

## **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>

	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.

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.

	<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>

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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