Information Policy

Policy title:	Information Policy
Function:	For information and guidance about information held by The Blue Coat School. This document forms part of the portfolio of policies designed to inform students and parents, staff and the general public.
Status:	Approved
Statutory guidance:	Freedom of Information Act 2000 Protection of Freedoms Act 2012 UK GDPR Data Protection Act 2018 DfE Protection of Biometric Information of Children in Schools and Colleges (July 2022) Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers (current edition) Keeping Children Safe in Education 2026 Working Together to Safeguard Children 2026 Relevant guidance and codes of practice issued by the Information Commissioner's Office (ICO)
Audience:	Students, Parents, Staff, Leaders, Trustees, General public
Ownership:	Board of Trustees/Headteacher
Last reviewed:	26 September 2026
Reviewed by:	Board of Trustees
Next reviewed:	Bi-annually

Content

Title	Page No
Aims and objectives	3
Roles and Responsibilities	3
Procedures and Practices	4
Monitoring, Review and Evaluation	11
Annex A: Data protection officer	12
Annex B: Privacy notice (Students of the school)	13
Annex C: Privacy notice (Parents of the school)	17
Annex D: Privacy notice (Workforce of the school)	19
Annex E: Privacy notice (Associates of the school)	22
Annex F: Overview of Information management framework	24
Annex G: Information management framework for teams	25
Annex H: Information published on the school's website	26
Annex I: Statutory requirements for policies and documents	28
Annex J: How to ask for more information	30
Annex K: Acknowledgement of freedom of information request	31
Annex L: Acknowledgement of subject access request	32
Annex M: Conclusion of freedom of information and subject access requests	33
Annex N: Exam-Specific Data Protection Requirements	34

Aims and objectives

At The Blue Coat School Liverpool, every student belongs, is valued, and is empowered to thrive. Guided by Non Sibi Sed Omnibus — not for oneself but for all — we honour our story with honesty while forging a modern, inclusive future.

We celebrate individuality and champion diversity, inspiring students to flourish in their own way with confidence, curiosity, resilience, and kindness.

Our vision is to ignite ambition and nurture integrity and compassion, preparing young people to shape a fairer, brighter world — in Liverpool and beyond.

This policy sets out how The Blue Coat School manages information that it holds. It covers information that is presently held and information that will be held in the future.

Through this policy, The Blue Coat School will comply with all statutory requirements, guidance and advice about the collecting, storage, protection and sharing of information.

This policy is intended to provide proactive guidance to all members of the school community and the general public about the types of information the school handles and how it handles that information appropriately.

Roles and responsibilities

The Board of Trustees will ensure this policy:

- meets the statutory requirements of information handling, information sharing, the protection of information and the freedom of information
- is maintained and reviewed regularly.
- Receive annual assurance regarding the school's filtering and monitoring arrangements.
- Ensure filtering and monitoring systems are reviewed at least annually and take account of risks associated with generative artificial intelligence.
- Seek assurance that safeguarding information-sharing arrangements remain compliant with statutory guidance.
- Ensure staff are appropriately trained in information sharing, online safety and data protection requirements.
- Record formally how the Board has assured itself that information management and safeguarding information-sharing arrangements comply with current statutory expectations.

The Headteacher will ensure that:

- the school has a named data protection officer (Annex A)
- all information required and used by the school is updated regularly
- all information required and used by the school is appropriately protected
- information that the school holds about others is only shared with third parties after consent or as required by law
- there are clear and easy to understand process to manage freedom of information and subject access requests.

The Data Protection Officer (DPO) will ensure that:

- the school workforce is informed and advised about their obligations to comply with data protection laws
- the school monitors compliance with data protection laws.

Middle Leaders will:

- work with Senior Leaders to identify if their team is responsible for managing information
- work within school frameworks to ensure that processes to manage information are compliant and regularly reviewed.

Staff will:

- report low-level concerns about adults to the DSL. All concerns will be logged, reviewed and escalated if necessary. This aligns with safer working practices and the staff code of conduct.

The school will:

- quality assure all alternative provision placements and verify safeguarding checks for contractors and third party providers.

All staff at The Blue Coat School will ensure they have read this policy and have due regard to the principles of handling, sharing, and protecting information they use in their day to day roles.

