

Privacy Notice – Pupils & Parents



Manchester
Hospital School

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Introduction

The school must process the personal data of our pupils and their families to fulfil our statutory and operational duties as an education provider.

As part of our obligations under the UK General Data Protection Regulation (UK-GDPR) we must inform you what personal data we collect about you and your child, why we need it and how it is used and managed. This information is provided in the following privacy notice.

Data Controller

The school is the 'Data Controller' for the personal information that we process about you. This means that we are responsible for your data and make decisions on how it is used.

Data Protection Officer

The school has appointed a Data Protection Officer (DPO) who is responsible for overseeing compliance with the relevant data protection legislation. Our DPO provides support to the school and acts as the first point of contact for any questions or queries regarding data protection.

Our DPO is Miss Danielle Eadie from RADCaT Ltd who is supported by the senior leadership team at the school. The DPO is contactable via the school office in the first instance.

The categories of pupil information that we process:

Record Type:	Data:
Personal Identifiers (general information held on the pupil profile)	<ul style="list-style-type: none">- Full Name- Date of Birth- UPN- Parent / Guardian Full Names- Home Address- Contact Details- Emergency Contact Details- Image (identification)- Siblings at School
Special Characteristics	<ul style="list-style-type: none">- Gender

	<ul style="list-style-type: none"> - Ethnicity - Religion - Language (if English is not the child's first spoken language) - Benefit Entitlement (Pupil Premium, Free School Meals, Nursery Funding etc)
Educational Records	<ul style="list-style-type: none"> - Assessment - Pupil Progress - Reports for Parents & School - Work Books & Sheets
Pastoral Records	<ul style="list-style-type: none"> - Attendance - Behaviour - Safeguarding & Child Protection
Health Records	<ul style="list-style-type: none"> - Allergies & Dietary Requirements - Accidents & Injuries - Medication - Special Educational Needs - Health & Wellbeing
Operational Records	<ul style="list-style-type: none"> - Free & Paid School Meals - School Trips - School Clubs - Images (CCTV) - Images (Promotional, social media etc) - System & Internet Usage Logs

Please note that this list is not exhaustive, please contact us if you would like to obtain a full list of data processed.

Why we collect and use pupil information.

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to safeguard pupils
- c) to monitor and report on pupil attainment progress.
- d) to provide appropriate pastoral care
- e) to assess the quality of our services
- f) to maintain and promote the health and wellbeing of children and others in our care
- g) to meet the statutory duties placed upon us for DfE data collections.
- h) to advise of any curriculum related activities we undertake or encourage you to attend, by newsletter or email.
- i) to promote the school and provide an insight into school life.

The lawful basis for processing personal data

Under the UK-GDPR, we must have a lawful basis to process personal data; personal data is any data that can identify a living individual. The school rely on the following lawful bases when we process personal data relating to pupils:

1. The school must process personal data to meet a **legal obligation** namely;

Category	Law	Purpose for Processing
Admissions	School Admissions Code (2014)	Administer admissions & appeals process
Education	Children’s Act (1989)	Submission of data for research
	Education Act (1996)	Submission of census data to Local Authority & DfE.
	Education Act (2005) Education & Inspections Act (2006) Education & Skills Act (2008) Childcare Act (2006)	School improvement & accountability (Ofsted)
	Education Regulations (2002)	Effective management of school
	Education (Information about Individual Pupils, England) Regulations 2013)	School funding and attainment monitoring
Equalities	Equality Act (2010)	Protect individuals by preventing discrimination
Health & Safety	Health & Safety at Word Act (1974)	Providing a safe & secure environment
Safeguarding	Safeguarding Act (2006)	Safeguarding of Children
	Keeping Children Safe in Education (2025)	
	Working Together to Safeguard Children (2018)	
SEND	Children & Families Act (2014) – Special Educational Needs & Disability Code of Practice (2014)	Provide support & pastoral care

***Please contact the school office if further information is required about our legal obligations.**

2. Personal data is processed in the performance of a **public task** for example:

- Sharing data with the local authority and DfE to support educational based decision making and funding in the UK.
- The use of CCTV to create a secure environment and to aid in crime prevention and detection.
- Data is processed in the act of providing a full-time education to pupils.

