK General Data Protection Regulation (UK GDPR) – the EU GDPR was incorporated into UK legislation, with some amendments, by [The Data Protection, Privacy and Electronic Communications \(Amendments etc\) \(EU Exit\) Regulations 2020](#)
- [Data Protection Act 2018 \(DPA 2018\)](#)
- It is based on guidance published by the Information Commissioner's Office (ICO) on the [GDPR](#).
- It also reflects the ICO's [code of practice](#) for the use of surveillance cameras and personal information.

### 3. Definitions

| TERM                                       | DEFINITION                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |
|--------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Personal data</b>                       | <p>Any information relating to an identified, or identifiable, living individual.</p> <p>This may include the individual's:</p> <ul style="list-style-type: none"> <li>• Name (including initials)</li> <li>• Identification number</li> <li>• Location data</li> <li>• Online identifier, such as a username</li> </ul> <p>It may also include factors specific to the individual's physical, physiological, genetic, mental, economic, cultural or social identity.</p>                                                             |
| <b>Special categories of personal data</b> | <p>Personal data which is more sensitive and so needs more protection, including information about an individual's:</p> <ul style="list-style-type: none"> <li>• Racial or ethnic origin</li> <li>• Political opinions</li> <li>• Religious or philosophical beliefs</li> <li>• Trade union membership</li> <li>• Genetics</li> <li>• Biometrics (such as fingerprints, retina and iris patterns), where used for identification purposes</li> <li>• Health – physical or mental</li> <li>• Sex life or sexual orientation</li> </ul> |

| TERM                        | DEFINITION                                                                                                                                                                                                              |
|-----------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Processing</b>           | Anything done to personal data, such as collecting, recording, organising, structuring, storing, adapting, altering, retrieving, using, disseminating, erasing or destroying.<br>Processing can be automated or manual. |
| <b>Data subject</b>         | The identified or identifiable individual whose personal data is held or processed.                                                                                                                                     |
| <b>Data controller</b>      | A person or organisation that determines the purposes and the means of processing of personal data.                                                                                                                     |
| <b>Data processor</b>       | A person or other body, other than an employee of the data controller, who processes personal data on behalf of the data controller.                                                                                    |
| <b>Personal data breach</b> | A breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data.                                                                      |

#### 4. The data controller

Our school processes personal data relating to parents, pupils, staff, governors, visitors and others, and therefore is a data controller.

The school is registered with the ICO, as legally required.

#### 5. Roles and responsibilities

This policy applies to **all staff** employed by our school, and to external organisations or individuals working on our behalf. Staff who do not comply with this policy may face disciplinary action.

##### 5.1 Governing Body

The governing board has overall responsibility for ensuring that our school complies with all relevant data protection obligations.

##### 5.2 Privacy and Compliance Officer

The Privacy and Compliance Officer (PCO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guidelines where applicable.

They will provide an annual report of their activities directly to the governing board and, where relevant, report to the board their advice and recommendations on school data protection issues.

The PCO is also the first point of contact for individuals whose data the school processes, and for the ICO. Our PCO is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

##### 5.3 Head Mistress

The Head Mistress acts as the representative of the data controller on a day-to-day basis.

##### 5.4 All staff

Staff are responsible for:

- Collecting, storing and processing any personal data in accordance with this policy
- Informing the School of any changes to their personal data, such as a change of address
- Contacting the PCO in the following circumstances:
  - > With any questions about the operation of this policy, data protection law, retaining personal data or keeping personal data secure
  - > If they have any concerns that this policy is not being followed

- If they are unsure whether or not they have a lawful basis to use personal data in a particular way
- If they need to rely on or capture consent, draft a privacy notice, deal with data protection rights invoked by an individual, or transfer personal data outside the UK
- If there has been a data breach
- Whenever they are engaging in a new activity that may affect the privacy rights of individuals If they need help with any contracts or sharing personal data with third parties

## 6. Data protection principles

The UK GDPR is based on data protection principles that our school must comply with.

The principles say that personal data must be:

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary to fulfil the purposes for which it is processed
- Accurate and, where necessary, kept up to date
- Kept for no longer than is necessary for the purposes for which it is processed
- Processed in a way that ensures it is appropriately secure

This policy sets out how the school aims to comply with these principles.

## 7. Collecting personal data

### 7.1 Lawfulness, fairness and transparency

We will only process personal data where we have one of 6 'lawful bases' (legal reasons) to do so under data protection law:

- The data needs to be processed so that the school can **fulfil a contract** with the individual, or the individual has asked the school to take specific steps before entering into a contract
- The data needs to be processed so that the school can **comply with a legal obligation**
- The data needs to be processed to ensure the **vital interests** of the individual or another person i.e. to protect someone's life
- The data needs to be processed so that the School can **perform a task in the public interest or exercise its official authority**
- The data needs to be processed for the **legitimate interests** of the school (where the processing is not for any tasks the School performs as a public authority) or a third party, provided the individual's rights and freedoms are not overridden
- The individual (or their parent/carer when appropriate in the case of a pupil) has freely given clear **consent**

For special categories of personal data, we will also meet one of the special category conditions for processing under data protection law:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **explicit consent**
- The data needs to be processed to perform or exercise obligations or rights in relation to **employment, social security or social protection law**
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent
- The data has already been made **manifestly public** by the individual
- The data needs to be processed for the establishment, exercise or defence of **legal claims**
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation
- The data needs to be processed for **health or social care purposes**, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law

- The data needs to be processed for **public health reasons**, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- The data needs to be processed for **archiving purposes**, scientific or historical research purposes, or statistical purposes, and the processing is in the public interest

For criminal offence data, we will meet both a lawful basis and a condition set out under data protection law. Conditions include:

- The individual (or their parent/carer when appropriate in the case of a pupil) has given **consent**
- The data needs to be processed to ensure the **vital interests** of the individual or another person, where the individual is physically or legally incapable of giving consent
- The data has already been made **manifestly public** by the individual
- The data needs to be processed for or in connection with legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of **legal rights**
- The data needs to be processed for reasons of **substantial public interest** as defined in legislation

Whenever we first collect personal data directly from individuals, we will provide them with the relevant information required by data protection law.