Procedures and practices

Definitions

For the purposes of this policy:

- 'Information' is used to describe words, data or pictures that provide details about an individual
- 'Protection' is used to describe the measures taken to restrict the sharing of information
- 'School information' is used to describe information about the school which does not identify or give any information away about an individual
- 'Personal information' is used to describe any information which may be sensitive or used on its own or with other pieces of information to identify, contact or locate an individual

This policy applies to all members of The Blue Coat School community. Throughout this policy:

- 'Students' is used to describe any individual who is on the school roll
- 'Parents' is used to describe any adult who has parent, guardian or carer responsibility for a student at the school
- 'Staff' is used to describe any individual who is part of the school workforce. This includes those employed by the school, those who give up their time voluntarily for the school or those who provide contracted services to the school
- 'Associates of the school' is used to describe any individual who has expressed interest in remaining in contact with the school.

What information will we collect, use, process and hold?

The school will collect, use, process and hold personal information about the following groups within the school community:

- students
- parents
- workforce (employees, volunteers and trustees)
- associates of the school.

The school will handle and manage information relating to students':

- achievement and progress
- personal development, behaviour and welfare
- place of residence
- contextual and background information
- medical conditions, allergies, Individual Healthcare Plans (IHPs), medication requirements and associated risk assessments

The school will handle and manage information about parents':

- place of residence
- contact details
- preferences relating to some aspects of their child's education
- other personal information as required on a case by case basis to support students' welfare and development.

The school will handle and manage information about its workforce (employees, volunteers and trustees):

- place of residence
- contact details
- other personal information required to ensure safe and supportive engagement with the school.

The Liverpool Blue Coat School enjoys a wide and varied school community and is committed to ensuring good communication with all associates of the school. To support this aim, the school will keep contact details of:

- trustees of The Liverpool Blue Coat School Foundation
- members of The Liverpool Blue Coat School Olds Blues
- alumni of the school.

The school will provide privacy notices to ensure that each of the above groups (Annex B - E) are pro-actively informed about the information it collects, uses and shares to fulfil its aims and duties.

All safeguarding decisions must include a written rationale and be stored securely. Confidentiality will be maintained in line with GDPR and KCSIE, Annex C.

What principles will guide how we handle information?

The Blue Coat School is committed to requesting, securely handling, safely managing and appropriately sharing relevant information that is required to fulfil its purpose as an educational establishment.

The school will use an information management framework (Annex F - G) to consistently record and review key school information management processes across all relevant teams.

Teams that are responsible for handling information will use this framework to ensure compliance with data protection law and review and update their processes annually. Teams will be clear about:

- What information they hold?
- When information is gathered and refreshed?
- What is the lawful basis for holding that information?
- How was consent to hold that information sought (if necessary)?
- Where the information is held?
- How the information is used?
- How the information is kept secure?
- How long the information is retained?
- How all of the above will be communicated to appropriate groups within The Blue Coat School community?

Very occasionally, other information about individuals will be brought to the school's attention. The school will make careful decisions about the need to retain, handle, manage or share any other information that is brought to its attention. Such decisions will be guided by:

- Statutory requirements
- The law
- The extent to which information supports the aims of the school.

The school will engage with the Cyber Choices programme to educate students on lawful online behaviour and prevent cybercrime involvement. The school will conduct annual cyber risk assessments, comply with DfE cyber security standards and implement appropriate filtering and monitoring systems. Staff and students will be supported to understand emerging online harms, including risks associated with deepfakes, image sharing, pornography, misogynistic online content and generative artificial intelligence technologies. Information management arrangements will support the school's wider safeguarding responsibilities in these areas.
The school recognises that digital technologies, including generative artificial intelligence, present both opportunities and safeguarding risks. Information systems, cyber security controls, filtering and monitoring arrangements will be reviewed regularly to mitigate online safety risks, support the identification of safeguarding concerns and comply with current statutory guidance. Trustees will receive annual assurance regarding the effectiveness of these arrangements.

