

Pupil and parent carer privacy notice

Updated September 2026 | Version 2.0 | England

This notice explains how we use personal information about pupils, parents, carers and emergency contacts, why we need it, who we share it with and the rights you have. You do not need to sign or consent to this privacy notice. Optional publicity choices are provided separately at the end.

Who is responsible for your information

School: **St Agnes CE Primary School**. The data controller, which decides how and why personal information is used, is **St Agnes Governing Body**.

Controller contact: **50 Hamilton Road, Longsight, Manchester, M13 0PE**. Where another organisation controls particular records, we explain its role when relevant.

Our Data Protection Officer service is provided by Global Policing Limited. Email: data@globalpolicing.co.uk. Telephone: 0161 510 2999 (answerphone). Website: www.globalpolicing.co.uk/data. You may contact the school or the DPO about this notice or your rights.

We follow the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended, including by the Data (Use and Access) Act 2025.

Information we collect and where it comes from

We collect information from you and your child, previous schools, local authorities, education and health professionals, and safeguarding agencies. We also create records during education and school activities. Information may include:

- Names, dates of birth, addresses, contact details, pupil identifiers, parental responsibility, emergency contacts and relevant family circumstances.
- Admissions, attendance and absence reasons, attainment, assessments, behaviour, exclusions, school transfers, trips and support provided.
- Special educational needs and disabilities, health and allergy information, care plans, safeguarding concerns and referrals; ethnicity, religion or other characteristics where relevant and lawful.
- Parent and carer communications, complaints, payment and funding eligibility information, including free school meal eligibility; photographs and system-use records where applicable.

Why we use information and our lawful bases

We use information to provide education, support learning and wellbeing, manage attendance and behaviour, protect children, communicate with families, administer services and funding, and meet reporting and record-keeping duties. We use the minimum information needed for each purpose.

Education and school administration

For a maintained school or academy, delivering education and associated pastoral and administrative functions normally relies on public task under Article 6(1)(e). Compliance with a specific statutory duty relies on legal obligation under Article 6(1)(c). These bases cover necessary processing rather than an unrestricted right to use information.

Applicable education duties may include the Education Act 1996 and the Education (Information About Individual Pupils) (England) Regulations 2013, as amended, for relevant pupil information returns. St Agnes CE Primary School is a maintained school. Its main purpose is to provide education to its pupils.

Health safeguarding and other sensitive information

Health, ethnicity, religion and certain other information require an additional condition under Article 9. For necessary safeguarding we may use substantial public interest under Article 9(2)(g), with the applicable Data Protection Act 2018 Schedule 1 condition, including paragraph 18 for safeguarding children and individuals at risk where its requirements are met. Other statutory functions may use paragraph 6 where applicable. We maintain an appropriate policy document where required.

Processing of Special Category (Sensitive) Personal Data

To provide appropriate educational and pastoral support, safeguard well-being, fulfill our statutory duties as a school, and ensure equal opportunities, we process more sensitive personal information (known as **special category data**). This includes information regarding health, medical conditions, Special Educational Needs and Disabilities (SEND), and ethnicity.

Whenever we process this data, we ensure we meet a lawful basis under **Article 6** of the UK GDPR, alongside a specific condition under **Article 9** of the UK GDPR and **Schedule 1 of the Data Protection Act 2018 (DPA 2018)**.

Depending on the purpose, the school relies on the following legal conditions:

