# Privacy Notice – Pupils & Parents

**Document owner: Manchester Hospital Schools**

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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 and your child. 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. Any data protection queries should be forwarded to Carol Shaw, Assistant School Business Manager, via the school office in the first instance:

- **Contact:** Carol Shaw (Assistant School Business Manager)
- **Email:** admin@hospitalschool.manchester.sch.uk
- **Phone:** 0161 509 2368

The categories of pupil information that we process

## Personal Identifiers (general information held on the pupil profile)

- Full Name, Date of Birth, UPN
- Parent / Guardian Full Names, Home Address, Contact Details, Emergency Contact Details
- Image (identification)

- Siblings at School

**Special Characteristics**

- Gender / Sex, 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**

- Assessment & Pupil Progress
- Reports for Parents & School
- Work Books & Sheets
- Careers Provision

**Pastoral Records**

- Attendance
- Behaviour
- Safeguarding & Child Protection

**Health Records**

- Allergies & Dietary Requirements
- Accidents & Injuries
- Medication & Special Educational Needs (SEND)
- Health & Wellbeing

**Operational Records**

- Free & Paid School Meals
- School Trips
- Images (CCTV, 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:

- To support pupil learning
- To safeguard pupils
- To monitor and report on pupil attainment progress
- To provide appropriate pastoral care
- To assess the quality of our services
- To maintain and promote the health and wellbeing of children and others in our care
- To meet the statutory duties placed upon us for DfE data collections

- To advise of any curriculum-related activities we undertake or encourage you to attend
- 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. The school relies on the following lawful bases when we process personal data relating to pupils:

**1. Legal Obligation:** The school processes personal data to meet legal obligations under laws including:

- **Admissions:** *School Admissions Code*

- **Education & Census:** *Children Act 1989*, *Education Act 1996*, *Education Act 2005*, *Education & Inspections Act 2006*, *Education & Skills Act 2008*, *Childcare Act 2006*, *Education Regulations 2002*, and *Education (Information about Individual Pupils, England) Regulations 2013*

- **Equalities:** *Equality Act 2010*

- **Health & Safety:** *Health & Safety at Work Act 1974*

- **Safeguarding:** *Safeguarding Vulnerable Groups Act 2006*, statutory guidance *'Keeping Children Safe in Education' (KCSIE)*, and *'Working Together to Safeguard Children'*

- **SEND:** *Children & Families Act 2014 – SEND Code of Practice*

**2. Public Task:** Personal data is processed in the performance of a public task (e.g., sharing data with the local authority and DfE, maintaining CCTV for site security, providing full-time education, and keeping images for identification).

**3. Contractual Obligation:** Processing personal data when taking payments for school meals, trips, or activities.

**4. Legitimate Interest:** Providing complementary educational resources, learning apps, and software.

**5. Consent:** Where you have provided consent (e.g., optional use of pupil images for promotional/media purposes).

**6. Vital Interests:** Processing data to protect or save someone's life (e.g., sharing emergency medical details with first aiders or emergency services).

**Special category data**

Special Category Data is information that is sensitive in nature (e.g., health, racial or ethnic origin, religious beliefs). The school relies on the following conditions under **Article 9 UK GDPR** and the **Data Protection Act 2018 (Schedule 1)**:

- **Article 9(2)(a) UK GDPR (Explicit Consent):** Where written consent has been provided (e.g., referrals to external health/wellbeing agencies).
- **Article 9(2)(b) UK GDPR (Employment, Social Security & Social Protection):** Fulfilling legal obligations regarding safeguarding and equality of opportunity.
- **Article 9(2)(g) UK GDPR (Substantial Public Interest):** Submitting statutory census data, equal opportunities monitoring, and handling serious safeguarding referrals.
- **Article 9(2)(c) UK GDPR (Vital Interests):** Informing emergency services of known medical conditions or allergies in life-threatening situations.
- **Article 9(2)(f) UK GDPR (Legal Claims):** Defending or establishing legal claims.
- **Article 9(2)(i) UK GDPR (Public Health):** Participating in public vaccination or statutory health monitoring programmes.