Information sharing for safeguarding will follow the updated 'Seven Golden Rules'. Consent is not required when sharing information to protect a child. Decisions must be documented with clear rationale. Information sharing decisions will follow current statutory safeguarding guidance, recognising that effective safeguarding depends upon timely, lawful and proportionate information sharing. Where concerns relate to the safety or welfare of a child, consent may not be required. Decisions, rationale and actions taken will be recorded appropriately. Where a pupil transfers to another educational setting, safeguarding information will be shared securely and without delay. Child protection records will include sufficient context regarding concerns, support arrangements, vulnerabilities and identified risks to support safe transition planning and continuity of safeguarding support.

The protection of information

The Blue Coat School acknowledges that it holds a wide variety of public and personal information to fulfil its educational purposes. The school is fully committed to ensuring that personal information is:

- collected with care

- stored securely
- processed appropriately
- accessed appropriately.

Information that will be protected because it is deemed as personal includes but is not restricted to:

- Information about students':
  - education and welfare
  - personal details
- Information about parents':
  - personal details
- Information about employees:
  - performance, conduct and welfare
  - personal details
- Information about Trustees or associates of the school:
  - personal details.

It is necessary to share the personal information of a student, parent, member of the workforce or associate with key teams within the school. This will always be explained to students, parents, member of the workforce or associates of the school through the school's privacy notices.

The sharing of sensitive information will always be undertaken with the appropriate restricted access and in the strictest confidence.

Very occasionally, it may be necessary to share the personal information of a student, parent or a member of the school workforce with a third-party organisation. In such cases The Liverpool Blue Coat School will always act in the interests of:

- the welfare of its students', parents', member of the workforce or associate of the school
- other organisations who are responsible for the safeguarding of children or adults
- the law.

The sharing of information

The Blue Coat School recognises its responsibility to handle information appropriately. The school will always make careful decisions about what information may be shared with others.

When making decisions about the sharing of information, The Liverpool Blue Coat School classifies information using the following categories:

- Information openly available to the public (School information)
- Information privately available to individuals (Personal information).

The school will be guided by this policy when making decisions about the sharing of school information. The Blue Coat School classifies this information according to the following categories:

- information that we commit to sharing publically:
  - statutory information about the school's leadership, provision and outcomes (Annex H)
  - statutory information about the school's policies and practices (Annex I)
  - non-statutory information in the public interest of the school community

- information that we may consider sharing publicly:
    - any information about school provision as part of a freedom of information request (See freedom of information section)
- information that we will not consider sharing publicly:
    - the personal information of students, parents, members of the workforce or associates of the school
    - any information that can be used to identify individuals
    - any information about the school that Trustees deem not to be in the public interest.

The Blue Coat School will ensure that school information is always available on the school's website. Where an interested party cannot find the information they seek, we advise that they contact the school to be signposted to that information (Annex J).

The school will use this policy when making decisions about the sharing of personal information. This information is classified according to the following categories:

- information about an individual that we commit to sharing privately with that individual:
    - Information about student's personal development, behaviour, welfare, attendance, learning and achievement
    - the personal information of student, parents, members of the workforce and other associates of the school
- information about an individual that we may consider sharing privately with that individual:
    - information that the school receives about an individual from other organisations
    - any other information about an individual that is requested by that individual as part of a subject access request (See subject access request section)
- information that we will not share privately:
    - information that identifies another individual as part of a subject access request
    - information that identifies any individual as part of a freedom of information request.

Individuals may make additional requests for information including:

- Freedom of information requests – where an interested party requests more information about school provision
- Subject access requests – where a member of the school community requests to see information that the school holds about them.

The processes for these are set out in the next two sections.

Freedom of information requests

The Blue Coat School will be guided by statutory requirements when making decisions about the sharing of school information.

Information which the school is obliged to automatically publish is set out above in the section about the sharing of information.

This section of the policy deals with how the school will handle additional requests for school information from members of the public.

The Liverpool Blue Coat School will ensure that the principles of freedom of information relate to all recorded information that the school holds.

Anybody can make a freedom of information request. To assist requests The Blue Coat School has provided a named contact (Annex J) so that requests are handled efficiently and effectively. Applicants should clearly mark their request as 'freedom of information request'.