- **Special Educational Needs and Disabilities (SEND) Support**
 - **Purpose:** To assess, plan, and deliver tailored educational support, adapt school environments, manage Education, Health and Care Plans (EHCPs), and coordinate with educational psychologists and local authorities.
 - **Article 9 Condition: Article 9(2)(b)** (Necessary for carrying out obligations and exercising specific rights in the field of employment and social security and social protection law).
 - **Schedule 1 Provision: Part 1, Paragraph 1** (Employment, social security and social protection).
- **Health, Medical, and Care Arrangements**
 - **Purpose:** To manage allergies and medical conditions, administer daily medication, create Individual Healthcare Plans (IHPs), and coordinate with NHS or school nursing teams.
 - **Article 9 Condition: Article 9(2)(h)** (Necessary for the provision of health or social care or treatment, or the management of health or social care systems).
 - **Schedule 1 Provision: Part 1, Paragraph 2** (Health or social care purposes).
- **Safeguarding and Pastoral Care**
 - **Purpose:** To protect the physical, mental, and emotional well-being of pupils, identify and protect children at risk of harm, and collaborate with social care or child protection agencies.
 - **Article 9 Condition: Article 9(2)(g)** (Necessary for reasons of substantial public interest).
 - **Schedule 1 Provision: Part 2, Paragraph 18** (Safeguarding of children and of individuals at risk).
- **Equality and Diversity Monitoring**

- **Purpose:** To monitor and ensure equal opportunities, reduce educational disparities, and submit statutory census returns to the Department for Education (DfE).
- **Article 9 Condition: Article 9(2)(g)** (Necessary for reasons of substantial public interest).
- **Schedule 1 Provision: Part 2, Paragraph 8** (Equality of opportunity or treatment).
- **Emergency and Critical Incidents**
 - **Purpose:** To protect life or safety in an absolute medical emergency (e.g., sharing medical details with paramedics if a student or staff member is incapacitated).
 - **Article 9 Condition: Article 9(2)(c)** (Protecting the vital interests of the data subject or another natural person where they are physically or legally incapable of giving consent).
 - **Schedule 1 Provision: Part 3, Paragraph 24** (Vital interests).

The school maintains an **Appropriate Policy Document (APD)** that outlines the safeguards and retention policies we have in place when processing these special categories of data, as required by the Data Protection Act 2018.

Criminal offence information is handled only where Article 10 and the applicable domestic-law authorisation permit it.

In a genuine emergency we may rely on vital interests under Article 6(1)(d). For special category information, Article 9(2)(c) also requires that the person is physically or legally incapable of consenting. Routine health support is not automatically treated as an emergency.

Optional uses and required information

We seek freely given, specific consent under Article 6(1)(a) for optional publicity uses where appropriate. Essential education, necessary safeguarding, lawful school transfers and statutory returns do not depend on signing the optional form. We identify our lawful basis before using information.

When requesting information we explain whether it is required by law, needed to provide a service or optional, and the consequences of not providing it. Missing essential details may prevent us from arranging a requested service or suitable support. Please tell the school when your details change.

Sharing protecting and retaining information

We share relevant personal information only where it is strictly necessary and lawful to do so. Depending on the purpose, recipients of your data may include:

- **Receiving schools and colleges** to ensure a smooth educational transition.
- **Our Local Authority, Manchester City Council**, and its commissioned services to meet our statutory duties regarding education, welfare, and admissions. You can view their full policy on the Manchester City Council Education Privacy Notice.
- **The Department for Education (DfE)** for statutory data collections.
- **Examination bodies and boards** to register pupils and administer exams.
- **Health professionals and school nursing teams** to manage clinical care and medical needs.
- **Safeguarding partners, social care, the police, or the courts** where necessary to protect child welfare or prevent crime.
- **Approved third-party providers** who support daily school operations and services. [\[1\]](#)

School Suppliers and Data Processors

We use a range of external suppliers to support our management information systems (MIS), digital learning platforms, IT infrastructure, school communications, payment processing, and school trips.

When these suppliers handle personal data on our behalf, they act as our **data processors**. They are bound by strict contractual security obligations and are only permitted to process data under our documented instructions. Individual parental permission is not required for their necessary operational work.

Other partners we work with may act as independent data controllers who handle your data in accordance with their own privacy notices. For a full, up-to-date list of our current suppliers and services, please contact the school office.

Sharing with the Department for Education (DfE)

We are legally required to share statutory pupil information with the DfE under relevant educational duties. This includes data transferred via the **School Census, Key Stage Assessments, and Daily Attendance Returns**.

