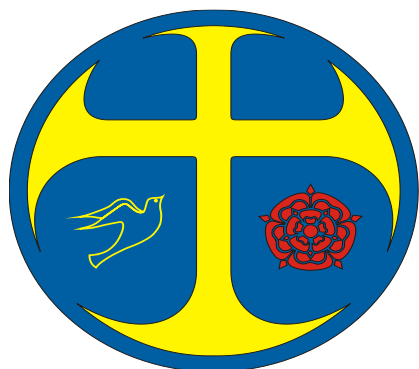


# All Saints' Catholic High School



*Luceat Lux Vestra*

## Information Governance Handbook

**Updated: Autumn 2019**

**To be reviewed: Autumn 2022**

**Responsibility of: School Business Manager**

**Approved by: Resources Committee**

### **Policy Approval:**

Mr. B McNally  
Headteacher  
06/11/2019

Mr. J Tomlinson  
Committee Chair  
06/11/2019



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Mission Statement

All Saints' is a school where the Catholic faith is taught, lived and celebrated.

We will educate the whole person  
spiritually, morally and intellectually.

We embrace Catholic values in all we do  
and in all our relationships.

We will identify and cater for the individual student's needs  
and prepare them for  
responsible participation in society.

Our aim is to follow Christ's teaching,  
as found in the Gospels,  
in everything we do.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Information Governance (Data Protection) Handbook

### Contents

1. Information Governance Policy
2. Roles and Responsibilities
3. Pupil and Family Privacy Notice
4. Workforce Privacy Notice (staff, volunteer personnel, students)
5. Third Party Privacy Notice
6. Consent Declarations
7. Data Audit
8. Data Processors Audit
9. Risk Assessment
10. Subject Access Request Record
11. Data Monitoring and Breach Record
12. Training Plan
13. Training Record
14. IRMS Toolkit for Schools.

This is a working document, and may be updated as additional information becomes available.

The master copy of this document will be maintained electronically by the School Business Manager.



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 1. Policy

### 1. Aims

Our school aims to ensure that all data collected about staff, pupils, parents, visitors and third parties is collected, stored and processed in accordance with the Data Protection Act (DPA) 1998, the General Data Protection Regulation (GDPR), the Data Protection Act (DPA) 2018, and with other relevant legislation.

This policy applies to all data, regardless of whether it is in paper or electronic format.

### 2. Legislation and guidance

This policy meets the requirements of the [Data Protection Act 1998](#), and is based on [guidance published by the Information Commissioner's Office](#) and [model privacy notices published by the Department for Education](#).

It also takes into account the provisions of the [General Data Protection Regulation](#) 2018 and Data Protection Act 2018.

In addition, this policy complies with regulation 5 of the [Education \(Pupil Information\) \(England\) Regulations 2005](#), which gives parents the right of access to their child's educational record.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Definitions

Term	Definition
<b>Personal data</b>	Data from which a person can be identified, including data that, when combined with other readily available information, leads to a person being identified. This includes written or verbal data, and imagery.
<b>Sensitive personal data</b>	Data such as: Racial or ethnic origin Political opinions Religious beliefs, or beliefs of a similar nature Where a person is a member of a trade union Physical and mental health Sexual orientation Whether a person has committed, or is alleged to have committed, an offence Criminal convictions
<b>Processing</b>	Obtaining, recording or holding data, verbally, manually or digitally
<b>Data subject</b>	The person whose personal data is held or processed, such as: <ul style="list-style-type: none"><li>• Pupils.</li><li>• Parents and Guardians.</li><li>• Governors.</li><li>• Employees or their families.</li><li>• Members of the public.</li><li>• Business partners.</li><li>• Local authorities or public bodies.</li></ul>
<b>Data controller</b>	A person or organisation that determines the purposes for which, and the manner in which, personal data is processed



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: office@allsaintshigh.lancs.sch.uk  
w: www.allsaintshigh.lancs.sch.uk

absence line: 01706 233 707  
absence email: attendance@allsaintshigh.lancs.sch.uk



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

<b>Data processor</b>	A person, other than an employee of the data controller, who processes the data on behalf of the data controller
<b>Information Commissioner's Office (ICO)</b>	The UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

## 4. Roles and responsibilities

The governing board has overall responsibility for ensuring that the school complies with its obligations under the Data Protection Act 1998.

Day-to-day responsibilities rest with the Headteacher, or the School Business Manager in the Headteacher's absence. The Headteacher will ensure that all staff are aware of their data protection obligations, and oversee any queries related to the storing or processing of personal data. Staff are responsible for ensuring that they collect and store any personal data in accordance with this policy. Staff must also inform the school of any changes to their personal data, such as a change of address.

The role of **Data Protection Officer** is assigned to the **School Business Manager**, Ms Cat Gillies.

The role of **DPO Link Governor** is to be assigned.

Further details are in the school's **statement of roles and responsibilities**.

## 5. The data controller

Our school processes personal information relating to pupils, staff and visitors, and, therefore, is a data controller. Our school delegates the responsibility of data controller to the **School Business Manager**. The school is registered as a data controller with the Information Commissioner's Office and renews this registration annually.

For more detail see the school's Roles and Responsibilities document.