Upon receiving a freedom of information request in writing, The Blue Coat School will:

- Assess the scope of the request
- Acknowledge receipt of the request (Annex K) and inform the applicant about:
    - whether the school holds that information
    - whether the school needs further clarity about the request
    - whether the school deems it necessary to charge a fee for the request
    - whether the school believes the request should be refused because it is an unreasonable burden on its resources
    - what timeframe the school hopes to provide the information by (usually 1 month)
- Collate the information requested and in doing so:
    - identify all known information within the scope of the request
    - select the most reasonable format to supply the information
- Write to the applicant (Annex M) and provide the information requested ensuring that the correspondence sets out what:
    - the scope of the request was
    - information has been provided
    - what the applicant should do if they are dissatisfied with the information provided.

The Blue Coat School will always try to provide information without any charge. Where the request for information requires significant printing, photocopying or use of human resources beyond usual practice, we will assess the cost of the request and share that cost with the interested party before progressing the request. In such cases the school will await receipt of the appropriate fee before collating and sending the information.

The Blue Coat School will always carefully consider whether a request for information should not be progressed under freedom of information. Such cases will include, but are not limited to:

- Exceptions relating to other legislation that are dealt with under their own processes such as Subject Access Requests or Environmental Information Requests
- Exemptions as defined by the ICO relating to instances where the release of information is deemed not appropriate.

The Blue Coat School will always provide individuals with information about what they can do if they are dissatisfied with the school's response to a freedom of information request. In such cases, the applicant will be signposted to the school's complaints procedure.

Subject Access Requests

The Blue Coat School will be guided by statutory requirements when making decisions about the sharing of personal information about an individual.

In the vast majority of cases, information which the school holds about individuals will automatically be shared privately with those individuals as set out above in the section about the sharing of information.

This section of the policy deals with how the school will handle additional requests (subject access requests) for personal information from members of the school community.

The Blue Coat School will ensure that the principles of data protection are carefully considered when dealing with subject access requests.

Anybody can make a subject access request. To assist requests The Blue Coat School has provided a named contact (Annex J) so that requests are handled efficiently and effectively. Applicants should clearly mark their requests as a 'subject access request'.

Under subject access requests, individuals are:

- entitled to have access to their own personal information
- not entitled to have unrestricted access to documents that may contain their own personal information.

Upon receiving a subject access request in writing, The Blue Coat School will:

- Assess the scope of the request
- Acknowledge receipt of the request (Annex L) and inform the applicant about:
    - what information the school holds
    - whether the school needs further clarity about the eligibility of the individual to make the request or further clarity about who the request relates to
    - whether the school believes the request should be refused under guidance issued by the ICO
    - what timeframe the school hopes to provide the information by (usually 1 month with scope to extend by up to 2 more months if necessary)
- Collate the information requested and in doing so:
    - identify all known information within the subject of the request
    - select the most reasonable format to supply the information
- Write to the applicant (Annex M) and provide the information requested ensuring that the correspondence sets out:
    - the subject of the request
    - the information that the school has been able to provide
    - what the applicant should do if they are dissatisfied with the information provided.

The Blue Coat School will provide information relating to subject access requests without any charge.

There are circumstances under which it is legitimate to withhold subject access. These may be described as request that are manifestly unfounded or excessive. The Blue Coat School will always carefully consider whether it is appropriate for subject access request to be progressed using guidance from the ICO.

The Blue Coat School will always provide applicants with information about what they can do if they are dissatisfied with the school's response to a subject access request. In such cases, the applicant will be signposted to the school's complaints procedure.

Monitoring, review and evaluation

The school will review information that is shared publicly on an at least an annual basis to ensure it meets statutory requirements.

The school will annually review, evaluate and update their practices and processes for the handling of personal information.

The school will keep a record of all requests for information (FOI and SAR) and use it to monitor and evaluate how effectively it pro-actively and reactively shares information.

The Board of Trustees will be availed of the necessary information to rigorously review and evaluate the effectiveness of the principles of this policy.

Annex A: Data protection officer

Data protection officer:
Mrs Lisa Hayburn – Staff and School Operations Manager

Annex B: Privacy notice (Students of the school)

What information do we collect?

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

- personal information such as name, unique pupil number, photograph and address
- characteristics such as welfare, ethnicity, language, nationality, country of birth and free school meal eligibility
- attendance information such as sessions attended, number of absences and absence reasons
- biometric fingerprint recognition for catering payments and secure building access
- financial information for school bursary payments such as bank account
- information for school catering such as records of meals purchased
- information necessary to process school trips, events and activities such as passport details
- password and network activity where access is granted
- cctv footage when present on school premises and within the vicinity of cameras.

