

# Pupil and Parent Privacy Notice



**William Hulme's Grammar School**  
The best in everyone™  
Part of United Learning

## **Pupil and Parent Privacy Notice for William Hulme's Grammar School, a United Learning Trust Academy**

This notice is intended to provide information about how the Academy will use or “process” personal data about individuals including current, past and prospective pupils and their parents, carers or guardians (referred to in this notice as “parents”).

### **Responsibility for Data Protection**

The data controller for personal information held by William Hulme's Grammar School is United Learning Trust (ULT). ULT is registered with the Information Commissioner's Office (ICO). The registration number is Z7415170.

The Company Secretary is the Data Protection Officer (DPO) and is responsible for ensuring that ULT complies with the Data Protection Law. They can be contacted on [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk) or 01832 864538.

The Principal is responsible for ensuring that the Academy complies with ULT's policies and procedures in relation to Data Protection. They can be contacted on 0161 226 2054.

### **Why we collect and use Personal Data about pupils and parents**

William Hulme's Grammar School and United Learning Trust collect, create and hold personal information relating to our pupils and may also receive information about them from their previous school, local authority and/or the Department for Education (DfE). We also collect and hold personal information about our pupil's parents and carers. We use this personal data to:

- Provide education services (including SEN), career services and extra-curricular activities to pupils, monitor pupils' progress and educational needs.
- To safeguard pupils' welfare and provide appropriate pastoral (and where necessary, medical) care.
- To enable pupils to take part in national or other assessments, and to publish the results of public examinations or other achievements of pupils at the school.
- To ensure equality of opportunity and to comply with the public sector equality duty in the Equalities Act 2010.
- To maintain relationships with alumni and the school community.
- For the purposes of management planning and forecasting, research and statistical analysis and to enable ULT to monitor the Academy's performance.
- To monitor use of the Academy's IT systems in accordance with the school's Acceptable Use Policy.
- To receive information about current and prospective pupils from any educational institution that they attended.
- To confirm the identity of prospective pupils and their parents.
- To make use of photographic images of pupils in school publications, on the school website in accordance with the Academy's policy on taking, storing and using images of children.
- To create invoices and process payments for services such as school meals, school trips etc.
- For security purposes, and for regulatory and legal purposes (for example child protection and health and safety) and to comply with its legal obligations.
- To meet statutory duties placed upon us by the Department of Education.

- To receive from and provide reports to any organisation that may be working with your child.
- Where otherwise reasonably necessary for the school's purposes, including to obtain appropriate professional advice and insurance for the Academy.
- To keep you updated about the activities of the Academy including by sending updates and newsletters by email and post.
- To organise trips and visits both in the UK and abroad.
- To enable parents and pupils to take part in surveys concerning the school.

## **The Categories of Personal Data held about Pupils**

The types of personal data processed by the Academy include:

1. Names, addresses, telephone numbers, email addresses and other contact details.
2. Unique Pupil Number (UPN) Academic records and national curriculum assessment results, including examination scripts and marks.
3. Personal characteristics such as your ethnic group, religious beliefs, any special educational needs you may have and any relevant medical information.
4. Attendance information, behavioural records, any exclusion information.
5. Information on the eligibility, and changes in eligibility, for free school meals.
6. Where applicable pastoral and safeguarding records.
7. Eligibility for 30 hours free childcare (nursery pupils only).
8. Information provided by previous educational establishments and or other professionals or organisations working with pupils.
9. Accident records
10. Medical and administration (such as doctors' information, child health, dental health, allergies, medication, and dietary requirements)
11. Where pupils go after they leave the Academy.
12. For pupils enrolling for post 14 qualifications, the Learning Records Service will give us the unique learner number (ULN) and may also give us details about your learning or qualifications.
13. Images captured by the Academy's CCTV system (in accordance with the school's policy on taking, storing and using images of children).

## **The Legal Basis for the Processing of Pupil and Parent Data**

Under the UK GDPR the lawful bases we rely on for processing pupil and parent information are: The processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Where we process data to comply with a regulatory duty our lawful basis is 'necessary to comply with our legal obligations'.

### **Condition for Processing Special Category Personal Data**

Information relating to racial or ethnic origin, religious beliefs and disability will be processed for the purposes of ensuring equality of opportunity and treatment and, when necessary for complying with our legislative obligations.

Medical information will be processed where it is in the vital interests of the pupil.

Health data relating to accidents may be processed for insurance purposes.

## Data Retention Periods

The pupil's educational record will move with the pupil to their next school. Where the School is the last school that the pupil attends the records will be kept until the pupil is 25 years old.

Admissions information will be retained for one year post successful admission or closure of appeal.

Information relating to financial transactions will be kept for 7 years.

For further information on how long we keep personal data for, please refer to our [Records Retention Schedule](#).

## Data Security

ULT has in place technical and organisational measures that ensure a level of security appropriate to the sensitive nature of the personal data that we process. For further information regarding how we keep personal data secure please refer to our security of personal data policy.

## Data Processors

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with UK GDPR and the Data Protection Act 2018 (and any subsequent legislation related to data protection in applicable jurisdictions).