## 6. Data protection principles

The Data Protection Act 1998 is based on the following data protection principles, or rules for good data handling:



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

- Data shall be processed fairly, lawfully and in a transparent manner in relation to individuals; the lawful basis can be:
  - Consent of a data subject
  - Processing is necessary for the performance of a contract with the data subject
  - Processing is necessary for compliance with a legal obligation (e.g. The Education Act 1996, School Standards and Framework Act 1998, Education Act 2002, Children and Families Act 2014)
  - Processing is necessary to protect the vital interests of the data subject or another person (e.g. life or death)
  - Processing is necessary for the performance of a task carried out in the public interest
- The lawful basis for sensitive personal data (racial, political, religious, trade union, genetic, health, sex life, criminal convictions or offences) is:
  - Explicit consent of the data subject
  - Processing is necessary for carrying out obligations under employment, social security or social protection law
  - Processing is necessary to protect the vital interests of a data subject or another individual where the data subject is physically or legally incapable of giving consent
  - Processing carried out by a not-for-profit body with a political, philosophical, religious or trade union aim provided the processing relates only to members or former members and provided there is no disclosure to a third party without consent
  - Processing relates to personal data manifestly made public by the data subject
  - Processing is necessary for the establishment, exercise or defence of legal claims or where courts are acting in their judicial capacity
  - Processing is necessary for reasons of substantial public interest
  - Processing is necessary for the purposes of preventative or occupational medicine, for assessing the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or management of health or social care systems and services
  - Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of healthcare and of medicinal products or medical devices
  - Processing is necessary for archiving purposes in the public interest, or scientific and historical research purposes or statistical purposes in accordance with Article 89(1)
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and, where necessary, kept up to date
- Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: office@allsaintshigh.lancs.sch.uk  
w: www.allsaintshigh.lancs.sch.uk

absence line: 01706 233 707  
absence email: attendance@allsaintshigh.lancs.sch.uk



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

- Processed in a manner that ensures appropriate security of the personal data against unauthorised processing, accidental loss, destruction or damage, using appropriate technical or organisational measures.

## 7. Privacy/fair processing notice

Further details are in the school's **Pupil & Family Privacy Notice, Workforce Privacy Notice, and Third Parties' Privacy Notice.**

## 8. Subject access requests

Under data protection legislation, parents and pupils have a right to request access to information the school holds about them. This is known as a subject access request.

To make a request for your personal information, or be given access to your child's educational record, contact **The School Business Manager, c/o All Saints' Catholic High School.**

Subject access requests should be submitted in writing, either by letter or email. Requests should include:

- The pupil's/ individual's name
- A correspondence address
- A contact number and email address
- Details about the information requested

The school will not reveal the following information in response to subject access requests:

- Information that might cause serious harm to the physical or mental health of the pupil or another individual
- Information that would reveal that the child is at risk of abuse, where disclosure of that information would not be in the child's best interests
- Information contained in adoption and parental order records
- Certain information given to a court in proceedings concerning the child

Subject access requests will be responded to within 1 month. The school may charge if more than one copy of the response or records are requested.

Following the ICO's guidance, if the school refuses a request, it will tell the individual why and that they have the right to complain to the supervisory authority and to a judicial remedy. We will do this without undue delay and at the latest, within one month.





# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

The school will follow the Information Commissioner's guidance ('Subject Access Code Of Conduct' and <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/right-of-access/>) in response to all subject access requests.

You also have the following rights:

- Right to be informed via a privacy notice.
- Right of rectification to incorrect data within 1 month.
- Right to erasure unless there is a legal reason for processing your data.
- Right to restrict processing to the bare minimum.
- Right to data portability to receive your data in the format you request.
- Right to object to personal data being used for profiling, direct marketing or research purposes.
- Rights in relation to automated decision making and profiling.

The school will ensure that these rights will be exercised.

## 9. Parental requests to see the educational record

As advised by the ICO (<https://ico.org.uk/for-the-public/schools/pupils-info/>) parents have the right of access to their child's educational record, free of charge, within 15 school days of a request.

Personal data about a child belongs to that child, and not the child's parents. This is the case even where a child is too young to understand the implications of subject access rights.

For a parent to make a subject access request, the child must either be unable to understand their rights and the implications of a subject access request, or have given their consent.

The Information Commissioner's Office, the organisation that upholds information rights, generally regards children aged 12 and above as mature enough to understand their rights and the implications of a subject access request. Therefore, most subject access requests from parents of pupils at our school may not be granted without the express permission of the pupil.

## 10. Storage of records

The school will securely store and process all data it holds, as detailed in our Risk Assessment.

Records will be stored and retained as detailed in the IRMS Information Management Toolkit for Schools.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 11. Disposal of records

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely.

For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of paper or electronic records.

## 12. Training

School personnel are provided with data protection training as part of their induction process. Data protection will also form part of continuing professional development, where changes to legislation or the school's processes make it necessary.

## 13. Risk assessment

The school has undertaken, and will regularly review, a risk assessment of its activities and identify those which are at most risk of resulting in a data breach. The school has then put control measures in place to manage the risks.

When considering introducing new systems the school will undertake a privacy impact assessment by following the ICO's guidance: <https://ico.org.uk/media/for-organisations/documents/1595/pia-code-of-practice.pdf> and <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-impact-assessments/>, and making use of their templates.