- Retaining an image of pupils for identification purposes.
3. The school has a **contractual obligation** to process personal data for instance when taking payment from parents for school meals and trips.
 4. The school has a **legitimate interest** to process personal data when providing educational resources and services to pupils. Such activities are not part of the statutory curriculum but complement the pupil's education, examples include access to classroom resources and learning apps.
 5. As parent / carers, you have provided your **consent** for us to process your own child's personal data; consent will typically be reserved for the use of images to promote the school and celebrate achievements. Pupils and parents will be issued with consent forms for any optional data processing.
 6. The school must process personal data in the act of protecting or saving someone's life; there is a **vital interest**. This lawful basis will typically apply in situations where we must share details with emergency services and first aiders if an incident or accident has occurred.

Special category data

Special category data is information that we process that is much more sensitive in nature such as details about health and wellbeing and characteristics including gender, ethnicity and religion. The school must take extra measures to ensure such information is secure and confidential, therefore we must meet an additional lawful basis from the UK-GDPR.

When processing special categories of personal data in the routine running of the school, we rely upon the following conditions:

1. As a parent / carer, you have provided your **explicit consent** (written) to make a referral to an outside agency for support with their child's health and wellbeing; this will typically involve the sharing of pupil records containing special category data.
2. Personal data is processed for reasons of **substantial public interest** including:
 - Sharing special categories of personal data about pupils with the government to meet our legal and statutory obligations; submitting census data to the DfE for instance.
 - Collecting special categories of personal data for equal opportunities monitoring to ensure all of our pupils receive equal treatment.
 - Referring serious safeguarding concerns about a pupil's health and wellbeing to the police and social services; situations where parental consent is not appropriate.
3. The school must process special category data in the act of protecting or saving someone's life; there is a **vital interest**. We have a duty to inform emergency services of any known allergies, medical conditions and religious preferences if an accident occurs.

In certain circumstances, the school may be required to process personal data (including special category) for the following reasons:

- If the school is involved in a legal claim that involves you or your child; in such instances, we are processing personal data as part of or in defence of **legal claims and other judicial acts**.
- The school may be instructed to partake in public vaccination programs and health monitoring in situations where there is a threat to health such as a pandemic. In such instances, our lawful basis to process pupil health records is for **reasons of public interest in the area of public health**.

Consent & Children

A child's personal data belongs to them and not their parent or guardian. However, we understand that some children in our school are perhaps too young or have vulnerabilities that impact their ability to understand and make decisions about their own data. In such situations, we will therefore seek any consent directly from the parent or guardian.

Where consent is the lawful basis relied upon for the processing of personal data, you have the right to withdraw your consent or change your preferences at any time by contacting the school office.

CCTV

Closed Circuit Television is in place around the school site (internally & externally) to maintain security and for the purposes of crime prevention & detection. The school will review incidents of any inappropriate behaviour by pupils where necessary.

Access to the school CCTV system is strictly limited to a select few staff; the school do not monitor the system and only review footage if we are notified of an incident. Please contact the school office for a copy of our CCTV Policy for further information about how we use CCTV.

Monitoring – Internet Use & Digital Systems

Safeguarding laws encourage schools to monitor the internet usage of our pupils to ensure that they are safe online. The school has a software that notifies the relevant staff member(s) in the event that your child visits a prohibited website or searches for an inappropriate term. Usage data and notifications from this software will be used to investigate any instances of inappropriate use in line with our behaviour policies.

Artificial Intelligence (AI)

From time to time, the school may utilise software that incorporates AI to support staff with certain processes or help your child with their development. As a rule of thumb, the school will ensure that any data processed by AI is anonymised and that human intervention is applied to any decision making; we will also ensure that no school data is used to train AI systems.