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

We currently use the following data processors:

- Arbor
- Live Register (cashless catering)
- Hegarty Maths
- ParentPay
- FFT
- 4 Matrix
- Access Dimensions (finance system)
- Microsoft Office 365
- CPOMS
- GI Tech Services
- GL Assessments
- Clerks Associates
- Classroom Monitor
- Westminster (CCF)
- Atkinson Report Generator
- School Seating Planner
- CEM
- Kerboodle
- ActiveLearn
- MIST Services
- Caterlink
- Our Futures (work experience)
- Online Free School Meals System
- Discovery Education (Expresso)
- UCAS
- Unifrog
- Eclipse Library System
- 2 Simple
- GCSEPod
- A2C
- Egress
- LYSS.CV-management
- Duke of Edinburgh's Award Scheme
- The School Photography Company
- PaperCut
- YacaPaca
- Edurio
- Poppulo
- Edukey
- Accessit
- Mega Seater Planner
- School Cloud

- Springpod
- Edukit

- Bikeability Balance
- PPP App

## Sharing Data with Third Parties (other data controllers)

We may share data with the following recipients:

- The Department for Education, including the Education & Skills Funding Agency (ESFA) and Learner Records Service (LRS)
- The School's Parents' Association
- The Old Hulmeians' Association
- The Local Authority (Manchester)
- OFSTED
- Examination Boards
- Ministry of Defence
- Duke of Edinburgh's Award Scheme
- NHS PCT
- IntraHealth
- The Tutor Trust
- StaffSafe
- Welfare Call
- Times Tables Rockstars
- Ruth Miskin Portal

### Keeping in Touch and Supporting the School

We would like to share pupil and parent personal data with our Alumni Association. We will only do so if you have signed the appropriate consent form. Details of how these groups use your personal data are given on the consent form. Consent may be withdrawn at any time by writing to the school Finance Department.

### Careers Guidance

**Our Futures** (Year 11 students only) - basic pupil data to support tailored IAG with post-16 pathways (names; academic profile; SEND needs or status such as LAC or PLAC)

**CCIS Data Governance Team** - basic pupil data to support LA track and monitor post-16 destinations (ULN; names, DOB, Address, telephone/mobile, ethnicity and destinations)

### References

We will provide references to any other educational institution that the pupil proposes to attend and to potential employers of past and present pupils.

### School Inspections

On request we will share academic records with inspectors from Ofsted.

### Department for Education

We are required, by law, to pass some information about our pupils to the Department for Education (DfE). This information will, in turn, then be made available for use by internal agencies (the ESFA and the LRS) and the Local Authority. The ESFA use this information to determine the school's funding; and the LRS issue post-14 Unique Learner Numbers and give access to information about previous qualifications to the school.

The information you supply is used by the Learning Records Service (LRS). The LRS issues Unique Learner Numbers (ULN) and creates Personal Learning records across England, Wales and Northern Ireland, and is operated by the Education and Skills Funding Agency, an executive agency of the Department for Education (DfE). For more information about how your information is processed, and to access your Personal Learning Record, please refer to: [www.gov.uk/government/publications/lrs-privacy-notice](http://www.gov.uk/government/publications/lrs-privacy-notice).

We also share attendance data with the DfE. The DfE will use this data to identify national, regional and local trends and patterns on school attendance.

DfE may also share pupil level personal data that we supply to them, with third parties. This will only take place where legislation allows it to do so and it is in compliance with UK GDPR and the Data Protection Act 2018 (and any subsequent legislation related to data protection in applicable jurisdictions).

Decisions on whether DfE releases this personal data to third parties are subject to a robust approval process and are 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 level data, requestors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

For more information on how this sharing process works, please visit:  
[www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract](http://www.gov.uk/guidance/national-pupil-database-apply-for-a-data-extract)

For information on which third party organisations (and for which project) pupil level data has been provided to, please visit: [www.gov.uk/government/publications/national-pupil-database-requests-received](http://www.gov.uk/government/publications/national-pupil-database-requests-received)

If you need more information about how our local authority and/or DfE collect and use your information, please visit:

- our local authority at [Manchester.gov.uk](http://Manchester.gov.uk) or
- the DfE website at [www.gov.uk/data-protection-how-we-collect-and-share-research-data](http://www.gov.uk/data-protection-how-we-collect-and-share-research-data)

We will not give information about our pupils to any other third parties without your consent unless the law and our policies allow us to do so.

### **Ministry of Defence**

We are required to pass information on pupils who enrol into the CCF to the Ministry of Defence. The MOD is subject to the strict data protection policies which all Government Departments must comply with.

### **Duke of Edinburgh's Award Scheme**

Pupils who enrol onto the various levels of the Duke of Edinburgh's Award Scheme are required to input data into the Scheme' database.

### **NHS PCT**

We may receive and pass data to the NHS PCT in respect of immunisations which take place in the school. We may also receive and pass data to the NHS PCT concerning any pupil with medical needs or an HCP. Pupils may speak confidentially about various matters to the on-site NHS PCT nurse, but no information is passed to the nurse or the NHS PCT by the school in these instances. The NHS PCT may be involved in multi-agency discussions about safeguarding.

## **Rights of the Data Subject**

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights, please contact the academy's principal.

### **Right of Access to Personal Data "Subject Access Request"**

You have the right to access the personal data that the school holds about you. Requests need to be made in writing or orally (if requested orally, we will make a record of that request to ensure it is met within the required timescale). Parents also have the right to request the personal data held about their children (If your child is over the age of 12 they will also need to sign the request). We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

### **Right to Withdraw Consent**

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

### **Right to Rectification**

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

### **Right to Erasure**

You have the right to have personal data erased in certain specific circumstances. If you make such a request, we will consider whether the right to erasure applies and give you a full and reasoned response.

### **Right to Restrict Processing**

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request, we will consider whether the right to restrict processing applies and give you a full and reasoned response.

### **Further Information**

For further information regarding your rights please refer to our rights of the data subject policy.

If you disagree with a decision that we have taken regarding the processing of your personal data, please contact ULT's Company Secretary:

Alison Hussain, on 01832 864538 or [company.secretary@unitedlearning.org.uk](mailto:company.secretary@unitedlearning.org.uk)

You also have the right to lodge a complaint with the information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>.