Why we collect and use this information?

We use student information to:

- support admission to the school
- support students' learning
- support the safety, security and welfare of the school community
- monitor, support and report on students' progress
- provide appropriate pastoral care
- assess the quality of our services
- comply with the law regarding data sharing.

What is the lawful basis on which we use this information?

Under the General data protection Regulations, the lawful bases we rely on for processing student information are:

- legal
- protection of vital interest
- legitimate interest

Is this information requested on a mandatory or voluntary basis?

Whilst the majority of student information we collect and use 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 students whether they are required to provide certain student information to us or if they have a choice in this.

How do we store this information?

We hold student information in both electronic and manual formats in secure databases and storage systems.

How long do we hold this information for?

We hold information relating to students who have been admitted the school until the student reaches the age of 25.

Information held relating to student applicants who have not been admitted will be held for a period of 12 months.

CCTV footage is held for a period of 30 days unless an incident occurs which may require footage to be retained for longer.

Is this information shared with any other parties?

We routinely share student information with:

- parents
- schools that the students attend after leaving us
- relevant local authorities
- The Department for Education (DfE)
- agencies that support the safety and welfare of students
- external cctv camera monitoring company

Why do we share student information?

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

We share students' data with the 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 students with the DfE under regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.

Live CCTV footage is shared for security, safety and welfare purposes.

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.

Youth support services

Students aged 13+

Once our students reach the age of 13, we may also pass student information to our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- Youth support services
- Careers advisers

A parent or guardian can request that **only** their child's name, address and date of birth is passed to their local authority or provider of youth support services by informing us. This right is transferred to the child / student once he/she reaches the age 16.

Students aged 16+

We will also share certain information about students aged 16+ with our local authority and / or provider of youth support services as they have responsibilities in relation to the education or training of 13-19 year olds under section 507B of the Education Act 1996.

This enables them to provide services as follows:

- post-16 education and training providers
- youth support services
- careers advisers

For more information about services for young people, please visit our local authority website.

National Pupil Database

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 students 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 Students) (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 students from the NPD with third parties who promote the education or well-being of children in England by:

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

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

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

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

For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

For information about which organisations the department has provided student information to, (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

What is the process for requesting access to your personal data?

Under data protection legislation, you have the right to request access to information about you that we hold or be given access to your child's education record. To make a request for your personal information, contact the Headteacher's PA at the school address. You also have the right to:

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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance.

If you are dissatisfied with our response to your concern, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Annex C: Privacy notice (Parents of the school)

What information do we collect?

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

- personal contact details
- communications between home and school
- information about how we can support parental access to the school
- cctv footage when present on school premises and within the vicinity of cameras

Why we collect and use this information?

We use the parent information to:

- support the admission, education, security and welfare of their child
- involve parents in the academic, pastoral and social development of their child
- enable communication between home and school
- assess the quality of our services
- comply with the law regarding data sharing

What is the lawful basis on which we use this information?

Under the General Data Protection Regulations, the lawful bases on which rely for processing information for general purposes are:

- legal
- protection of vital interest

Is this information requested on a mandatory or voluntary basis?

Whilst the majority of parent 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 parent information to us or if you have a choice in this.

How do we store this information?

We hold information about parents in both electronic and manual formats in secure databases and storage systems.

How long do we hold this information for?

We hold parent information on their child's school record until the child reaches the age of 25.

Cctv footage is held for a period of 30 days unless an incident occurs which may require footage to be retained for longer.

Is this information shared with any other parties?

We routinely share parent information with:

- The Department for Education
- outside agencies that are supporting the welfare needs of their child
- External cctv camera monitoring company

Why do we share parent information?

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

We share parents' data with the Department for Education (DfE) on a statutory basis. This data sharing underpins school funding and educational attainment policy and monitoring.

Live cctv footage is shared for security, safety and welfare purposes.

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.

What is the process for requesting access to your personal data?

Under data protection legislation, you have the right to request access to information about you that we hold or be given access to your child's education record. To make a request for your personal information, contact the Headteacher's PA at the school address. You also have the right to:

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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance.