## 14. Data Breach

The school will establish monitoring procedures to detect, report and investigate a personal data breach, and will record the outcome of this monitoring. If a data breach is identified the school will follow the Information Commissioner's guidance: <https://ico.org.uk/for-organisations/report-a-breach/>



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

Following the identification of a breach, the school will

- record the incident in its Data Breach Record;
- undertake a review of its information governance risk assessments, and take steps to prevent a further occurrence of that nature;
- notify the affected data subjects;
- report the breach to the ICO within 72 hours from the discovery of the breach, unless the personal data breach is unlikely to result in a risk to the rights and freedoms of natural persons.

## 15. Monitoring arrangements

The **DPO and DPO Link Governor** are responsible for monitoring and reviewing this policy.

This document will be reviewed at least every **3 years**.

At every review, the policy will be shared with the governing board.

## 17. Links with other policies

- Information Governance handbook appendices.
- The freedom of information publication scheme.
- The IRMS Information Management Toolkit for Schools.
- Safeguarding Policy.
- Staff Code Of Conduct.
- Staff disciplinary and grievance policies
- Complaints policy.
- Whistleblowing policy.
- Security Policy.
- Online safety policy, and responsible use guidance.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 2. Roles and Responsibilities

### Introduction

The Data Protection Act (DPA) (1998) required any organisation that handled personal information about people comply with all data protection regulations. Since schools hold information on both staff and pupils, they are legally obliged to comply with the DPA's requirements.

From 25 May 2018, the General Data Protection Regulation (GDPR) replaced the DPA.

Processing data can involve collecting, editing, retrieving, storing, archiving, disclosing and destroying either electronic or hard copies.

Various roles exist within the data protection process.

### Data protection officers (DPOs)

All Saints' Catholic High School has appointed a DPO to oversee and monitor the school's data processing practises: **the School Business Manager**.

The school recommends the Governing Body nominate and appoint a **DPO Link Governor**, to monitor the school's information governance, and report to the board.

While the school can act as both the data controller and data processor, the data protection officer is a role that needs to be filled by either a new or existing member of staff. The main role of the DPO is to ensure that all school procedures comply with the requirements of data protection legislation in force at the time.

It should be noted that, when an employee is appointed as the DPO, there must be no conflict of interest. The GDPR states that the DPO will be appointed based on their professional qualities and expert knowledge of data protection law.

The DPO's knowledge of data protection law should be relevant to the type of data processing that is carried out within schools. They will need to understand the level of confidentiality that is required when processing individual pupils', staff members' and parents' personal information.

DPOs must work closely with the data controllers and processors, both of whom should provide the DPO with the necessary resources and information to fulfil their role. The data controllers and data processors must also ensure that the DPO is regularly involved with all issues regarding data protection at the school.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Data controllers

School managing boards (the Governing Body) are classed as the data controllers for all pupil, staff and parent data; therefore, it is not necessary to outsource a data controller.

As a data controller, there are rules that must be adhered to; these include the following:

- Processing personal data legally and fairly
- Data must only be collected for legitimate reasons and used accordingly
- Data collected must be relevant, adequate and not excessive in relation to the reason for its collection
- Data must be regularly updated to ensure accuracy
- If the data is incorrect, it must be possible to rectify, remove and block the information
- Any data that identifies an individual must not be kept longer than necessary
- Any personal information must be protected against accidental, unlawful destruction, alteration and disclosure – especially when processing over networks.

As the data controller, schools must implement appropriate security measures that ensure the correct level of protection for all data stored and processed.

Complaints can be sent to the data controller if any individual (pupil, staff member or parent) believes that their data has been compromised. If the individual feels that their complaint has not been handled to their satisfaction, they can forward it to the Information Commissioner's Office (ICO).

## Data processors

A data processor is any person who processes personal data on behalf of the data controller. Some data can be collected and used by the school; in this case, the school acts as both the data controller and processor; however, in some situations, schools will outsource their data to an external processor.

Examples of when data will be sent to an external processor include the following:

- Parent systems, such as text messaging, payments and bookings
- Information sent for statutory returns and exams
- Online curriculum software that requires pupil details
- Finance, employment, staff and governor records

These processing procedures are already taking place within schools, meaning that it is not necessary to employ new staff. The GDPR requires the data processor to comply with its regulations, with an obligation to maintain a record of all processing activities.

Processors are required to process any personal data under the controller's guidelines and should not dictate how data is managed; it is likely that specific instructions will be included in the data processing agreement.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

Under the DPA, the data controller had an obligation to ensure that data was handled correctly; however, under the GDPR, there are dual obligations on controllers and processors.

## **Data subjects**

The data subject is an individual who is the subject of personal data; their data is kept under the responsibility of data controllers and data processors.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 3. Pupil and Family Privacy Notice (How we use pupil information)

**The categories of pupil information that we collect, hold and share include (but are not limited to):**

- 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 conditions and information
- Special Educational Needs and Disability information
- Behaviour and exclusions
- Personal preferences (such as dietary preferences)
- Personal needs (such as hygiene procedures)
- Parent/ carer consent lists
- Family/ carer contact details and personal information (such as name, address, date of birth)
- Safeguarding and Child Protection records
- Relevant medical information given to us by parents and other third parties such as NHS Trusts, GPs and allied medical professionals (such as physiotherapists, occupational therapists, sight and hearing impaired professionals)
- Pupils' images
- Recordings of phone calls
- Pupil accounts and log-ins for IT systems.

