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Rodney House School

Data Protection Policy with Privacy Notices

Reviewed: June 2018

Signed by Governor:

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Appendix A: Staff Privacy Notice

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1. Introduction

Our School aims to provide the best possible education to our pupils. We need to collect personal data about our pupils, staff, parents/guardians, governors and people who provide support and services to the school.

The School is committed to protecting the rights and privacy of individuals in accordance with both United Kingdom and European Union data protection legislation.

The data protection legislation confers rights on individuals as well as responsibilities on those persons processing personal data. This policy sets out how the School seeks to process personal data and ensure that staff and parents understand the rules governing the use of personal data.

The EU General Data Protection Regulation (GDPR EU 2016/679) replaces the Data Protection Directive 95/46/EC and was designed to harmonize data privacy laws across Europe, to protect and empower all EU citizens' data privacy and to reshape the way organizations across the region approach data privacy. The GDPR will be enforced from 25th May 2018. This version of the School's policy has been updated to reflect the GDPR.

2. Scope & purpose

This policy applies to all of the School's personal data processing functions in relation to identified or identifiable natural persons, including those performed on pupils, staff, governors, suppliers and any other personal data the School processes from any source.

Personal data is defined as any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Special categories of personal data - personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade-union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

This policy should be read in conjunction with other relevant School policies such as the Information Security Policy, Social Media Policy, Acceptable Use Policy, IT Security, Internet and Email use policy. The School may supplement or amend this policy by additional policies and guidelines from time to time. Please refer to the School's website for further details.

3. Responsibility for this policy

The School is the data controller.

The Board of Governors, the Headteacher and Deputy Headteacher of the School ("the Management") are committed to compliance with all relevant UK and EU legislation in respect of personal data, and the protection of the rights and freedoms of individuals whose information the School collects and processes.

The School has appointed a Data Protection Officer who will assist the School in monitoring its compliance with the legislation. The responsibilities of the Data Protection Officer are set out in section 7.

4. Data protection principles

All processing of personal data must be conducted in accordance with the data protection principles set out in relevant legislation. School's policies and procedures are designed to ensure compliance with the following principles:-

4.1 Personal data must be processed lawfully, fairly and transparently

Lawfully - the legal basis for processing personal data is normally based on relevant legislation.

Fairly - in order for processing to be fair, the School has to make certain information available to the data subjects. This applies whether the personal data was obtained directly from the data subjects or from other sources.

Transparently - the School will provide the required information to data subjects at the time personal data is collected. The School will ensure that the information provided is detailed and specific, and that such notices are understandable and accessible. Information must be communicated to the data subject in an intelligible form using clear and plain language. The information provided must include information about personal data collected both directly from the data subject and from other sources.

4.2 Personal data can only be collected for specific, explicit and legitimate purposes

The School will collect and process personal data only for the purposes for which it is required. School staff must be alert to requests for processing of personal data for purposes for which it was not collected, no matter how related the processing may appear. Processing should only continue after an assessment of the impact of the new processing. This assessment may be done as a data protection impact assessment; please see section 6.6 of this policy.

4.3 *Personal data must be adequate, relevant and limited to what is necessary for processing (data minimisation)*

The School will ensure that in designing methods of data collection, whether online, forms or within offices, that only the personal data required to identify the data subject(s) and provide the service requested will be processed. The School will undertake regular reviews of the data requested to ensure that the amount of personal data collected is minimised.

4.4 *Personal data must be accurate and kept up to date with every effort to erase or rectify without delay*

All data subjects have a right to ensure that their data is accurate and complete. The School needs accurate and up-to-date data about data subjects in order to ensure that the correct education and services are provided to the correct recipients. All data collection procedures should be designed to ensure that reasonable steps are taken to update personal data where new data has been provided. All changes to personal data should be shared with each third party with whom the previous data had been shared, unless this is impossible or requires disproportionate effort.

4.5 *Personal data must be kept in a form such that the data subject can be identified only as long as is necessary for processing*

The School will implement appropriate policies and procedures to ensure that personal data is retained only for the minimum period required to provide the services requested. This may be done by destroying the personal data, by anonymization or any other appropriate method.

4.6 *Personal data must be processed in a manner that ensures appropriate security*

The School will implement appropriate technical and organisational measures to ensure that appropriate security of the processing of personal data is implemented.

4.7 *Accountability for demonstrating compliance*

The School will ensure that it maintains adequate records of its processing and evidence that it has complied with this policy and related policies and procedures. Responsibility for collecting and maintaining the evidence is with Management. See section 3 of this policy for further guidance.