If you are dissatisfied with our response to your concern, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Annex D: Privacy notice (Workforce of the school)

What information do we collect?

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

- personal information such as name, employee, teacher and national insurance numbers, address
- special data categories including characteristics such as gender, age, ethnic group
- contract information such as employment eligibility, start dates, hours worked, post, roles, salary and pension information
- biometric fingerprint recognition for catering payments and secure building access
- other employment/volunteer related information such as performance management, qualifications and, where relevant, subjects taught and voluntary work
- welfare information such as absence and occupational health reports
- cctv footage when present on school premises and within the vicinity of cameras
- password and network activity where access is granted

Why do we collect and use this information?

We use the information to:

- support recruitment, ongoing employment and welfare needs
- enable the development of a comprehensive picture of the workforce and how it is deployed and developed
- inform the development of recruitment and retention approaches for both the paid and voluntary workforce
- enable individuals to be paid
- support the safety, security and welfare of the school community
- undertake necessary statutory registrations

What is the lawful basis on which we process this information?

Under the General Data Protection Regulations, the lawful bases on which we rely on for processing information for general purposes are:

- contractual (paid and unpaid workforce)
- protection of vital interest

Is this information requested on a mandatory or voluntary basis?

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 the General Data Protection Regulation, we will inform you whether you are required to provide certain school workforce information to us or if you have a choice in this.

How do we store this information?

We hold information about the school workforce in both electronic and manual formats in secure databases and storage systems.

How long do we hold this information for?

The majority of information about the school workforce will be held for a period of 6 years after the termination of employment contracts.

Biometric fingerprint recognition information is deleted when you no longer use the system including when your employment is terminated or when you withdraw consent.

Information relating to network access and activity will be deleted on termination of employment.
CCTV footage is retained for 30 days unless an incident occurs which may require footage to be retained for longer.

Is this information shared with any other parties?

We routinely share this information with:

- The Department for Education
- payroll administrators
- HMRC
- pensions departments
- external cctv camera monitoring company

Why do we share school workforce information?

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

We share payroll information to ensure individuals receive payment and employer obligations are met for tax and pension arrangements.

Live cctv footage is shared for security, safety and welfare purposes.

We are required to share information about our workforce with the Department for Education on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation and links to school funding / expenditure and the assessment of educational attainment.

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

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

What is the process for requesting access to your personal data?

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher's PA at the school address. You also have the right to:

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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance.

If you are dissatisfied with our response to your concern, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Annex E: Privacy notice (Associates of the school)

What information do we collect?

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

- Contact information (such as contact details)
- Demographic information (like age, profession)
- Financial information (such as standing order details and gift aid declarations)
- Cctv footage when present on school premises and within the vicinity of cameras

Why we collect and use this information?

We use the information to:

- Keep you up to date with news, events and information about The Blue Coat School which we think will be of interest to you.
- Carry out research on the demographics, interests and behaviour of our alumni and supporters to help us gain a better understanding of them.

What is the lawful basis on which we use this information?

Under the General Data Protection Regulations, the lawful bases on which rely for processing information for general purposes is consent and protection of vital interest.

Is this information requested on a mandatory or voluntary basis?

The information you provide to us is provided on a voluntary basis. In order to comply with the General Data Protection Regulation, we will not share your data with any undisclosed organisations.

How do we store this information?

We hold information about associates in a secure database provided by a secure external party.

How long do we hold this information for?

We hold information about associates for as long as they would like it to be held.

Cctv footage is retained for a period of 30 days unless an incident occurs which may require footage to be retained for longer.

Is this information shared with any other parties?

We do not share information about associates of the school with any other organisation without consent unless the law and our policies allow us to do so.

Live cctv footage is shared for security, safety and welfare purposes.

Why do we share information about associates?

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

What is the process for requesting access to your personal data?

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the Headteacher's PA at the school address.

You also have the right to:

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

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance.