Collecting pupil information

The nature of our school means that we collect and receive personal data about our pupils and their families from a number of different sources. The source of the information will usually depend upon which of our schools the pupil will enrol at and the nature of their admission.

In most cases, pupil data will be received as a result of a referral from one or more of the following parties:

- The pupils current school
- The department for education (national pupil database)
- The local authority in which the pupil resides
- The NHS (in respect of our hospital based schools)

Any further information will likely be sourced directly from you upon admission and throughout the course of our relationship with the family.

We will collate further records as your child progresses through school, for example attendance logs and assessment data.

Some records will be collated and provided by third party agencies if your child requires specialist educational support.

Is the processing of personal data optional?

Most of the information that we collect is mandatory and we need it to fulfil our statutory duties as an education provider. We will inform you at the point of collection in instances where the use of your child's data is optional.

Storing and retaining pupil data

To comply with the UK-GDPR, the school only keep personal data for as long as necessary to meet our legal and operational duties.

Our 'Records Management Policy & Retention Schedule' (available at our school office) outlines how long pupil records are kept and how we determine and manage these periods. As a rule of thumb, pupil records are kept until the child's 25th birthday; safeguarding and health related records may be kept beyond this point dependent upon the nature of the records.

Personal data about pupils and their families is stored securely on site. Records kept in electronic format are stored securely on carefully selected databases and systems that are fully encrypted with password protection and two factor authentication utilised where available. Physical records are kept in locked cabinets within locked offices and archive rooms; key access is strictly limited depending upon role.

School staff and those third parties accessing key pupil records are subject to DBS checks and strict confidentiality agreements.

Who we share pupil information with and why?

The school do not share information about pupils without consent unless the law and our policies allow us to do so.

The school routinely share pupil information with the following third parties to fulfil our legal duties as an education provider:

- Schools and higher educational settings that the pupil currently attends or attends once leaving us.
- The Local Authority
- Youth Support Services and Careers Advisors (pupils aged 13+ only)
- The Department for Education
- NHS & Third Party Health Agencies

Appendix A provides further details on statutory data sharing with the above parties.

In addition to statutory data sharing, pupil data is shared with the following third-party providers of services to fulfil our operational duties as an education provider:

- ICT to give pupils access to the necessary school systems.
- Information Management Software Providers to help us manage pupil information more effectively.
- Classroom Apps & Software to provide pupils with access to learning resources.
- Caterers to manage lunchtime provision more effectively.

In certain circumstances, we also share pupil data with the following organisations:

- Auditors to ensure we are complaint and meet best practice standards.
- Third party support agencies if assistance is required to support a pupil's health and wellbeing or educational development (therapists, psychologists etc).
- Police and emergency services if an accident or incident has occurred.
- Professional advisors if assistance is required to support the school with legal advice.
- Governing bodies if an incident or accident has occurred and we have a duty to report the details to them. Examples include the HSE and ICO.
- Insurance provider if we must enact a claim to which you are a party.
- Courts if we are party to a legal claim that involves you and your child.

Checks are performed on third parties with whom we share personal data to ensure they meet the high levels of data protection compliance and security expected by the school. The school take a minimalist approach to data sharing and only provide the limited amount of data if it is strictly necessary.

Transferring data internationally

We do not routinely transfer the personal data of pupils and their families outside of the United Kingdom (UK). If a situation arises whereby we must do so, the school will ensure that the transfer is compliant with the UK-GDPR's rules on international data processing and is sent via secure methods.

Requesting access to your personal data and your rights

Individuals have a number of rights in relation to their own personal data; parents can also exercise these rights on behalf of their child in trust primary schools: In certain circumstances, parents have the right to:

- Ask us about the information we hold about you and your child and request copies of the information by making a 'subject access request'.
- Ask us to rectify any information that you feel is inaccurate or incomplete.
- Ask us to erase the personal information about you and your child in certain circumstances.
- Ask us to restrict or object to the processing of yours or your child's personal information if you do not feel we have legitimate grounds to do so.
- Object to the processing of yours or your child's personal data in situations where processing is optional; we have asked your permission.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.