The DfE stores this information securely and uses it to populate the statutory National Pupil Database (NPD). The DfE is an independent data controller for its own processing and outlines exactly how it collects, holds, and further shares this data in its [DfE Personal Information Charter](#).

Security and school technology

Access is limited to people who need information for their work. We use appropriate organisational and technical safeguards and verify identity and authority before releasing personal information. Medical care information is shared only with those who need it; optional publicity consent does not authorise unrestricted display of medical details.

To ensure the safety, security, and well-being of our pupils, staff, and visitors, the school operates technical monitoring systems.

1. Closed-Circuit Television (CCTV)

- **What is captured:** Video and image footage of individuals within the school grounds and building perimeters. We do not capture audio.
- **Why we use it:** To maintain a safe environment, deter vandalism or theft, and assist in the prevention and detection of crime.
- **Lawful basis:** **Article 6(1)(e)** (Public Task) – necessary for the performance of a task carried out in the public interest, and **Article 6(1)(f)** (Legitimate Interests) for property security.
- **Who can access it:** Only authorised members of the Senior Leadership Team and designated site security personnel. Footage may be shared with the police or emergency services if legally required.
- **Retention:** CCTV footage is automatically overwritten after **30 days** unless required for an active investigation.
- **Separate policy:** For full details, please refer to our standalone **CCTV Policy** available on the school website.

2. Online Filtering and Monitoring Systems

- **What is captured:** Logs of internet activity, search terms, websites visited, and digital communications sent or received when using the school network or school-issued devices.
- **Why we use it:** To comply with our statutory safeguarding duties under *Keeping Children Safe in Education (KCSIE)*, preventing pupils from accessing harmful, inappropriate, or illegal content.
- **Lawful basis:** **Article 6(1)(e)** (Public Task) and **Article 9(2)(g)** (Substantial Public Interest), specifically satisfying **DPA 2018 Schedule 1, Part 2, Paragraph 18** (Safeguarding of children and of individuals at risk).
- **Who can access it:** The Designated Safeguarding Lead (DSL) and authorised IT administrators receive alerts regarding high-risk digital behaviour.
- **Retention:** Monitoring logs are securely retained in line with our standard safeguarding record retention periods.

3. Biometric Recognition Systems

- The school **does not use** any biometric systems, such as fingerprint or facial recognition software, for registration, library checkout, cashless catering, or any other purpose.

4. Artificial Intelligence (AI) and Automated Profiling

- The school **does not use** Artificial Intelligence (AI) tools, automated processing, or machine learning algorithms to process personal data or make decisions about pupils, parents, or staff.

International Transfers of Personal Information :While the vast majority of the personal information we collect is stored securely within the UK or the European Economic Area (EEA), some of our cloud service providers, IT systems, or software support desks may host or access data internationally.

Whenever personal data is transferred to or accessed from a country outside the UK, we ensure that appropriate safeguards are in place to guarantee your information remains protected to UK standards. These safeguards include:

- **Adequacy Regulations:** Transferring data to countries that the UK government has officially recognised as having an adequate level of data protection (such as the EU/EEA).
- **Standard Contractual Safeguards:** Using UK International Data Transfer Agreements (IDTAs) or approved Standard Contractual Clauses (SCCs) alongside robust technical security assessments.

If you wish to obtain further details regarding the specific international transfers built into our school software systems or request a copy of the safeguards in place, please contact the school's Data Protection Officer.

How long we keep information

We apply different retention periods to different records. Our retention schedule is available at the school office. It sets out the periods or criteria for pupil and parent records, safeguarding, attendance, finance, images and system logs. We consider legal duties, safeguarding needs, transfers and the time reasonably needed to handle complaints or legal claims. Records subject to a lawful preservation requirement are retained until it ends.

Primary pupil records normally transfer to the next school; secondary pupil records are generally retained to the pupil's 25th birthday. Safeguarding records may need longer retention, including child sexual abuse records under current guidance. There is no blanket promise to erase all information at age 25 or all parent information when a child leaves. We securely destroy or anonymise records when no longer needed.