If you are dissatisfied with our response to your concern, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/

Annex F: Overview of Information management framework

Aspect	Key questions	Admin team	Stakeholder Engagement	Estates team	Finance team	Ict team	Management support
Designated responsible officer	Who has day to day responsibility for the data?						
Information held	What data do we hold? Who does the data belong to?						
Lawful basis	Consent? Contractual req? Legal obligation? Protection of vital interest? Public interest? Legitimate interest?						
Method of consent	How is it sought? When? How often?						
Privacy notice	Do we use a privacy notice? How is it shared?						
Place of storage	Who holds the information? (School/Other) Where is the information held? What format is it held in?						
Data partners	Do we rely on any 3rd parties? Who?						
Processing activities	How is the data used? How often? For what purposes?						
Control measures	Who has access to the data? How are they permitted to access it?						
Security measures	What internal measures are in place to keep the data secure? What external measures are in place to keep the data secure?						
Data breach measures	What measures will be instigated if there is a data breach? Who will we commincate with? How? How will a data breach be followed up?						
Refresh period	How often is the data refreshed? How?						
Retention period	How long will we retain this data for? Why?						

Annex G: Information management framework for teams

Aspect	Key questions	Data set 1	Data set 2	Data set 3	Data set 4
Designated responsible officer	Who has day to day responsibility for the data?				
Information held	What data do we hold? Who does the data belong to?				
Lawful basis	Consent? Contractual req? Legal obligation? Protection of vital interest? Public interest? Legitimate interest?				
Method of consent	How is it sought? When? How often?				
Privacy notice	Do we use a privacy notice? How is it shared?				
Place of storage	Who holds the information? (School/Other) Where is the information held? What format is it held in?				
Data partners	Do we rely on any 3rd parties? Who?				
Processing activities	How is the data used? How often? For what purposes?				
Control measures	Who has access to the data? How are they permitted to access it?				
Security measures	What internal measures are in place to keep the data secure? What external measures are in place to keep the data secure?				
Data breach measures	What measures will be instigated if there is a data breach? Who will we commincate with? How? How will a data breach be followed up?				
Refresh period	How often is the data refreshed? How?				
Retention period	How long will we retain this data for? Why?				

Annex H: Information published on the school's website

As set out in the school information regulations (2012), the following information will always be available through the school's website and will be updated from time to time to reflect changes to what is required:

1. The name, postal address and telephone number of the school, and the name of a person to whom enquiries should be addressed.

2. Either:
   (a) the determined admission arrangements for the school in relation to each relevant age group at the school, including any arrangements for selection, any oversubscription criteria and an explanation of the process of applying for a school place;
   (b) information as to where and by what means parents may access that information in the local authority's composite prospectus published on their website.

3. Information as to where and by what means parents may access the most recent report about the school published by her Majesty's Chief Inspector of Education, Children's Services and Skills.

4. Where relevant, the school's most recent key stage 2 results as published by the Secretary of State in the School Performance Tables, to include the following information:
   (a) percentage of pupils achieving the expected standard in reading, writing and mathematics;
   (b) average progress in reading;
   (c) average progress in writing;
   (d) average progress in mathematics;
   (e) percentage of pupils achieving a high level of attainment in reading, writing and mathematics;
   (f) average scaled score in reading; and
   (g) average scaled score in mathematics.

5. Where relevant, the school's most recent key stage 4 results as published by the Secretary of State in the School Performance Tables, to include the following information:
   (a) progress 8 score;
   (b) attainment 8 score;
   (c) percentage of pupils achieving a good pass in English and mathematics; and
   (d) percentage of pupils achieving the English Baccalaureate.

6. Information as to where and by what means parents may access the School Performance Tables published by the Secretary of State on the Department for Education's website.

7. The following information about the school curriculum:
   (a) in relation to each academic year, the content of the curriculum followed by the school for each subject and details as to how additional information relating to the curriculum may be obtained;
   (b) in relation to key stage 1, the names of any phonics or reading schemes in operation; and
   (c) in relation to key stage 4, a list of the courses provided which lead to a GCSE qualification and a list of other courses offered at key stage 4 and the qualifications that may be acquired.