5. Rights of Individuals whose data is collected

The School will design and maintain appropriate policies, procedures and training to implement the following data rights of data subjects.

5.1 *Right of access by the data subject*

Data subjects have the right to access their personal data. They are entitled to receive a copy of their data held by Rodney House School and other information about Rodney House School's processing of the personal data. The right of access allows individuals to be aware of and verify the lawfulness of the processing.

The School will implement procedures to ensure that requests from data subjects for access to their personal data will be identified and fulfilled in accordance with the legislation within the 30 days permitted.

5.2 *Right to rectification*

Data subjects have a right to have their personal data rectified where it is inaccurate or incomplete.

The School is committed to holding accurate data about data subjects and will implement processes and procedures to ensure that data subjects can rectify their data where inaccuracies have been identified.

5.3 *Right to erasure (right to be forgotten)*

Data subjects have a right to request the deletion or removal of personal data where there is no compelling reason for its continued processing. The right to erasure does not provide an absolute 'right to be forgotten'.

The School processes most personal data it collects because there is a statutory basis for the processing. Where the School receives a request from data subjects looking to exercise their right of erasure then the School will carry out an assessment of whether the data can be erased without affecting the ability of the School to provide future education and services to the data subject. The School will implement appropriate procedures to carry out the assessment and where the right to erasure can be implemented then this should be done.

5.4 *Right to restriction of processing*

Data subjects have a right to block or suppress processing of their personal data in defined circumstances. When processing is restricted, Rodney House School is permitted to store the personal data, but not further process it.

The School will implement and maintain appropriate procedures to assess whether a data subject's request to restrict the processing of their data can be implemented. Where the request for restriction of processing is carried out then the School will write to the data subject to confirm the restriction has been implemented and when the restriction is lifted.

5.5 *Right to data portability*

Data subjects have a right to obtain and reuse their personal data for their own purposes across different services. It allows them to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.

The School processes most personal data it collects because there is a statutory basis for the processing. Where the School has collected personal data on data subjects by consent or by contract then the data subjects have a right to receive the data in electronic format to give to another data controller. It is expected that this right will apply only to a small number of data subjects. The School will implement appropriate procedures to transfer only the relevant personal data.

5.6 *Right to object*

Data subjects have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

Data subjects have a right to object to the processing of his or her personal data. The processing must have been undertaken on the basis of public interest or legitimate interest of the School. If/where such legal bases exist then the School will implement and maintain procedures to allow data subjects to pursue their right to object.

5.7 *Right not to be subject to automated decision making*

Data subjects have the right not to be subject to a decision based solely on automated processing, where such decisions would have a legal or significant effect concerning him or her. The School will ensure that where systems or processes are implemented that an appropriate right of appeal to a member or panel of staff is available to the data subject.

5.8 *Right to complain*

The School will implement and maintain a complaints process whereby data subjects will be able to contact the Data Protection Officer. The Data Protection Officer will work with the data subject to bring the complaint to a satisfactory conclusion for

both parties. The data subject will be informed of their right to bring their complaint to the Information Commissioner's Office and their contact details.

6. Responsibilities of the School

The School has responsibility for the following:

6.1 *Ensuring appropriate technical and organisational measures*

The School will implement appropriate technical and organisational measures to ensure and be able to evidence that it protected personal data always.

6.2 *Maintaining a record of data processing*

The School will maintain a record of its data processing activities in the manner prescribed by the Regulation. The record will be reviewed and signed off by Management, not less than on an annual basis.

6.3 *Implementing appropriate agreements with third parties*

The School will implement appropriate agreements, memoranda of understanding, bilateral agreements and contracts (collectively "agreements") with all third parties with whom it shares personal data. The term third parties is intended to include other agencies and departments of the UK Government. All such agreements shall be implemented in writing prior to the commencement of the transfer of the data. The agreement shall specify the purpose of the transfer, the requirement for adequate security, right to terminate processing, restrict further transfer to other parties, ensure that responses will be given to requests for information and the right to audit.

6.4 *Transfers of personal data outside of the European Economic Area*

The School will not transfer the personal data of its data subjects outside of the European Economic Area unless an adequate level of protection is ensured.

6.5 *Data protection by design and by default*

The School will implement processes, prior to the time of determining the means of processing as well as when actually processing, to implement appropriate technical and organisational measures to implement the data protection principles set out in Section 4 and integrate necessary safeguards into the processing to meet GDPR requirements.