We will always consider the fairness of our data processing. We will ensure we do not handle personal data in ways that individuals would not reasonably expect, or use personal data in ways which have unjustified adverse effects on them.

## 7.2 Limitation, minimisation and accuracy

We will only collect personal data for specified, explicit and legitimate reasons. We will explain these reasons to the individuals when we first collect their data.

If we want to use personal data for reasons other than those given when we first obtained it, we will inform the individuals concerned before we do so, and seek consent where necessary.

Staff must only process personal data where it is necessary in order to do their jobs.

We will keep data accurate and, where necessary, up-to-date. Inaccurate data will be rectified or erased when appropriate.

In addition, when staff no longer need the personal data they hold, they must ensure it is deleted or anonymised. This will be done in accordance with the school's data retention schedule (See Appendix 2).

## 8. Sharing personal data

We will not normally share personal data with anyone else without consent, but there are certain circumstances where we may be required to do so. These include, but are not limited to, situations where:

- There is an issue with a pupil or parent/carer that puts the safety of our staff at risk
- We need to liaise with other agencies – we will seek consent as necessary before doing this
- Our suppliers or contractors need data to enable us to provide services to our staff and pupils – for example, IT companies. When doing this, we will:
  - Only appoint suppliers or contractors which can provide sufficient guarantees that they comply with UK data protection law
  - Establish a contract with the supplier or contractor to ensure the fair and lawful processing of any personal data we share
  - Only share data that the supplier or contractor needs to carry out their service

We will also share personal data with law enforcement and government bodies where we are legally required to do so.

We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

Where we transfer personal data internationally, we will do so in accordance with UK data protection law.

## **9. Subject access requests and other rights of individuals**

### **9.1 Subject access requests**

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them. This includes:

- Confirmation that their personal data is being processed
- Access to a copy of the data
- The purposes of the data processing
- The categories of personal data concerned
- Who the data has been, or will be, shared with
- How long the data will be stored for, or if this is not possible, the criteria used to determine this period
- Where relevant, the existence of the right to request rectification, erasure or restriction, or to object to such processing
- The right to lodge a complaint with the ICO or another supervisory authority
- The source of the data, if not the individual data
- Whether any automated decision-making is being applied to their data, and what the significance and consequences of this might be for the individual
- The safeguards provided if the data is being transferred internationally

See the Subject Access Request Policy for further information.

### **9.2 Other data protection rights of the individual**

In addition to the right to make a subject access request (see above), and to receive information when we are collecting their data about how we use and process it, individuals also have the right to:

- Withdraw their consent to processing at any time
- Ask us to rectify, erase or restrict processing of their personal data (in certain circumstances)
- Prevent use of their personal data for direct marketing
- Object to processing which has been justified on the basis of public interest, official authority or legitimate interests
- Challenge decisions based solely on automated decision making or profiling (i.e. making decisions or evaluating certain things about an individual based on their personal data with no human involvement)
- Be notified of a data breach (in certain circumstances)
- Make a complaint to the ICO
- Ask for their personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances)

Individuals should submit any request to exercise these rights to the PCO. If staff receive such a request, they must immediately forward it to the PCO. See associated Subject Rights Request Policy.

## **10. CCTV**

We use CCTV in various locations outside of the School site to ensure it remains safe. We will adhere to the ICO's [code of practice](#) for the use of CCTV.

We do not need to ask individuals' permission to use CCTV. Security cameras are clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Any enquiries about the CCTV system should be directed to the PCO.

## **11. Photographs and videos**

As part of our school activities, we may take photographs and record images of individuals within our school. We will obtain written consent from parents/carers, or pupils aged 18 and over, for photographs and videos to be taken of pupils for communication, marketing and promotional materials. We will clearly explain how the photograph and/or video will be used to both the parent/carer and pupil. Where we do not need parental consent, we will clearly explain to the pupil how the photograph and/or video will be used. Any photographs and videos taken by parents/carers at school events for their own personal use are not covered by data protection legislation. However, we will ask that photos or videos with other pupils are not shared publicly on social media for safeguarding reasons, unless all the relevant parents/carers (or pupils where appropriate) have agreed to this.

Where the school takes photographs and videos, uses may include:

- Within school on notice boards and in school magazines, brochures, newsletters, etc.
- Outside of school by external agencies such as the school photographer, newspapers, campaigns
- Online on our school website or social media pages

Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the photograph or video and not distribute it further.

When using photographs and videos in this way we will not accompany them with the student's full name, to ensure they cannot be identified. See associated Photography and Videos at School Policy.

## **12. Data protection by design and default**

We will put measures in place to show that we have integrated data protection into all of our data processing activities, including:

- Appointing a suitably qualified PCO, and ensuring they have the necessary resources to fulfil their duties and maintain their expert knowledge
- Only processing personal data that is necessary for each specific purpose of processing, and always in line with the data protection principles set out in relevant data protection law (see section 6)
- Completing data protection impact assessments where the school's processing of personal data presents a high risk to rights and freedoms of individuals, and when introducing new technologies (the PCO will advise on this process)
- Integrating data protection into internal documents including this policy, any related policies and privacy notices
- Regularly training members of staff on data protection law, this policy, any related policies and any other data protection matters; we will also keep a record of attendance
- Regularly conducting reviews and audits to test our privacy measures and make sure we are compliant
- Appropriate safeguards being put in place if we transfer any personal data outside of the UK, where different data protection laws may apply
- Maintaining records of our processing activities, including:

- (i) For the benefit of data subjects, making available the name and contact details of our school and PCO and all information we are required to share about how we use and process their personal data (via our privacy notices)
- (ii) For all personal data that we hold, maintaining an internal record of the type of data, type of data subject, how and why we are using the data, any third-party recipients, any transfers outside of the UK and the safeguards for those, retention periods and how we are keeping the data secure

### **13. Data security and storage of records**

We will protect personal data and keep it safe from unauthorised or unlawful access, alteration, processing or disclosure, and against accidental or unlawful loss, destruction or damage.