### 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 promote the school
- to create security logs



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## The lawful basis on which we use this information

On the 25th May 2018 the Data Protection Act 1998 was replaced by the General Data Protection Regulation (GDPR). The conditions for processing under the GDPR are:

### 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 performance of a contract
  - (c) Processing is necessary for compliance with a legal obligation to which the controller is subject;
  - (d) To protect the vital interests of the data subject or of another person (such as providing contact and medical information for an emergency)
  - (e) For performance of a task carried out in the public interest or in exercise of official authority
  - (f) Necessary for the purposes of the legitimate interests

### Article 9

1. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or 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 shall be prohibited.
2. Paragraph 1 shall not apply if one of the following applies:
  - (i) 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 (Information about Individual Pupils) (England) Regulations 2013 - Regulation 5 'Provision of information by non-maintained special schools and Academies to the Secretary of State' states 'Within fourteen days of receiving a request from the Secretary of State, the proprietor of a non-maintained special school or an Academy (shall provide to the Secretary of State such of the information referred to in Schedule 1 and (where the request stipulates) in respect of such categories of pupils, or former pupils, as is so requested.'

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.





# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 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.

## Voluntarily provided data

Families are asked to voluntarily provide information including:

- Information about pupils' medical and dietary needs.
- Information about pupils' family and ethnic background.
- Pupil names and images for use in school promotion.
- Contact details for use in sharing information about pupils' learning – such as your email address.
- Information about your family background for the purpose of providing additional support to pupils in school.

## Storing pupil data

We hold pupil data for the length of time recommended by the 'IRMs Toolkit for Schools'.

## Who we share pupil information with

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- the Department for Education (DfE)
- our local authority (Lancashire County Council)
- other local authorities that pupils move into after leaving us
- Children's Social Care services (LCC and other local authorities that pupils move into after leaving us)
- Children and Family Wellbeing Service (LCC)
- Police (Lancashire, and other authorities that pupils move into after leaving us)
- Lancashire Probation Service
- NHS and school nurses, including Lancashire Care NHS Trust, University Hospitals of Morecambe Bay NHS Foundation Trust; Blackpool Fylde & Wyre NHS Trust and Virgin Care
- Lancashire Child, Adolescent Mental Health Service (CAMHS)
- School personnel, including staff, student teachers and volunteers
- Third party data processors systems that process or manage data on our behalf (such as home learning websites; SIMS.net who provide our data management system; CPOMS who provide our incident record system)
-



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 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



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

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 (make a 'Subject Access Request').

To make a request for your personal information, or be given access to your child's educational record, contact **The School Business Manager, c/o All Saints' Catholic High School**.

You also have the right to:

- have inaccuracies corrected
- have information erased
- prevent direct marketing
- prevent automated decision-making and profiling
- data portability

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/>.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693

f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)

w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707

absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Contact

If you would like to discuss anything in this privacy notice, please contact:  
**The School Business Manager, c/o All Saints' Catholic High School.**



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 4. Workforce Privacy Notice (How we use school workforce information)

**The categories of school workforce information that we collect, process, hold and share include (but are not limited to):**

- personal information (such as name, employee or teacher number, national insurance number, address, contact details)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- evidence of right to work in the UK
- background checks (including DBS check results, references from previous employers, qualification checks)
- work absence information (such as number of absences and reasons)
- qualifications (and, where relevant, subjects taught)
- relevant medical information
- emergency contact information
- appraisal/ performance management information
- image
- recordings of phone calls

### Why we collect and use this information

We use school workforce data to:

- to support personnel well being (such as by making provision for medical needs)
- to enable communication with personnel, or their emergency contact
- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid
- to create security logs and badges
- to safeguard staff and pupils
- to promote the school

### The lawful basis on which we process this information

On the 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:



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Article 6

2. Processing shall be lawful only if and to the extent that at least one of the following applies:
  - (g) Data subject has given consent
  - (h) Necessary for performance of a contract
  - (i) Processing is necessary for compliance with a legal obligation to which the controller is subject;
  - (j) To protect the vital interests of the data subject or of another person (such as providing contact and medical information for an emergency)
  - (k) For performance of a task carried out in the public interest or in exercise of official authority
  - (l) Necessary for the purposes of the legitimate interests

## Article 9

2. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or 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 shall be prohibited.
3. 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.

Education Act 2005 sections 113 and 114 - is a statutory requirement on schools and local authorities for the submission of the school workforce census return, including a set of individual staff records,

## Collecting this information

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

## Voluntarily provided data

Personnel are asked to voluntarily provide information including:

- Information about your medical and dietary needs.
- Information about your next of kin.
- Information about your family and ethnic background.
- Information about your family background for the purpose of providing additional support.
- Your name and images for use in school promotion.
- Your vehicle details.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Storing this information

We hold school workforce data for the length of time recommended by the "IRMS Toolkit for Schools".

## Who we share this information with

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- potential employers who request a recruitment reference
- other local authorities that personnel move into after leaving us
- Police (Lancashire, and other other authorities that personnel move into after leaving us)
- Third party data processors systems that manage data on our behalf (such as home learning websites; SIMS.net who provide our data management system; CPOMS who provide our incident record system; BTLS who provide our payroll service; OHAssist who provide our OH service.)

## Why we share school workforce information

We do not share information about 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 (DfE)

We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

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



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Data collection requirements

The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

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>.