6.6 *Data protection impact assessments*

The School will implement procedures and documentation whereby all new types of processing, in particular using new technologies, that result in a high risk to the rights and freedoms of its data subjects shall carry out a data protection impact assessment. As part of this process, a copy of the impact assessment shall be shared with the Schools Data Protection Officer.

Where the School is unable to identify measures that mitigate the high risks identified then the School will consult with the Information Commissioner's Office prior to the commencement of processing.

6.7 *Personal data breaches*

The School defines a 'personal data breach' as meaning a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed. (e.g. the most common breach incidents that can occur are correspondence issuing to an unauthorised third party). The School deems any loss of personal data in paper or digital format to be a personal data breach.

The School will develop and maintain a protocol for dealing with personal data breaches. This protocol will establish the methodology for handling a personal data breach and for notification of the breach to the Information Commissioner's Office and to data subjects where this is deemed necessary.

6.8 *Freedom of Information*

The Freedom of Information Act (FOI) obliges the School to publish information on their activities and to make the information they hold, including personal information, available to members of the public.

The School maintains a separate policy to ensure compliance with FOI. The School will maintain procedures to ensure that requests for its data are correctly fulfilled under either data protection legislation or FOI legislation.

6.9 *Governance*

The School will monitor compliance with UK & EU laws through the Board of Governors. The Board of Governors will:

- Determine metrics for monitoring & reporting key data protection statistics;
- Receive regular reports of data protection activities;
- Receive regular reports from the Data Protection Officer;
- Review data protection impact assessments and approve or not the design of data protection elements of projects;
- Instigate investigations of data protection matters of interest;
- Arrange internal audits, or similar, of School for compliance with this policy;
- Any other such activities relating to the School's compliance with UK & EU Law in the area of data protection.

7. The Data Protection Officer's Responsibilities

The Board of Governors will appoint a Data Protection Officer. The Data Protection Officer will report to the Board of Governors regarding the tasks allocated to them. The responsibilities of the Data Protection Officer will include the following:

- i. Keep the Board of Governors and Senior Management updated about data protection responsibilities, risks and issues;
- ii. Act as an advocate for data protection within the School;
- iii. Monitor compliance with EU Regulations on data protection, ePrivacy and UK Data Protection Laws and Regulations;
- iv. Monitor all data protection policies and procedures, ensuring they are reviewed and updated on a regular basis;
- v. Ensure that the School provides appropriate data protection training and advice for all staff members and those included in this policy;
- vi. Provide advice where requested as regards the data protection impact assessments and monitoring that such assessments are completed to an appropriate standard;
- vii. Provide advice on data protection matters from staff, governors, parents and other stakeholders;
- viii. Respond to individuals such as parents and employees who wish to know which data is being held on them by the School;
- ix. Ensure that appropriate data processing agreements are put in place with third parties that handle the School's data and ensure that reviews are carried out of third parties on a regular basis;
- x. Ensure that the record of data processing is updated regularly;
- xi. Act as a contact point and provide cooperation with the Office of the Information Commissioner.

8. Responsibilities of staff and similar parties

Anyone who processes personal data on behalf of the School has a responsibility to comply with this data protection policy.

8.1 Training

All staff will receive training on this policy. New members of staff will receive training as part of the induction process. Training will be refreshed yearly or whenever there is a substantial change in the law or the School's policy and procedures.

Training will cover:

- The General Data Protection Regulation and its impact on schools;
- School's data protection management and related policies and procedures.

Completion of training is compulsory.

8.2 Consequences of failing to comply

The School takes compliance with this policy very seriously. Failure to comply puts both you and the School at risk.

The importance of this policy means that failure to comply with any requirement may lead to disciplinary action under School procedures, which may result in dismissal.

9. Where to go if you have queries about the data protection policy

If you have queries on any aspect of this policy, or the GDPR in general, please contact the School's Data Protection Officer:

Emma Maddocks
Rodney House School
Albert Grove
Longsight
Manchester
M12 4WF
e.maddocks@manchester.gov.uk

Privacy Notice (How we use workforce information)

The categories of school information that we process include:

- ❖ personal information (such as name, employee or teacher number, national insurance number)
- ❖ characteristics information (such as gender, age, ethnic group)
- ❖ contract information (such as start date, hours worked, post, roles and salary information)
- ❖ work absence information (such as number of absences and reasons, AMRs)
- ❖ qualifications (and, where relevant, subjects taught)
- ❖ references and interview notes
- ❖ verification of legal right to work in the UK (such as a copy of a passport)
- ❖ next of kin details (name, address and telephone number)
- ❖ medical information and disabilities (if relevant)
- ❖ bank details
- ❖ performance management/disciplinary action
- ❖ DBS number and date including any disclosures
- ❖ Images (CCTV)