In particular:

- Paper-based records and portable electronic devices, such as laptops and hard drives that contain personal data, are kept under lock and key when not in use
- Access to network storage is strictly controlled via Active Directory Group Policies. Access to database systems are fully role based controlled.
- Password protection is in place for computers; meeting a minimum length and complexity standard. All staff passwords have a six month time limit before needing to be changed.
- USB ports are locked down to prevent data being taken out of the School without permission.
- BitLocker is installed for the encryption of USB sticks where data transfer is required. There is no local storage of data on laptops and all iPads / mobile devices are encrypted.
- Staff are reminded of the need to check email addresses when creating messages and, potentially, sharing confidential data.
- Safeguarding communications are carried out on an encrypted platform (CPOMS). Other data base transfers of sensitive data are via encrypted platforms.
- All incoming emails are intercepted by MailMarshal software and checked for virus threat, phishing and scams. A hold and release mechanism is in place.
- All staff have organisation issued email addresses. For Governors, access to digital information is via Role Based access control. Sensitive documents are not emailed.
- Printing to copiers is PIN number controlled. Secure Print Box is available on multiple print devices. All print jobs are managed and logged by PaperCut Print Management Software.
- Papers containing confidential personal data must not be left on office and classroom desks, on staffroom tables, or left anywhere else where there is general access.
- Where personal information needs to be taken off site, staff must sign it in and out from the school office.

### **14. Disposal of records**

Personal data that is no longer needed will be disposed of securely. Personal data that has become inaccurate or out of date will also be disposed of securely, where we cannot or do not need to rectify or update it.

For example, we will shred or incinerate paper-based records, and overwrite or delete electronic files. We may also use a third party to safely dispose of records on the School's behalf. If we do so, we will require the third party to provide sufficient guarantees that it complies with data protection law. See Appendix 2 for further information and associated justifications.

### **15. Personal data breaches**

The School will make all reasonable endeavours to ensure that there are no personal data breaches. In the unlikely event of a suspected data breach, we will follow the procedure set out in the Data Security Incident Policy.

When appropriate, we will report the data breach to the ICO within 72 hours after becoming aware of it. Such breaches in a school context may include, but are not limited to:

- Safeguarding information being made available to an unauthorised person
- The theft of a school laptop containing non-encrypted personal data about pupils

## **16. Training**

All staff and governors are provided with data protection training as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation, guidance or the School's processes make it necessary. Annual reminders of principles will take place in annual INSET meetings for staff.

## **17. Monitoring arrangements**

The PCO is responsible for monitoring and reviewing this policy.

This policy will be reviewed every three years and approved by the full Governing Board.

## **18. Links with other policies**

**This Data protection Policy is linked to:**

- Archive Policy
- Child Protection and Safeguarding Policy
- Data Security Incident Policy
- ICT & E-Safety Policy
- Photography and Videos at School Policy
- Subject Access Request Policy
- Subject Rights Request Policy

**Reviewed and Approved by the Full Governing Body June 2021**

**Further reviewed by the Head Mistress and Ellis Whittam September 2021**

**Reviewed and Approved by the Academic Development Committee October 2021**

**Reviewed by the Head Mistress, December 2022**

**Reviewed and Approved by the Academic Development Committee January 2023**



## **Appendix I – Privacy Notices**

### **Parents (or guardians) of children at Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447) or applying to join the School**

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the School and the School will therefore have a “legitimate interest” for processing basic personal data and sensitive personal data. We see the provision of personal data as necessary to properly admit your child to the School and to administer, and for the School to fulfil its obligations under the contract once your child is a pupil here. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

The School will share your data with the following companies who have contracts with the School and who have equalled the School’s precautions and systems for dealing with data, these are:

- Catering
- Photographer
- IT Contractor
- IT software provider

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

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

### **Your rights**

**You have the following rights when it comes to the processing of your data. You can:**

- Ask for more information about the collection and processing of your personal data
- Access the personal data and supplementary information held about you
- Have your personal data rectified by the data controller if the personal data you have provided is inaccurate or incomplete
- Restrict a data controller from processing your data if you consider it is unlawful or the data is inaccurate
- Object to your personal data being processed for direct marketing, scientific or historical research
- Obtain the data and reuse it.

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.

Our Privacy and Compliancy Officer (PCO) is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

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 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 within a month.

There is no automated decision making or profiling involved in this data stream into and through the School.

## **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]

## Children over the age of 13 who attend Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447)

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.

It is not necessary for data to be shared with other countries, except for international trips that the School organises. Should this be envisaged, parents of students will be contacted for consent which will be limited in time and content if it be required.

There is no automated decision making or profiling involved in this data stream into and through the School.

Our Privacy and Compliance Officer (PCO) is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

## **Employees of Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447)**

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

Data will be processed for the purposes of responding to requests for information about joining the School and the School will therefore have a "legitimate interest" for processing basic personal data and sensitive personal data. The data the School holds will be the minimum it requires to form and maintain the contract between you and the School.