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.

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>

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





# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Requesting access to your personal data

Under data protection legislation, staff have the right to request access to information about them that we hold (make a 'Subject Access Request'). To make a request for your personal information contact **The School Business Manager, c/o All Saints' Catholic High School.**

You also have the right to:

- have inaccuracies corrected
- have information erased
- prevent direct marketing
- prevent automated decision-making and profiling
- data portability

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/>.

## Contact

If you would like to discuss anything in this privacy notice, please contact:  
**The School Business Manager, c/o All Saints' Catholic High School.**



## 5. Third Parties Privacy Notice (How we use third parties' information)

**The categories of third parties' information that we collect, process, hold and share include (but are not limited to):**

- personal and contact details
- personal information (such as name, employee or teacher number, national insurance number, address, contact details)
- special categories of data including characteristics information such as gender, age, ethnic group
- contract information (such as start dates, hours worked, post, roles and salary information)
- payment information
- evidence of right to work in the UK
- background checks (including DBS check results, and references from previous employers, qualification checks)
- image
- recordings of phone calls

### Why we collect and use this information

We use third parties' data to:

- to provide a safe and effective learning environment for pupils
- to support the effective performance management contracts
- to facilitate safe recruitment
- to enable organisations to be paid
- to facilitate safe recruitment
- to allow better financial modelling and planning
- to enable ethnicity and disability monitoring
- to safeguard staff and pupils
- to create security logs and badges

### The lawful basis on which we process this information

On the 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:



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Article 6

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

- (m) Data subject has given consent
- (n) Necessary for performance of a contract
- (o) Processing is necessary for compliance with a legal obligation to which the controller is subject;
- (p) To protect the vital interests of the data subject or of another person (such as providing contact and medical information for an emergency)
- (q) For performance of a task carried out in the public interest or in exercise of official authority
- (r) Necessary for the purposes of the legitimate interests

## Article 9

3. Processing of personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or 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 shall be prohibited.

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

- (i) 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.

Education Act 2005 sections 113 and 114 - is a statutory requirement on schools and local authorities for the submission of the school workforce census return, including a set of individual staff records,

## Collecting this information

Whilst the majority of information you provide to us is mandatory (in order to fulfil a contract, or to safeguard pupils), some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

## Voluntarily provided data

Third parties' are asked to voluntarily provide information including:

- Information about your medical and dietary needs.
- Information about your next of kin.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

- Information about your family and ethnic background.
- Information about your family background, for the purpose of providing additional support.
- Your name and images for use in school promotion.
- Your vehicle details.

## Storing this information

We hold third parties' data for the length of time recommended by the "IRMS Toolkit for Schools".

## Who we share this information with

We routinely share this information with:

- potential employers who request a recruitment reference
- Police
- Third party data processors systems that manage data on our behalf (such as SIMS.net who provide our data management system; SIMS FMS our finance management system; Lancashire County Council's Accounts Payable team)

## Why we share third parties' information

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

## Requesting access to your personal data

Under data protection legislation, third parties have the right to request access to information about them that we hold (make a Subject Access Request'). To make a request for your personal information contact **The School Business Manager, c/o All Saints' Catholic High School.**

You also have the right to:

- have inaccuracies corrected
- have information erased
- prevent direct marketing
- prevent automated decision-making and profiling
- data portability



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

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/>.

## Contact

If you would like to discuss anything in this privacy notice, please contact:  
**The School Business Manager, c/o All Saints' Catholic High School.**



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 6. Sample declarations for data collection forms.

### Pupils

#### Declaration

I understand that information provided to the school will be securely recorded and handled in accordance with the Data Protection Act 1998, the General Data Protection Regulation 2018, and the Data Protection Act 2018.

I understand that the school holds the majority of its data on a mandatory basis (as required by law), and some which is voluntarily provided by the family (as explained in the school's Privacy Notices).

I understand that the school routinely shares information about children and families with external agencies, as detailed in the school's Privacy Notices, including: the Department for Education; Local Authorities; schools that children move to after leaving us; the NHS/ school nurse.

I understand that the school shares pupils' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

I understand that the school will not share information about pupils with anyone without consent, unless the law and its policies allow it to do so.

I give my consent for the school to hold the voluntarily provided information I give in this form and in the course of my child's education; to use it for the purpose of ensuring my child's wellbeing and providing my child's education, and to share it with appropriate third parties (as detailed in the school's Privacy Notices).

I understand that I have the right to withdraw this consent at any time.

For further information please see the school's Privacy Notices: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

Signed .....  
Name .....  
Relationship to child .....  
Date .....



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Adults

### Declaration

I understand that information provided to the school will be securely recorded and handled in accordance with the Data Protection Act 1998, the General Data Protection Regulation 2018, and the Data Protection Act 2018.

I understand that the school holds the majority of its data on a mandatory basis (as required by law), and some data which is voluntarily given.

I understand that the school will take my image for security use; for use in education activities, and for use in school promotion, and I give consent for this.

I understand that the school routinely shares information about its personnel with external agencies, as detailed in the school's Privacy Notices, including: the Department for Education; Local Authorities; potential employers; other local authorities; Police; third party data processors' systems that manage and process data on our behalf).

I understand that the school shares personnel data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

I understand that the school will not share information about staff with anyone without consent, unless the law and its policies allow it to do so.