Why we collect and use workforce information

We use workforce data to:

- a) enable the development of a comprehensive picture of the workforce and how it is deployed
- b) inform the development of recruitment and retention policies
- c) enable individuals to be paid
- d) monitor absence, provide sick pay
- e) ensure suitability to the role
- f) ensure the legal right to work in the UK, no convictions
- g) monitor accidents and incidents
- h) ensure security of the school site
- i) be aware of any adaptations or medical intervention which may be needed
- j) contact next of kin in an emergency
- k) record accidents and incidents

Under the *General Data Protection Regulation (GDPR)*, the legal basis / bases we rely on for processing personal information for general purposes are will be one or more of the following:

- ❖ to satisfy our legal obligations and statutory duties as your employer.
- ❖ to carry out a task in the public interest or in the exercise of official authority in our capacity as a school.
- ❖ to meet our contractual obligations in relation to your statement of employment contract with us.

The school needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer pension and insurance entitlements.

In some cases, the school needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with health and safety laws and to enable employees to take periods of leave to which they are entitled.

In other cases, the school has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the school to;

- ❖ maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- ❖ operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- ❖ operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
- ❖ operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- ❖ obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
- ❖ operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the organisation complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ❖ ensure effective general HR and business administration;
- ❖ ensure effective HMRC, pension and payroll administration;
- ❖ provide references on request for current or former employees;

- ❖ respond to and defend against legal claims; and
- ❖ maintain and promote equality in the workplace

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations, such as those in relation to employees with disabilities. Medical data is processed under the lawful basis of vital interest. Where the school processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring. Data that the organisation uses for these purposes is collected with the express consent of employees on the application form and new starter booklet, which can be withdrawn at any time. Employees are entirely free to decide whether or not to provide such data and there are no consequences of failing to do so.

Collecting workforce information

We collect personal information via application forms, new starter booklets, data collection sheets.

Workforce data is essential for the school's / local authority's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

Storing workforce information

We hold data securely for the set amount of time shown in our data retention schedule. A copy of our data retention schedule is available from the school office.

We take the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. To ensure the confidentiality, integrity and availability of information, a number of technical and administrative controls are in place.

Who we share workforce information with

We routinely share this information with:

- ❖ Manchester City Council (where applicable)
- ❖ the Department for Education (DfE)
- ❖ One Education (HR)
- ❖ The Disclosure and Barring Service (DBS)
- ❖ HMRC
- ❖ Pension providers

Why we share school workforce information

We do not share information about our workforce members with anyone without consent unless the law and our policies allow us to do so.

Local authority

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

Department for Education

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections. We are required to share information about our children and young people with the Department for Education (DfE) for the purpose of those data collections, under:

We are required to share information about our school employees with the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Nuala Finegan, Headteacher or Emma Maddocks, Data Protection Officer (DPO)

schools.dpo@manchester.gov.uk

You also have the right to:

- ❖ object to processing of personal data that is likely to cause, or is causing, damage or distress
- ❖ prevent processing for the purpose of direct marketing
- ❖ object to decisions being taken by automated means
- ❖ in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- ❖ a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Contact

If you would like to discuss anything in this privacy notice, please contact Michelle Toy, School Business Manager or Emma Maddocks, Data Protection Officer (DPO)

schools.dpo@manchester.gov.uk

How Government uses your data

The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy
-

Data collection requirements

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Sharing by the Department

The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

To contact the department: <https://www.gov.uk/contact-dfe>

To be reviewed annually

To be approved June 2019

Signed by governor:

Privacy Notice (How we use pupil information)

This notice is to help you understand how and why we collect your personal information and what we do with that information. It also explains the decisions that you can make about your own information. Rodney House School is the data controller of the pupil personal information you provide to us. This means that the school determines the purposes for which, and the manner in which, any personal data relating to pupils and their families is to be processed. Emma Maddocks is the Data Protection Officer (DPO). The DPO role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the General Data Protection Regulations (GDPR)

The categories of pupil information that we collect, hold and share include:

- ❖ Personal information (such as name, unique pupil number and address)
- ❖ Characteristics (such as ethnicity, language, nationality, country of birth and free school meal eligibility)
- ❖ Attendance information (such as sessions attended, number of absences and absence reasons)
- ❖ Assessment information
- ❖ Medical information
- ❖ Details of support received, including care packages, plans and support provided
- ❖ Special Educational Needs and Disability
- ❖ Behaviour and exclusions
- ❖ Safeguarding information
- ❖ Photographs
- ❖ CCTV images
- ❖ Information related to pupil premium eligibility

We may also hold data about pupils that we have received from other schools and local authorities.