If you would like to find out further information or make a request relating to your rights, please contact the school office in the first instance. There will not usually be a fee to exercise your data protection rights.

The school will provide you with a response within one calendar month; the school reserves the right to extend the response time for more complex requests by a further two calendar months, we will however inform you of any intention to extend within the first month.

Complaints

If you have any concerns at all about how we process your personal data, please contact us in the first instance so that we can help resolve any issues.

You can also complain to the Information Commissioners Office (ICO) if you are unhappy with how we have used your data:

Information Commissioners Office
 Wycliffe House
 Water Lane
 Wilmslow
 Cheshire
 SK9 5AF

Helpline: 0303 123 1113

Website: <https://www.ico.org.uk>

Appendix 1: Why we must share pupil data?

Data shared between educational settings.

When a pupil transitions between educational settings such as from primary to secondary school, their pupil record moves with them; this is a legal obligation placed on the school to allow each setting to adequately provide an education and support to pupils. Whilst some pupils may be with us on a part-time or temporary basis only, their records form an integral part of supporting the child.

Any transfers completed between educational settings are typically carried out using secure file transfer systems including the DfE's school to school system (S2S) and the Child Protection Online Monitoring and Safeguarding system (CPOMs). Some records will also be transferred using more manual methods.

In many cases, Manchester Hospital Schools is not the main educational setting for a pupil. It is therefore important that we update a pupils primary setting with the progress of their placement with us. This will typically include updates on the pupils educational development and information on their health and wellbeing. We will ensure that any exchange of data is done so securely.

Pupils aged 13 +

Once our pupils reach the age of 13, we also pass pupil information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13–19-year-olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- youth support services
- careers advisers

The information shared is limited to the child's name, address and date of birth. However, where a parent or guardian provides their consent, other information relevant to the provision of youth support services will be shared. This right is transferred to the child / pupil once they reach the age 16.

Pupils aged 16 +

We will also share certain information about pupils aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13–19-year-olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

NHS

The nature of our operations mean that we will likely exchange data about pupils with the NHS and various associated bodies. The nature of the data sharing will typically be determined by the setting and the child's particular needs. For children in our hospital schools, we will be required to update NHS staff and systems on any health based developments that we are notified of. We will also exchange data with the school nurse and other health based professionals in our school settings where if it is necessary to keep them safe.

We must submit the personal data of children in reception and year 6 with the school health service as part of the annual National Childhood Measurement Programme. Further details can be found here:

<https://www.gov.uk/government/publications/national-child-measurement-programme-operational-guidance/national-child-measurement-programme-2022-information-for-schools>

From time to time, the school is part of immunisation programmes and other statutory and routine medical programmes that require us to share pupil data with the NHS. Please note that we do not administer any immunisations or healthcare without the explicit consent of parents or carers.

National Pupil Database

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.

The National Pupil Database (NPD) is owned and managed by the DfE and contains information about pupils in Schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the Department. It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including Schools, local authorities and awarding bodies.

We are required by law, to provide information about our Students to the DfE as part of statutory data collections; the school census is an example of when we share data. Some of this information is then stored in the NPD. The law that allows this is the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>.

DfE Attendance Data

From the start of the 2024-2025 term, schools in England must now share their daily attendance data with the DfE to comply with statutory guidance 'working together to improve school attendance' (2024):

<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance>

The school must share each pupils daily attendance data which is transferred securely through an electronic portal. Parents and guardians can find out more about how the DfE use attendance data by visiting their privacy notice:

https://assets.publishing.service.gov.uk/media/66c8836399faef7c8c117816/DfE_privacy_notice_for_school_attendance_data_collection.pdf