### **The personal data we hold**

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- > Name
- > Address
- > Date of birth
- > Contact details and those of next of kin
- > Marital status and gender
- > Salary, annual leave, pension, allowances, awards and benefits information
- > Bank account details, payroll records, student / postgraduate loan information, National Insurance number and tax status information
- > Data regarding partners in cases of Shared Parental Leave/Pay
- > Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- > Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- > Performance information
- > Any accidents connected with work
- > Outcomes of any disciplinary and/or grievance procedures

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- > Any health conditions you have that we need to be aware of
- > Sickness records
- > Photographs and CCTV images captured in school. This includes Driving Licences for those attending MIDAS minibus training

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

### **Why we use this data**

We use the data listed above to:

- a) Enable you to be paid
- b) Facilitate safe recruitment, as part of our safeguarding obligations towards pupils

- c) Support effective performance management
- d) Inform our recruitment and retention policies
- e) Allow better financial modelling and planning
- f) Enable equalities monitoring
- g) Improve the management of workforce data across the sector
- h) Support the work of the School Teachers' Review Body

### **Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

### **Who we share your data with**

The School will share relevant data with the following companies who have contracts with the School and who have equalled the School's precautions and systems for dealing with data, these may include:

- Health care service provider
- Caterers
- IT Contractor
- IT software provider
- DBS Clearance provider

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

### **Your rights**

**You have the following rights when it comes to the processing of your data. You can:**

- Ask for more information about the collection and processing of your personal data
- Access the personal data and supplementary information held about you
- Have your personal data rectified by the data controller if the personal data you have provided is inaccurate or incomplete
- Restrict a data controller from processing your data if you consider it is unlawful or the data is inaccurate
- Object to your personal data being processed for direct marketing, scientific or historical research
- Obtain the data and reuse it.

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.

### **How long we retain your data**

Employee data i.e. personal information (name, dates of employment, role etc.) are kept on a Single Central Register of Appointments for 85 years after staff have left, but all other records (including salary records) will be kept for a minimum of 6 years after staff have left. Employee data will be kept on the School Archive 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.

Our Privacy and Compliancy Officer (PCO) is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

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 within a month.

There is no automated decision making or profiling involved in this data stream into and through the School.



## **Governors of Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447)**

This privacy notice will be provided to you at the time your data is being obtained, if it is being obtained directly.

### **The personal data we hold**

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests

We may also collect, store and use information about you that falls into “special categories” of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements

The School will share your data with the following companies who have contracts with the School and who have equalled the School’s precautions, systems and procedures for dealing with data, these are:

- IT Contractor
- IT software provider
- Companies House
- Charities Commission
- AGBIS

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.

### **Why we use this data**

Data will be processed for the purposes of responding to requests for information about joining the Board of Governors of the School and the School will therefore have a “legitimate interest” for processing basic personal data and, if necessary, sensitive personal data. The data the School holds will be the minimum it requires.

The purpose of processing this data is to help us to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing governors’/trustees’ details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require them

### **Our legal basis for using this data**

We only collect and use personal information about you when the law allows us to. However, we see the provision of personal data as necessary to safeguard you and the School as it will allow necessary checks to be made.

Most commonly, we use your personal information where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)
- We have legitimate interests in processing the data

We will obtain the data the School requires from you, should we need data from other sources we will contact you first.

The retention period for data on Governors to be held will be 25 years.

## **Your rights**

**You have the following rights when it comes to the processing of your data. You can:**

- Ask for more information about the collection and processing of your personal data
- Access the personal data and supplementary information held about you
- Have your personal data rectified by the data controller if the personal data you have provided is inaccurate or incomplete
- Restrict a data controller from processing your data if you consider it is unlawful or the data is inaccurate
- Object to your personal data being processed for direct marketing, scientific or historical research
- Obtain the data and reuse it

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.

There is no automated decision making or profiling involved in this data stream into and through the School.

Our Privacy and Compliancy Officer (PCO) is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

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.**

## **Development Team at Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447)**

### **The Aims of this Privacy Statement**

Our alumnae, supporters and friends of the School are extremely important to us and this Privacy Statement explains how the Development Team collects, stores, manages and protects your personal information.

It outlines the types of personal information that we hold and how we use this to provide services to our alumnae, supporters and friends of the School.

The Development Office is part of the School which means that the School is ultimately responsible for how the Development Office use your information.

### **Who we are and what we do**

The Development Team supports Manchester High School for Girls through the creation of meaningful relationships with alumnae, pupils, parents (both current and former) and supporters of the School. We do this by offering a range of educational, social and networking events, publications and careers advice for current and recent pupils. We also fundraise to support the School's bursary fund and capital projects.

We will keep your details up to date and will conduct checks to make sure the details we have for you are current and, where appropriate, update them. As a result, we may obtain information about you from publically available sources such as the BT telephone directory, Royal Mail (when something is sent back to us because it was not delivered) and LinkedIn.

We are very proud of the relationships we have with our alumnae, supporters and friends of the School and we use your personal information to ensure we contact you in the most appropriate way, improve our offering and to ensure we work efficiently and effectively.

The Development Team is one part of Manchester High School for Girls. For full details on how the School use the information of pupils and parents more widely and the School's privacy notices, please contact the Director of Finance & Operations either by phone (0161 224 0447) or email ([administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)).

### **The personal information we hold about you and from where this is obtained**

The Development Team has a separate database from the other departments at the School. Our database contains personal information collected by the School during the course of our relationship with pupils, alumnae, parents, supporters and friends. Initially, information about pupils is transferred into our database from the pupil record system. We can only access information about you held by the other School departments where this is relevant to our work.

The vast majority of information that we hold is obtained directly from you, for example information we obtain through your participation in the School community, events and activities.