Why we collect and use this information

We use the pupil data:

- ❖ to support pupil learning
- ❖ to monitor and report on pupil progress
- ❖ to provide appropriate pastoral care
- ❖ to assess the quality of our services
- ❖ to comply with the law regarding data sharing
- ❖ to safeguard pupils
- ❖ to support health and wellbeing

The lawful basis on which we use this information

On 25th May 2018 the Data Protection Act 1998 will be replaced by the General Data Protection Regulation (GDPR). The condition for processing under the GDPR will be:

Article 6

1. Processing shall be lawful only if and to the extent that **at least** one of the following applies:

- a) Data subject has given consent
- b) Necessary for the performance of a contract to which the data is a party
- c) Compliance is necessary for compliance with legal obligations
- d) To protect the vital interests of the data subject or of another person
- e) For the performance of a task carried out in the public interest
- f) Necessary for the purposes of the legitimate interests pursued by the controller or by a third party

Article 9

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and the processing of genetic and/or biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be prohibited.

2. Paragraph 1 shall not apply if one of the following applies:

(j) Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on

Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

The Education Act 1996 - Section 537A - states that we provide individual pupil information as the relevant body such as the Department for Education.

Children's Act 1989 - Section 83 - places a duty on the Secretary of State or others to conduct research.

Collecting pupil information

Whilst the majority of pupil information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the *General Data Protection Regulation*, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing pupil data

Pupil data is retained in accordance with the school's data protection policy and associated records retention schedule. The school does not store personal information indefinitely; data is only stored for as long as is necessary to complete the task for which it was originally collected.

Who we share pupil information with

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

- ❖ Schools that the pupil's attend before or after leaving us - to share information to support education, wellbeing and safeguarding
- ❖ Our Local Authority - to meet statutory obligations
- ❖ the Department for Education (DfE) - to meet statutory obligations
- ❖ NHS - health and wellbeing
- ❖ Health and Safety Executive - to meet statutory obligations
- ❖ Children's Social Care - health & well being and safeguarding
- ❖ Ofsted - to meet statutory obligations
- ❖ Multi -Agency Support Hub - safeguarding
- ❖ School website & social media - to celebrate success
- ❖ Suppliers & Service providers - to support education and wellbeing
- ❖ Professional advisers & consultants - to support education and wellbeing
- ❖ ICT Support - to support education
- ❖ Police forces, courts, tribunals - education and safeguarding
- ❖ Professional Bodies - to support education, health and wellbeing
- ❖ Education transport - education and safeguarding

Why we share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

We share pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with our local authority (LA) and the Department for Education (DfE) under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Data collection requirements:

To find out more about the data collection requirements placed on us by the Department for Education (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education 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 pupils to the DfE as part of statutory data collections such as the school census and early years' census. 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>.

The department may share information about our pupils from the NPD with third parties who promote the education or well-being of children in England by:

- ❖ conducting research or analysis
- ❖ producing statistics
- ❖ providing information, advice or guidance

The Department has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data.

Decisions on whether DfE releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- ❖ who is requesting the data
- ❖ the purpose for which it is required
- ❖ the level and sensitivity of data requested: and
- ❖ the arrangements in place to store and handle the data

To be granted access to pupil information, organisations must comply with strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the department's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the department has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact DfE: <https://www.gov.uk/contact-dfe>

Requesting access to your personal data

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact Emma Maddocks, Data Protection Officer by email schools.dpo@manchester.gov.uk

You also have the right to:

- ❖ object to processing of personal data that is likely to cause, or is causing, damage or distress
- ❖ prevent processing for the purpose of direct marketing
- ❖ object to decisions being taken by automated means
- ❖ in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- ❖ claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at:

- <https://ico.org.uk/concerns/>
- Call 0303 123 1113
- Or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact

If you would like to discuss anything in this privacy notice, please contact: Michelle Toy, School Business Manager, by telephone on 0161 230 6854 or email admin@rodneyhouse.manchester.sch.uk or Emma Maddocks, Data Protection Officer, by email schools.dpo@manchester.gov.uk

To be reviewed annually

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