I give my consent for the school to hold the voluntarily provided information I give in this form and in the course of my employment/ engagement with the school; to use it for the purpose of ensuring my wellbeing, and fulfilment of my contract of employment, and to share it with appropriate third parties, as detailed in the school's Privacy Notices.

I understand that I have the right to withdraw this consent at any time.

For further information please see the school's Privacy Notices: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

Signed .....  
Name .....  
Date .....



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 7. Data Audit

### Whose information do we hold?

Pupils and families (prospective, current and past)

Personnel (prospective, current and past staff, volunteers, visitors, students, agency staff/ third party staff)

Third parties (prospective, current and past contractors, suppliers)

### What do we hold?

#### Pupils

- 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 conditions and information
- Special Educational Needs and Disability information
- Behaviour and exclusions
- Personal preferences (such as dietary preferences)
- Personal needs (such as hygiene procedures)
- Parent/ carer consent lists
- Family/ carer contact details and personal information (such as name, address, date of birth)
- Safeguarding and Child Protection records
- Relevant medical information given to us by parents and other third parties such as NHS Trusts, GPs and allied medical professionals (such as physiotherapists, occupational therapists, sight and hearing impaired professionals)
- Pupils' images
- Recordings of phone calls
- Pupil accounts and log-ins for IT systems.





# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

**Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ**

**Headteacher: Mr B McNally, BSc (Hons), MA, NPQH**

## Staff

- Personal information (such as name, employee or teacher number, national insurance number, address, contact details)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Evidence of right to work in the UK
- Background checks (including DBS check results, and references from previous employers, qualification checks)
- Work absence information (such as number of absences and reasons)
- Qualifications (and, where relevant, subjects taught)
- Relevant medical information
- Emergency contact information
- Appraisal/ performance management information
- Image
- Recordings of phone calls

## Third parties

- Personal and contact details
- Personal information (such as name, employee or teacher number, national insurance number, address, contact details)
- Special categories of data including characteristics information such as gender, age, ethnic group
- Contract information (such as start dates, hours worked, post, roles and salary information)
- Payment information
- Evidence of right to work in the UK
- Background checks (including DBS check results, and references from previous employers, qualification checks)
- Image
- Recordings of phone calls



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Why do we hold it/ what do we do with it?

### Pupils

- 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 promote the school
- to create security logs

### Staff

- to support personnel well being (such as by making provision for medical needs)
- to enable communication with personnel, or their emergency contact
- to enable the development of a comprehensive picture of the workforce and how it is deployed
- to inform the development of recruitment and retention policies
- to enable individuals to be paid
- to create security logs and badges
- to safeguard staff and pupils
- to promote the school

### Third parties

- to provide a safe and effective learning environment for pupils
- to support the effective performance management contracts
- to facilitate safe recruitment
- to enable organisations to be paid
- to facilitate safe recruitment
- to allow better financial modelling and planning
- to enable ethnicity and disability monitoring
- to safeguard staff and pupils
- to create security logs and badges



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## **Who else processes it/ uses it on our behalf?**

See the Data Processors Audit.

## **Who do we share it with, and why?**

### Pupils

- Schools that the pupil's attend after leaving us
- The Department for Education (DfE)
- Our local authority (Lancashire County Council)
- Other local authorities that pupils move into after leaving us
- Children's Social Care services (LCC and other local authorities that pupils move into after leaving us)
- Children and Family Wellbeing Service (LCC)
- Police (Lancashire, and other authorities that pupils move into after leaving us)
- Lancashire Probation Service
- NHS and school nurses, including Lancashire Care NHS Trust.
- Third party data processors systems that manage data on our behalf (such as home learning websites; SIMS.net who provide our data management system; CPOMS who provide our incident record system.

### Staff

- Our local authority
- The Department for Education (DfE)
- Potential employers who request a recruitment reference
- Other local authorities that personnel move into after leaving us
- Police (Lancashire, and other authorities that personnel move into after leaving us)
- Third party data processors systems that manage data on our behalf (such as home learning websites; SIMS.net who provide our data management system; CPOMS who provide our incident record system; BTLS who provide our payroll service; OHassist who provide our OH service.)

### Third Parties

- Potential employers who request a recruitment reference
- Police
- Third party data processors systems that manage data on our behalf (such as SIMS.net who provide our data management system; SIMS FMS out finance management system; Lancashire County Council's Accounts Payable team)



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## Where do we hold it?

Data is kept in paper format across the school (including, but not limited to):

- Pupil files, attendance records, and financial records, are kept in locked cabinets in the locked SBM Office; Finance Office; General Office & KS4 Offices.
- Pupils' safeguarding files are kept in locked cabinets in the locked DSL Office.
- Pupils' SEN files are kept in the SENCO's office and in classrooms.
- Education records are kept in the relevant classrooms and staff offices.
- Personnel records are kept in locked cabinets in the locked SBM Office.
- Third parties' records are kept in locked cabinets in the SBM & finance offices.
- Electronic records are kept on the school servers, in a secure server cupboard.
- **Electronic records may also be stored on school-owned laptops'/ tablets; iPads; USB storage devices and secure cloud services (e.g. Office 365 One Drive or Outlook).**
- Electronic data may – but should not – be stored on personal devices such as unsecured personal laptops and data storage devices.
- Electronic data is stored on servers of third-parties' who process data on our behalf, including home learning websites; SIMS.net who provide our data management system; CPOMS who provide our incident record system; BTLS who provide our payroll service; OHAssist who provide our OH service.