**Consent & Children**

A child's personal data belongs to them. Where children are too young or lack capacity to understand their data rights, consent is sought from the parent or guardian. Consent can be withdrawn at any time by contacting the school office.

**CCTV**

Closed Circuit Television is in place across the school site for security, crime prevention, and safety monitoring. Access is strictly controlled, and footage is only reviewed when investigating specific incidents.

**Monitoring – Internet Use & Digital Systems**

In accordance with statutory safeguarding guidance (*KCSIE*), the school monitors internet and digital usage to keep pupils safe online. Automated filtering and monitoring systems alert designated safeguarding leads if prohibited sites or concerning terms are accessed.

**Personal Recording Devices, Wearables & Smart Glasses**

To uphold safeguarding obligations, respect privacy rights, and prevent unauthorised video or audio recording of pupils, staff, or confidential discussions, the school strictly prohibits the use of smart glasses, hidden recording technology, and unauthorised audio/video recording devices on school premises.

- **Meetings & Consultations:** Visitors, parents, and carers must ensure all personal recording devices (including smart glasses and wearables with camera or audio-recording capabilities) are powered off, stowed, or removed prior to attending formal meetings, casework discussions, or entering learning spaces.

- **Unauthorised Recording:** Any unauthorised recording taken on school grounds or during school meetings processed without explicit consent or statutory basis will be treated as a breach of school site security and safeguarding policies.

**Artificial Intelligence (AI)**

Where software incorporating AI is used to support learning or administration, data processed by AI is anonymised, human oversight is maintained for all decisions, and school data is never used to train public AI models.

**Collecting pupil information**

Pupil data is received directly from parents/carers upon admission, as well as via referrals from previous schools, local authorities, the DfE (National Pupil Database), and NHS bodies (for hospital-based school settings).

**Storing and retaining pupil data**

Pupil records are retained securely in line with our *Records Management Policy & Retention Schedule*. As a general rule, pupil records are kept until the child's 25th birthday; safeguarding and health records may be retained longer depending on statutory guidance. Electronic systems use encryption, strong passwords, and multi-factor authentication.

**Who we share pupil information with and why**

The school routinely shares pupil information with:

- Other educational settings (when pupils transition or dual-roll)
- Local Authorities
- Youth Support Services and Careers Advisers (for pupils aged 13+)
- The Department for Education (DfE)
- NHS bodies & healthcare professionals
- IT infrastructure, information management software, catering, and classroom app providers
- Regulators, auditors, emergency services, professional advisers, and courts where legally required

**Transferring data internationally**

We do not routinely transfer pupil personal data outside the UK. Any necessary international transfers via cloud services comply with UK-GDPR rules (such as UK Adequacy Decisions or International Data Transfer Agreements).

**Requesting access to your personal data and your rights**

Under the UK-GDPR, individuals (and parents on behalf of eligible children) have the right to:

- Make a Subject Access Request (SAR)

- Request rectification of inaccurate data
- Request erasure or restriction of data in certain circumstances
- Object to optional processing or automated decision-making

To exercise your rights, contact Carol Shaw, Assistant School Business Manager via the school office. Requests are processed within one calendar month.

**Complaints**

If you have concerns, please contact us first. You can also complain to the Information Commissioner's Office (ICO):

Information Commissioner's 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:** Pupil records move with pupils between settings via secure transfer systems (e.g., DfE S2S or CPOMS) to ensure continuity of education and care. For pupils on temporary placements with Manchester Hospital Schools, progress updates are shared securely with their main school.

**Pupils aged 13+ and 16+:** Under Section 507B of the Education Act 1996, basic contact details are passed to the local authority and youth support service providers to assist with post-16 education, training, and careers advice.

**NHS:** Data is shared with NHS teams, school nurses, and health bodies to support hospital education, public health programmes (such as the National Child Measurement Programme), and routine immunisations (subject to parental consent).

**National Pupil Database (NPD):** The DfE collects statutory census data under the *Education (Information About Individual Pupils) (England) Regulations 2013* for statistical analysis and educational research.

**DfE Attendance Data:** Schools share daily attendance data electronically with the DfE in compliance with statutory guidance *'Working together to improve school attendance'*.