Your rights and how to contact us

You can ask for access to your personal information and correction of inaccurate or incomplete information. Depending on the lawful basis and circumstances, you may also ask for erasure, restriction of use or a portable copy, or object to processing. These rights have conditions and exceptions; for example, we may need to retain records to meet a legal duty.

Where we rely on consent, you can withdraw it at any time without affecting the lawfulness of earlier use. Where we rely on public task or legitimate interests, you may object on grounds relating to your circumstances. You can object to direct marketing at any time.

Contact the school or our DPO to exercise your rights. Requests can be made verbally or in writing and do not have to use a particular form. We may need proportionate evidence of identity or authority to protect

your information. We normally respond to a subject access request within one calendar month. Where the law allows clarification, an extension or an exemption, we will explain how this affects your request. School holidays do not automatically extend the deadline.

Personal information rights belong to the child as well as to parents in relation to their own information. A parent may act for a child where the child is not competent to act for themselves, or with the competent child's authority. We consider the child's understanding, wishes and interests before disclosing their information.

A parent's separate right to request an educational record depends on the school type and applicable education regulations. Where this statutory right applies, the response period is 15 school days. This is different from a UK GDPR subject access request.

Automated decisions

The school **does not carry out any solely automated decision-making** or profiling that results in legal or similarly significant effects on pupils, parents, or staff.

All decisions concerning admissions, educational support, grading, disciplinary actions, and safeguarding involve **human intervention and review** by qualified school staff.

Questions and complaints

If you are concerned about our use of personal information, contact the school or Global Policing Limited using the details on the first page. Our data protection complaints procedure is available via the school office – call 0161 224 6829. We will acknowledge a data protection complaint within 30 days, investigate appropriately, keep you informed and provide an outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office (ICO). Visit <https://ico.org.uk/make-a-complaint/> or call 0303 123 1113. The ICO normally expects you to give the organisation an opportunity to address your concern first.

Keeping this notice up to date

We review this notice regularly and when our use of information changes. We will bring material changes to your attention. Current notice: <https://www.st-agnes.manchester.sch.uk/page/privacy-notice/147025>
Next scheduled review: September 2027, or sooner if needed. Ask the school for an accessible format or help understanding this notice.

Optional photographs and publicity consent

School: **St Agnes CE Primary School**. This form records optional choices only. Refusing or withdrawing consent will not affect your child's education or access to school services.

Pupil name: _____ Class: _____

Parent or carer name: _____

Relationship to pupil: _____

Select Yes or No for each purpose. Leaving a choice blank means no consent for that purpose. Photographs may include video images. We will seek a separate choice for any materially different use. This form does not authorise facial recognition or biometric identification.

Use images in optional celebration displays inside the school, without a name. Yes ☐ No ☐

Add my child's first name to those internal celebration displays. Yes ☐ No ☐

Publish images on the school's public website, without a name. Yes ☐ No ☐

Add my child's first name to those website images. Yes ☐ No ☐

Publish images on the school's official social media accounts, without a name. Yes ☐ No ☐

Add my child's first name to those social media images. Yes ☐ No ☐

Use images in printed school prospectuses or publicity leaflets, without a name. Yes ☐ No ☐

Official social media accounts covered: **None**. Period covered: **N/A**. Online publication and printed-stock retention: **School website and prospectus**. We will ask separately before providing identifiable images or names to newspapers or other external publishers.

Public images can be viewed, copied or shared by others, including outside the UK. We control our own publications but cannot guarantee removal of copies made by others. To withdraw or change a choice, contact admin@st-agnes.manchester.sch.uk or call 0161 224 6829. We will stop future consent-based use and remove images from channels we control where reasonably possible; already distributed printed material may not be recoverable.

I confirm that I have parental responsibility or appropriate authority to make these choices. The school will take account of the child's views and ability to understand and make their own decisions. Permission to publish a name applies only where permission for the associated image has also been given.

Signature: _____ Date: _____

We retain evidence of your choices and any withdrawal in accordance with our retention schedule, for as long as necessary to manage and demonstrate those choices.