## How do we retain/ archive/ dispose of it?

Data which is archived will be appropriately packaged and labelled with its disposal date, and will be kept in a designated, locked, space (under the stage).

Records will be stored and retained as detailed in the IRMS Information Management Toolkit for Schools.

Personal information that is no longer needed, or has become inaccurate or out of date, is disposed of securely, by, for example, shredding or incinerating paper-based records, and overriding electronic files. We may also contract to a reputable outside company to safely dispose of paper or electronic records.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: office@allsaintshigh.lancs.sch.uk  
w: www.allsaintshigh.lancs.sch.uk

absence line: 01706 233 707  
absence email: attendance@allsaintshigh.lancs.sch.uk



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 8. Data Processors Audit (including, but not limited to):

Data processor/ Software/ App	Access via PC, laptop, Ipad?	What data is held	Who uses it	Why / Purpose of use
SIMS.net	All admin-networked computers	All census-required pupil and personnel data	Admin staff, teachers, education support staff; IT Engineer; BTLS support service.	Management system for data collection, storage and reporting
Finance 6	All admin-networked computers	Supplier info & some staff who are reimbursed – bank a/c details, address & email address	Admin staff; Head; LCC SFS officers; IT Engineer; BTLS support service.	Manage school budget & facilitate payments to suppliers
Office 365 One Drive and Outlook	Internet connected devices	User created content, and documents from the school servers	All staff and governors	Secure storage of documents for off-site access.
School's Portal	Internet connected devices	User's names, email addresses, preferences. School's emergency contacts full contact details. Data for pupils applying to and from our school. Pupil's FSM status. SEN details.	All staff and governors, different access rights	Communication between local authority and school



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

CPOMS	Internet connected devices	Staff names and email addresses. Pupil's names, dates of birth, pupil characteristics, contacts' details, and all recorded personal incidents.	All staff, different levels of access.	Recording pupil and family incidents
LCC	Documentation, servers, web platforms.	Full records of pupils', personnel and governors.	Staff and contractors	Employer
BTLS	Documentation, servers, web platforms.	Personal characteristics, contract and payroll records of staff.  Contact and financial records of debtors and creditors.	Staff and contractors	Payroll provider
Oracle	Internet connected devices	Staff name, DOB, address, contact details, payroll and contract details.	All staff have user accounts. SBM and Head have administrator access.	Communication with BTLS payroll provider
OH Assist	Documentation, servers, web platforms.	Staff name, DOB, address, contact details, contract and medical details.	Staff and contractors	Occupational Health provider
OH Assist website	Internet connected devices	Staff name, DOB, address, contact details, contract and medical details.	SBM and Head have administrator access.	Communication with OH Assist



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

**Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ**

**Headteacher: Mr B McNally, BSc (Hons), MA, NPQH**

School website	Internet connected devices	Images of pupils who have given consent. Pupils' first names. Staff names. Governors' names and post details.	Public user access. Network manager has admin access.	School communication and promotion.	
----------------	----------------------------	--	--	-------------------------------------	--



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 9. Risk Assessment

Identified risk	Management strategy
Storage of data	<p>Paper-based records and portable electronic devices, such as laptops and hard drives, that contain personal information are kept under lock and key when not in use.</p> <p>Papers containing confidential personal information should not be left on office and classroom desks, on staffroom tables or pinned to noticeboards where there is general access.</p> <p>The school will encourage a 'clear desk/ clear pigeon hole' policy whereby sensitive data is removed and locked away when not in use, and pigeon holes are regularly emptied.</p> <p>Staff to make use of lockable cabinets in classrooms for storage of sensitive data.</p> <p>Passwords that are at least 8 characters long containing letters and numbers should be used to access school computers, laptops and other electronic devices. As relevant, staff and pupils are reminded to change their passwords at regular intervals.</p> <p>Encryption software should be used to protect all portable devices and removable media, such as laptops and USB devices.</p>
Access to secure data on the school network.	<p>Staff will be provided with individual log ins to the school's computer network, and will be responsible for the security of this log in. Staff must not share log ins.</p> <p>Non-staff personnel will be given lower-level access to the computer network and IT systems.</p>





# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

<p>Staff accessing secure data (e.g. through email or CPOMS) on unsecured or personal devices.</p>	<p>Staff, pupils or governors who store personal information on their personal devices are expected to follow the same security procedures for school-owned equipment.</p> <p>The onus is on staff to ensure the security of school data accessed on personal devices.</p> <p>Instead of using a portable data storage device, staff may choose to use Office 365 cloud storage options, which will keep the information safe.</p> <p>Remember that if staff are accessing school information (through a portable storage device, or through Office 365 cloud or emails, CPOMS, etc) on a personal device (personal laptop/ iPad/ phone) staff are responsible for ensuring its security.</p> <p>Staff must ensure that any devices used for accessing school data are secure – e.g. having encryption (or at least a strong password) on a phone, or having encryption on their laptop.</p> <p>Be especially wary of allowing personal devices to save their passwords for accessing school data (e.g. their Office 365 password), as this removes a layer of security.</p> <p>Staff should not download and save school data onto an unencrypted device, and must ensure that any downloaded data/files are securely deleted.</p>
<p>Staff taking personal information out of school, e.g. staff taking planning home; DSL taking information to a meeting.</p>	<p>Personal information may only be taken off site (in paper or electronic form) by approved personnel (such as the DSL, when attending a CSC meeting).</p> <p>The onus is on staff to ensure that documents taken off site are stored securely, and not exposed to undue risk – for example by being left in a car boot, or on a table at home when third parties are in proximity.</p> <p>The same precautions must be taken with data as when within the school.</p>
<p>Sending secure data to print on an open-access device.</p>	<p>Staff are expected to either send to a printer they are in physical proximity to and can supervise.</p>