However, where this information might be obtained from another source we have indicated this in the table below.

| <b>Personal Information</b>                                                                                                                                       | <b>Where we get this information from if not from you</b>                                                                                                                                    |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Name, title, gender and date of birth                                                                                                                             | If you were a pupil at the School your parents may have provided this information.                                                                                                           |
| Contact details including postal address, email address, phone number and links to social media accounts                                                          | N/A                                                                                                                                                                                          |
| Information about your time at the School and other academic institutions                                                                                         | From other departments at the School.<br>Occasionally from other members of the alumnae and supporters community.<br>Occasionally from professional social media networks, such as LinkedIn. |
| Information on your occupation and professional interests                                                                                                         | Occasionally from other members of the alumnae and supporters community.<br>Occasionally from professional social media networks, such as LinkedIn.                                          |
| Information on your recreations and interests                                                                                                                     | Occasionally from other members of the alumnae and supporters community.<br>Occasionally from social media networks, such as LinkedIn and Facebook.                                          |
| Family and spouse/partner details and your relationship to other members of the alumnae and supporters community                                                  | From other members of the alumnae and supporters community. Occasionally from social media networks such as LinkedIn and Facebook.                                                           |
| Records of donations and Gift Aid status, where applicable (required by HMRC)                                                                                     | N/A                                                                                                                                                                                          |
| Bank details for the purposes of processing donations or payments to the School                                                                                   | N/A                                                                                                                                                                                          |
| Your communication preferences                                                                                                                                    | N/A                                                                                                                                                                                          |
| Volunteering you have undertaken on behalf of the School                                                                                                          | From other departments at the School.                                                                                                                                                        |
| Media articles relating to you                                                                                                                                    | From media sources such as Google alerts (set to Manchester High School for Girls), newspaper and magazine articles, television and radio reports.                                           |
| Information on your engagement in School events, groups or networks and photographs taken on such occasions                                                       | Through your participation at these events.                                                                                                                                                  |
| Personal information provided for a specific purpose (for example, disability access requirements, catering preferences or lifestyle status for event management) | N/A                                                                                                                                                                                          |

## **How we use your personal information**

Your personal information is used by the Development Team for a number of interdependent purposes, including alumnae relations, communications and fundraising.

These include the following communication and marketing activities which may be sent by mail, email, telephone and social media, depending on the communication preferences you have expressed to us:

- publications, including, but not limited to, the School magazine, *High Flyer*
- MHSG news updates
- notification of events for alumnae, supporters and friends of the School, including, but not limited to, reunions, supper clubs and talks from distinguished speakers
- fundraising programmes; appeals and requests for donations
- requests for assistance with pupil mentoring schemes and the School's 'Futures' programme
- promotion of discounts and other services available to alumnae, supporters and friends of the School
- we may ask you for some feedback in order that we can continue to improve our relationship building work

We may use tools to help us improve the effectiveness of our communications with you, such as tracking the emails we send to see if they have been opened and which links within a message are clicked. We monitor website visits and use tools such as Google Analytics to improve our website and services.

We may have to carry out due diligence regarding any generous donations which you make to the School. This may involve obtaining your personal information from sources such as 192.com, the Charity Commission, Zoopla, Business Week and related media articles. This is to comply with our legal obligations.

### **Sharing your personal information with third parties**

From time to time, we do facilitate communication between individual members of the alumnae community but we never release personal contact details without your prior permission.

The School may use third-party partners to support our activities which described above. For example:

- If you interact with the School through a third party (for example, supporting the School via the CAF Donate giving platform) then we may obtain information about you from that third party, for example, for Gift Aid purposes
- Third parties that the Development Team work with include, but are not limited to, event booking platforms such as Eventbrite and Fatsoma, and SurveyMonkey. We may also use third parties to process payments or to host our database.
- Personal information obtained in this way is treated no differently to any other information once held by the Development Team

We will never sell your personal details to a third party.

### **Sending information to other countries**

We may communicate with you when you are overseas (for example, if you live in a different country).

The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: [http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index\\_en.htm](http://ec.europa.eu/justice/data-protection/internationaltransfers/adequacy/index_en.htm)

If the country that we are sending your information to is not on the list or is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, in the absence of any other

safeguards, there might not be the same level of protection for your personal information as there is in the UK. We will abide by UK GDPR regulations in this regard.

## **Our legal grounds for using your information**

This section contains information about the legal basis that we are relying on when handling your information.

### Consent

In many cases, we are processing your personal information because you have given your consent to this.

### Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you.

Specifically, we have a legitimate interest in:

- using your information to administer our events;
- safeguarding and promoting the welfare of our pupils with whom you may be in contact e.g. if you are providing work experience or mentoring;
- promoting the objects and interests of the School. This includes fundraising e.g. if we want to raise money for the bursary fund or new buildings;
- facilitating the efficient operation of the Development Team;
- ensuring that we comply with our legal obligations.

In addition, your personal information may be shared for the legitimate interests of others. For example, an event host may need your contact details.

If you object to us using your information where we are relying on our legitimate interests as explained above please speak to the Development Team using the contact details below.

### **Legal obligation**

Occasionally, the Development Team may need to use your information in order to comply with a legal obligation. For example, we may need to keep a record of who will be attending an event so that we can comply with our health and safety obligations.

### **Vital interests**

This ground would apply if we need to use your information to prevent you or someone else from being seriously harmed or killed.

## **For how long do we keep your information?**

The Development Team will keep information about you for as long as we need to do so, in compliance with our data protection and other legal obligations. For example, we will need to retain contact details for you for so long as you want to be part of the school community so that we can communicate with you. The Development Team may also need to keep a record if you tell us that you do not want to hear from us anymore, so that we do not inadvertently add you to our mailing list in future.

We may keep information about you for a very long time or even indefinitely if we need this for historical, research or statistical purposes. For example, if we consider the information might be useful if someone wanted to write a book about the School.

The School may also keep information for a long time as part of its wider legal and regulatory obligations, even if that information is no longer needed by the Development Team. This is especially relevant to former staff, pupils and parents. For more information on how personal information is used by the School outside of the Development Team please contact the Director of Finance & Operations either by phone (0161 224 0447) or email ([administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)).

