



Manchester High School for Girls

Privacy Notice

Archive

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>

Information Asset	Retention Period	Access
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 1 - Data Retention

Data item group	Short term need (event +1)	Medium term need (pupil at .)	Long term need (pupil at school and until 25 years old)	Very long term need (until pupil is aged 25 or older)	Justification
Admissions		X	X	X	<p>Admissions files</p> <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</p>

Attainment			X	X	<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>
Attendance	X	X	X	X	<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, individual form for two years after the pupil leaves the senior school supports conversations about detailed attendance that may be needed to best support that child. Attendance information may be stored for far longer periods if forming</p>

Behaviour		X	X	X	<p>This is all relevant for managing children when at our school. Keeping it in detailed, individual form for two 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</p>
Catering and free school meal management		X (meal administration)	X (free school meal eligibility information)		<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>

Trips and activities		X (educational visitors into	X (financial information related to trips)	X (major medical events)	<p>Financial information related to trips should be retained for audit purposes. 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 after two years. 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</p>
Medical information and administration		X	X (medical conditions and ongoing management)	X medical incidents (potentially)	<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 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. Adding this policy to the permission slip would seem prudent.</p> <p>Medical notes which</p>

Safeguarding				X	All data on the safeguarding file potentially forms part of an important story that may be needed retrospectively for many years. The elements of a pupil file (name, address)
Personal identifiers, contacts and personal characteristics		X (images used in displays in school) X (images used in identity systems)	X (postcodes) X (names) X (characteristics)	X	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. As set out in other sections, names are needed for smooth
Staff				X	Information stored on the Single Central Register is stored for 85 years and staff information relating to name, subject taught and time at the School will be stored indefinitely in the Archive.

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) 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]