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



**Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ**

**Headteacher: Mr B McNally, BSc (Hons), MA, NPQH**

Leaving secure data on a printer.	Staff are expected to print and collect documents straight away, and to store them securely.
Disposal of secure data	Staff are expected to make use of the 'confidential' shredding bags to dispose of any documents containing sensitive data. Personal information that is no longer needed, or has become inaccurate or out of date, will be disposed of securely. For example, we will shred or incinerate paper-based records, and override electronic files. We may also use an outside company to safely dispose of electronic records.
Secure data that is in use in school (e.g. notes in diaries, pupil pictures on wall displays) may be seen by third parties.	The school will vet third party contractors who come onto site, and ensure they read our school induction.  Visitors, such as families, who come into school will be escorted by staff, to ensure they do not take pictures of, or remove, sensitive data.  When school is closed, blinds on windows and doors will be shut to prevent access to secure data.
Transferring sensitive data manually or digitally	Staff will ensure that they take all reasonable steps to ensure the protection of data they are transferring.  Before sharing data staff will take steps to ensure they have the right to share it, and gain consent if necessary.  Sensitive documents being transferred in person will be handed to the named recipient.  Documents being transferred by third party will be by means of a reputable, tracked courier service, such as Royal Mail or Parcelforce.  Staff will take all reasonable efforts to ensure that the information is addressed correctly and accurately, and is enveloped/ wrapped appropriately.  Data being transferred digitally will be by means of an encrypted data storage device (e.g. USB stick), or by encrypted email, or encrypted website (e.g. the DfE S2S website).  Staff will take steps to ensure the accuracy of the recipient's address before sending.



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



**Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ**

**Headteacher: Mr B McNally, BSc (Hons), MA, NPQH**

	Emails sent to third parties will be sent BCC so that email addresses are not disclosed.
Sending sensitive information to families – e.g. letters; pupil information forms.	<p>Sensitive information should only be communicated to the relevant recipient, not passed through third parties (unless the recipient has given specific consent, for example for use of an interpreter).</p> <p>Documentation containing sensitive information should only be handled by responsible members of staff, who should hand it directly to the named recipient.</p> <p>Documentation may alternatively be sent to the named recipient by a reputable courier service, such as Royal Mail or Parcelforce.</p> <p>Staff will take all reasonable efforts to ensure that the information is addressed correctly and accurately, and is enveloped/ wrapped appropriately.</p>
Sharing pupil names within the school community – e.g. publishing names in a show programme.	School staff must request consent to share pupils' first names with external parties, such as organisers of events happening in school or in show programmes.
Promotion of the school making use of individuals' names and images.	School staff must request consent to share pupils' first names with external parties, such as organisers of events happening in school or in show programmes.
Third parties' use of the premises.	<p>A note to lettings policies and agreements to explain expectations to lessee.</p> <p>Vet potential lessees before agreeing use.</p> <p>Data within school to be secured as described above.</p>



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 10. Subject Access Request Record

Date received	
Deadline to respond (receipt plus 1 calendar month)	
Request from (contact's name)	
Request regarding (subject's name)	
Correspondence address, contact email and telephone number	
Information/ action requested	
Action taken/ SAR refused (what/ why/ who by/ when)	
Date response provided to family	
Further information	



# ALL SAINTS' CATHOLIC HIGH SCHOOL



t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)

Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 11. Data Monitoring and Data Breach Record

<b>Date of monitoring?</b>	
<b>Who undertaking monitoring?</b>	
<b>Area inspected?</b>	
<b>Findings?</b>	
<b>Actions required, and due date?</b>	

<b>Date of review?</b>	
<b>Who undertaking monitoring?</b>	
<b>Area inspected?</b>	
<b>Findings?</b>	
<b>Further actions required, and due date?</b>	



# ALL SAINTS' CATHOLIC HIGH SCHOOL

t: 01706 213 693  
f: 01706 831 137

e: [office@allsaintshigh.lancs.sch.uk](mailto:office@allsaintshigh.lancs.sch.uk)  
w: [www.allsaintshigh.lancs.sch.uk](http://www.allsaintshigh.lancs.sch.uk)

absence line: 01706 233 707  
absence email: [attendance@allsaintshigh.lancs.sch.uk](mailto:attendance@allsaintshigh.lancs.sch.uk)



Haslingden Road Rawtenstall Rossendale Lancashire BB4 6SJ

Headteacher: Mr B McNally, BSc (Hons), MA, NPQH

## 12. Training Plan

Initial:

Via a reputable online training portal.

Ongoing:

Re-read and sign the Handbook/ repeat e-learning module.

## 13. Training Record

(See separate records.)

## 14. IRMS Toolkit For Schools:

<https://irms.org.uk/page/SchoolsToolkit>