## **Your rights and decisions which you can make about your information**

The Development Team considers its relationships with alumnae, supporters and friends of the School to be lifelong but at any point you can of course contact us to update your communication preferences or say you no longer wish to hear from us.

We will always try to ensure that the information we hold on you is up to date, reasonable and not excessive. You can change your communication preferences at any time.

If you choose to opt out of all future communications, or exercise your right to be forgotten, we will continue to maintain a core set of personal information (name, attended to and from dates and date of birth) to ensure we do not contact you inadvertently in the future, while still maintaining a record of your academic achievements.

We may also need to retain some financial records about you for statutory purposes (for example, Gift Aid, anti-fraud and accounting matters).

From May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- if information is incorrect you can ask us to correct it
- you can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people we have sent it to
- you can ask us to delete the information that we hold about you in certain circumstances. For example, where we no longer need the information
- you can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we can only use it for limited purposes while we check its accuracy

The School's Director of Finance & Operations can give you more information about your data protection rights. Our Privacy and Compliancy Officer (PCO) is Ms Liz Smith and is contactable via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

## **Questions**

If you have any questions about this privacy statement, please contact us:

Development Team  
Manchester High School for Girls  
Grangethorpe Road

Manchester  
M14 6HS

[development@mhsg.manchester.sch.uk](mailto:development@mhsg.manchester.sch.uk)

0161 224 0447

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.**



## **Visitors and Contractors of Manchester High School for Girls (Grangethorpe Road, Manchester, M14 6HS. 0161 224 0447)**

### **Introduction**

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **visitors to the school**.

### **The personal data we hold**

Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Name
- Contact details
- Information relating to the visit, e.g. company or organisation name, arrival and departure time, car number plate

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured outside of our school

We may also hold data about you that we have received from other organisations, including other schools and social services. This data is provided to us by you when you contact us in advance of your visit to the School or upon your visit to the School. However, we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

### **Why we use this data**

We use the data listed above for the following legitimate interests, and – with respect to health and safety, legal interests - to:

- a) Identify you and keep you safe while on the school site
- b) Keep pupils and staff safe
- c) Maintain accurate records of visits to the school
- d) Provide appropriate access arrangements

### **Use of your personal data for marketing purposes**

Where you have given us consent to do so, we may send you marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

## **Use of your personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

## **Collecting this data**

While the majority of information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

## **How we store this data**

We keep personal information about you while you are visiting our school. These records are stored for six months although contact details for contractors may be kept by relevant staff for longer in order to fulfil contractual obligations.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

## **Who we share data with**

We do not share information about you with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies
- Our regulator, [Independent Schools Inspectorate]
- Suppliers and service providers such as caterers
- Our auditors
- Survey and research organisations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals

## **Transferring data internationally**

We may share personal information about you with the following international third parties, where different data protection legislation applies:

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

## **Your rights**

### **How to access personal information that we hold about you**

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

### **Your other rights regarding your data**

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

## **Complaints**

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113

- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Privacy and Compliance Officer**:

- Ms Liz Smith via [administration@mhsg.manchester.sch.uk](mailto:administration@mhsg.manchester.sch.uk)

## **Archive Privacy Notice**

### **The aims of this privacy notice**

The Manchester High School Archive holds a comprehensive collection of records, documents and artefacts which chart the history of the School from its foundation to the present day. The collection is an important source of information for authors and academics interested in the history of girls' education in general, as well as biographical information on celebrated members of the school community. It is regularly consulted by families for the purposes of genealogical research. This privacy notice explains how personal data is stored in the archive and how it may be used and shared.

### **Legal grounds for retaining and using your information**

The General Data Protection Regulation (GDPR) and the Data Protection Act 2018 allow for 'archiving in the public interest'.

The activities that form 'archiving in the public interest' are described in the GDPR at Recital 158:

*'Public authorities or public or private bodies that hold records of public interest should be services which, pursuant to Union or Member State law, have a legal obligation to acquire, preserve, appraise, arrange, describe, communicate, promote, disseminate and provide access to records of enduring value for general public interest'*

Article 5 of Recital 158 clarifies that 'personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89 (i)'

The purpose of archiving is primarily to maintain information for use over the very long-term when the potential for impact on individuals is low or non-existent.

### **How we use and share information**

#### **General principles**

- The archive is accessed only by the archivists, the Head Mistress or the Head Mistress's PA.
- Information relating to deceased persons is not covered by the GDPR or the Data Protection Act 2018.
- All files on former students or staff are closed until their death (or 100 years from their date of birth). After this time, direct access is still restricted to the archivists, but relevant information may be extracted by the archivists to support researchers. Due consideration is always given to the sensitivities of relatives of the data subject.
- The files of data subjects who are still alive are closed, but may be retrieved for the Head's PA if the data subject gives signed permission, e.g. for confirmation of attendance or examination results of former pupils, or dates of service of former members of staff.
- Pupil files are archived typically 2 years after the date of leaving.
- Staff files are archived typically 2 years after the date of leaving.
- This Privacy Notice should be read in conjunction with the School's Privacy Notices which may be found on the School website: <https://www.manchesterhigh.co.uk/about/privacy-policy>

| <b>Information Asset</b>                              | <b>Retention Period</b> | <b>Access</b>                                                                                                                                                                                       |
|-------------------------------------------------------|-------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Pupil files                                           | Permanent               | Closed until death or 100 years after date of birth unless signed permission is given by the data subject to retrieve information. Accessed only by the archivists, the Head Mistress or Head's PA. |
| Pupil database – alphabetical list of all MHSG pupils | Permanent               | Accessed only by the archivists. Information about pupils is transferred into the archive database from School records.                                                                             |
| Staff files                                           | Permanent               | Closed until death or 100 years after date of birth unless signed permission is given by the data subject                                                                                           |

|                                                                                                      |           |                                                                                                                                                                                                                                                                                                                                                                              |
|------------------------------------------------------------------------------------------------------|-----------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
|                                                                                                      |           | to retrieve information. Accessed only by the archivists, the Head Mistress or the Head's PA.                                                                                                                                                                                                                                                                                |
| Staff list – alphabetical list of all MHSg staff with details of positions held and dates of service | Permanent | Accessed only by the archivists. No information shared with third parties about living persons.                                                                                                                                                                                                                                                                              |
| List of governors with dates of service                                                              | Permanent | Accessed only by the archivists or Head's PA. No information shared with third parties about living persons.                                                                                                                                                                                                                                                                 |
| School reports 1874-1963 (early inspection reports)                                                  | Permanent | Accessed only by the archivists or Head's PA. No information shared with third parties about living persons.                                                                                                                                                                                                                                                                 |
| Electronic list of enquiries with names and contact details of enquirers                             | Permanent | Accessed only by the archivists. Information provided by the enquirer. No information shared about living persons without their consent.                                                                                                                                                                                                                                     |
| Archive catalogue                                                                                    | Permanent | May contain information about staff and pupils who are still alive. Accessed only by the archivists. No information shared with third parties about living persons.                                                                                                                                                                                                          |
| School photographs                                                                                   | Permanent | Accessed only by the archivists. Photographic images of pupils and staff from the archive may be used in school publications, archive exhibitions and on the school and archive websites in accordance with the school's policy on taking, storing and using images of children. No names or personal information are shared with external researchers about living persons. |
| Governors' Minutes                                                                                   | Permanent | Closed after 1981. Earlier records accessed only by archivists. No names or personal information shared with external researchers about living persons.                                                                                                                                                                                                                      |
| Exhibitions with information about living persons                                                    | Permanent | Information supplied by the data subject displayed only with their express consent.                                                                                                                                                                                                                                                                                          |

## Notes

- Personal information about living persons may be shared with other departments in school e.g. Careers, Development, but only with the express permission of the data subject.
- Information about living persons will only be sent abroad with the express consent of the data subject.
- Some archive processing activity (e.g. cataloguing) is carried out by external IT providers. This is subject to contractual assurances that personal data will be kept securely and only in accordance with the School's specific directions.
- Every effort is made to ensure that data is accurate.
- 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.
- There is no automated decision making or profiling involved handling data held in the archive.

## Appendix 2 - Data Retention

The School uses a six month 'run off' period to help ensure that a record is not deleted if it needs to be kept for longer. This means that the School keeps information for six months after the retention period set out in the table has come to an end. In addition, the School carries out a data cleanse of its files every six months. In practice therefore, a three year retention period means three and a half years plus up to six months to allow the School to securely dispose of its information.

### Information regarding disposal

When returned by staff, iPads are returned to factory settings/wiped as soon as they are returned to use, using Apple Configurator.

People issued laptops are either told how to use Foldr/OneDrive or are set up specifically to use OneDrive. There should be no data saved locally on a laptop. Any data is destroyed when the laptop is recycled as we request the hard disk to be destroyed.

| Data item group              | Justification                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 |
|------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Admissions Registers / Files | <p>Admissions data is used extensively from the period of the school receiving it up until the point where children enrol.</p> <p>It is then used for some validation and cross checking of enrolment details. Once enrolled, the child's records in the MIS become the core record.</p> <p>Data about children who registered for application but did not get in or take up a place is useful, but any intelligence gathered from it (for example, where in the city children are interested in our school, or the SEN make up) is aggregated after the first year to a level being non-personal. After that, the detailed data within the admission file is deleted. References received about such pupils who are unsuccessful in their application are destroyed within one month of parents being informed that their application is unsuccessful.</p> <p>Admissions information for students who are admitted to the School is stored in the Archive, indefinitely.</p> |
| Attainment                   | <p>Formative assessment data is useful as a child is building towards a particular more formal assessment. Once the child leaves the School, it has little value in terms of retention but is stored, on reports, as part of our school Archive, indefinitely.</p> <p>Summative attainment is the main outcome of what children 'attain' in school. It is important that future schools where pupils go on to learn can understand previous attainment. Whilst often that information is 'passed on' smoothly as children move phase, it is not always the case, and thus retaining the names alongside the main attainment is important. Such information is kept on the School database until a pupil is 25 years old.</p>                                                                                                                                                                                                                                                  |

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|                                                                         | Trend analysis is important. Whilst this must be fully flexible in reporting small sub groups, and the data would wish to be retained at an individual level, some personal data (for example, name) could be removed from the data to reduce sensitivity. Such names are removed from our computer systems after pupils reach 25 years old.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| Attendance                                                              | <p>Attendance is related to individual attainment and so being able to relate attendance to attainment whilst in our care is important. Keeping it in detailed, printed individual form for three years from the date of last entry supports conversations about detailed attendance that may be needed to best support that child. Letters authorising attendance should also be kept for three years from the date of the last entry on the attendance register. Attendance information may be stored for far longer periods if forming part of a safeguarding record or in the case of contentious dispute.</p> <p>After three years, non-identifiable summary statistics are all that is required to support longer-term trend analysis of attendance patterns.</p> <p>Individual attendance information is stored on academic reports which are kept in archive information indefinitely.</p> |
| Behaviour                                                               | <p>This is all relevant for managing children when at our school. Keeping it in detailed, individual form for six years after the pupil leaves the senior school, supports conversations as well as a period of 'handover' to a subsequent institution with conversations supported by rich data if relevant.</p> <p>Serious behaviour incidents (including those relating to Bullying and Racist incidents for instance) and the records thereof may be kept for longer for legal reasons.</p>                                                                                                                                                                                                                                                                                                                                                                                                    |
| Catering and free school meal management                                | <p>A short historic record of what a child has eaten may be useful in cases of any food-related incidents at school, or parental queries about the types of meals their children are choosing. Keeping this information for up to 2 years after the pupil has left the Senior School also allows time to do accounting work associated with catering.</p> <p>Due to the way school funding works, free school meal eligibility is a financial matter, and thus keeping this data is appropriate until the pupil reaches 25.</p>                                                                                                                                                                                                                                                                                                                                                                    |
| CCTV Footage                                                            | 90 days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| Financial Accounts, reports, annual reports and VAT records and reports | Six years from the end of the financial period to which they relate.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| Financial Information in respect of fees                                | Financial information should be kept for six years from the date of the child leaving the School.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| Governor Minutes                                                        | 10 years from the date of the meeting before being stored indefinitely in the Archive. Constitutional documents and copies of any correspondence with the Charity Commission should be kept indefinitely.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |



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| Health and Safety Records                                   | General records of health and safety auditing and monitoring, including fire risk assessments, drills, electrical testing, PAT testing and gas appliance testing, training records and copies of instructions or information should be kept for at least three years in the absence of a specific accident, incident, dangerous occurrence or notifiable disease.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| Medical information and administration                      | <p>To support any handover work about effective management of medical conditions to a subsequent institution, information relating to medical records is important.</p> <p>Permission forms that parents sign should to be retained for the period that medication is given, and for up to 2 years afterwards if no issue is raised by the child/parent. If no issue is raised in that time, that feels a reasonable window to assume all was administered satisfactorily.</p> <p>Medical notes and records which contain information on long term conditions are stored until a pupil reaches the age of 25. Counselling records are also stored until a pupil reaches the age of 25.</p> <p>Accident reports, including the first aid / accident records and RIDDOR reports, incident investigations and reports will be stored until the pupil reaches the age of 22.</p> <p>Medical ‘incidents’ that have a behavioural or safeguarding angle (including the school’s duty of care) should refer to the retention periods associated with those policies but could be kept indefinitely.</p> |
| Personal identifiers, contacts and personal characteristics | <p>Images are used for different reasons, and the reason should dictate the retention period. Images used for identification are stored in the Archive. Images used in displays etc. can be retained for educational purposes whilst the child is at the school and afterwards if consent is given for their use. Other usages of images (for example, marketing) should be retained for and used in line with the active informed consent, captured at the outset of using the photograph.</p> <p>As set out in other sections, names are needed for smooth handover to subsequent schools for up to 2 years and will also be kept in the archive, indefinitely.</p> <p>Characteristics form an essential part of trend analysis, and so retention is in line with those needs.</p> <p>Personal identifiers are stored in the Archive (see separate policy and privacy notice).</p>                                                                                                                                                                                                             |
| Safeguarding                                                | All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years and, at least for 25 years, after the pupil has left the School. The elements of a pupil file (name, address) that are needed to identify children with certainty are needed to be retained along with those records.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |

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|       | <p>Occasionally, there may be circumstances which mean that records should be kept even longer than the 25 years noted here and perhaps, indefinitely. This is the case when there is a risk of litigation or a request from an outside body such as the Independent Inquiry into Child Sexual Abuse (IICSA).</p> <p>Our insurers continue to advise us on this element of our approach to retention.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| Staff | <p>Information stored on the Single Central Register is stored indefinitely (in the light of IICSA) and staff information relating to name, subject taught and time at the School will be stored indefinitely in the Archive.</p> <p>Financial information and other personnel records such as PAYE records and maternity / paternity records, records in relation to hours worked, payments made, personnel and training records and records of travel and subsistence claims are kept on the School databases for a minimum of six years after employment ends and for records relating to the Teachers' Pension Scheme, indefinitely.</p> <p>An employee's bank details should be destroyed as soon after the end of employment as possible once last payments have been made.</p> <p>Sickness records required for the purposes of Statutory Sick Pay should be deleted three years after the end of the tax year to which they relate.</p> <p>Records relating to unsuccessful candidates should be destroyed six months after notification.</p> <p>Reportable injuries and accidents reported of employees should be kept three years from the date of record and, in the case of disease, indefinitely.</p> <p>Records of maintenance, examination and test control measures relating to substances hazardous to health under the COSHH regime should be kept for five years. Health records for licensable asbestos work and records of air monitoring for asbestos when it has resulted in requested health records should be kept for at least forty years from the date of the last entry. Records of air monitoring for asbestos, examinations, tests and repairs carried out in respect of exhaust or respiratory protective equipment under the Control of Asbestos Regulations 2012, should be kept for at least five years from the date of the last entry. Medical surveillance certificates for licensable asbestos work should be kept for at least four years from the date issued.</p> <p>Records of water monitoring, inspection, testing, checks and control measures for legionellosis should be kept for five years from the date of the last entry.</p> |

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| Trips and activities | <p>Financial information related to trips should be retained for audit purposes, for seven years. This would include enough child identifiers to be able to confirm contributions.</p> <p>A 'field file' is the information that is taken on a trip by a school. This information, if including personal data – rather than anonymised data - will be destroyed six years after the conclusion of the trip. If there is a minor medical incident on the trip (for example, a medical incident dealt with by staff in the way it would be dealt with 'within school'), then adding it into the core system would be done.</p> <p>If there is a major incident (for example, a medical incident that needed outside agency) then retaining the entire file until time that the youngest child becomes 25 would be appropriate. Insurance reasons might mean that such information is kept indefinitely. The permission slips for all pupils on the trip may need to be retained to show that the rules had been followed for all pupils.</p> <p>Schools sometimes share personal data with people providing 'educational visits' into school. There should be good policies in place to ensure that the sharing is proportionate and appropriately deleted afterwards.</p> |
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