8. The measures determined by the head teacher under section 89 of the Education and Inspections Act 2006.

9. In respect of the school's pupil allocation of Pupil Premium Grant ("the pupil premium allocation"):
    (a) for the previous academic year:
        i. how the pupil premium allocation was spent; and
        ii. the impact of that expenditure on eligible and other pupils; and
    (b) a statement as to the school's strategy in respect of the pupil premium allocation for the current academic year ("pupil premium strategy"):
        i. the amount of the school's pupil premium allocation;
        ii. a summary of the main barriers to educational achievement faced by eligible pupils of the school;
        iii. how the pupil premium allocation is to be spent to address those barriers and the reasons for that approach;
        iv. how the school is to measure the impact and effect of its expenditure of the pupil premium allocation; and
        v. the date of the school's next review of its pupil premium strategy.

10. The report prepared by the school under section 317(5)(a) of EA 1996 (duties of Trustees in relation to special educational needs (4)).

11. The school's charging and remissions policy determined by them under section 457 of EA 1996(5).

12. A statement of the school's ethos and values.

13. The school's complaint procedures.

14. The school's 16 to 18 results, identified as such, in the information published by the Secretary of State in the School Performance Tables, under the following categories:
    (a) progress;
    (b) attainment;
    (c) English and mathematics progress;
    (d) retention;
    (e) destinations.

Annex I: Statutory requirements for policies and documents

As set out in Statutory policies for schools and academy trusts (DFE 2022), Board of Trustees of academies are required to hold each of the policies and documents outlined below. The following table provides transparency about where each of the following information sources is held by The Blue Coat School:

Policy or documents required	**Location**	**Further details**
Admissions	School website	Admission policy
Careers guidance and programme	School website	Policies
Charging and remissions	School website	Charging and remissions policy
Data protection	School website	Information policy
Protection of biometric information	School website	Information policy
Register of pupil' admission to school and attendance	Held in school	Headteacher
School information published on website	School website	Listed for completeness in information policy
School complaints	School website	Complaints policy
Capability of staff	School website	Staff capability policy
Early Career Teachers	School website	ECT Policy
Staff discipline, conduct and grievance	School website	Staff professional conduct policy
Single central record of recruitment and vetting checks	Held in school	Director of resources
Statement of procedures for dealing with allegations of abuse against staff	School website	Safeguarding/Child Protection policy, Staff Conduct policy
Accessibility plan	School website	Accessibility policy
Child protection policy and procedures	School website	Safeguarding policy
Children with health needs who cannot attend school	School website	Send policy
Special educational needs and disability	School website	Send policy
Supporting pupils with medical conditions	School website	Send policy, Supporting Pupils with Medical Conditions policy and Allergy & Anaphylaxis policy
Relationships and Sex Education	School website	RSE Policy
Behaviour in schools	School website	Behaviour policy
School exclusion	School website	Behaviour policy

Health and safety	School website	Health and safety policy
Instrument of Government	School website	Statutory information
First aid in schools	School website	Health and safety policy
Premises management documents	Held in school	H&S coordinator, ~~Facilities~~ Estates manager
Equality information and objectives	School website	Equality policy
Register of business interests of Headteachers and Trustees	School website	Clerk to Trustee records

Annex J: How to ask for more information

Where an interested party cannot find the information they seek or wishes to request further information, we advise that they contact the school using the following details:

Name:	Lisa Hayburn, Staff and School Operations Manager
Address:	The Blue Coat School, Church Road, Wavertree, Liverpool, L15 9EE
Telephone:	0151 733 1407
Email:	Via Headteacher's PA k.crute-jain@bluecoatschool.org.uk

Annex K: Acknowledgement of freedom of information request

This template should be used to acknowledge and respond to freedom of information requests.

Dear [Name]

Re: Freedom of information request

We acknowledge receipt of your Freedom of Information request [details of request].

We are currently reviewing your request and will begin the process of gathering the relevant information. In accordance with the legislation, we will respond to your request within one calendar month of receipt, which is by [date].

Should we require any further information to verify your identity or clarify your request, we will contact you promptly.

Yours sincerely

Annex L: Acknowledgement of subject access request

This template should be used to acknowledge and respond to subject access requests.

Dear [Name]

Re: Subject Access Request

We acknowledge receipt of your subject access request [details of request].

We are currently reviewing your request and will begin the process of gathering the relevant information. In accordance with the legislation, we will respond to your request within one calendar month of receipt, which is by [date].

Should we require any further information to verify your identity or clarify your request, we will contact you promptly.

Yours sincerely

Annex M: Conclusion of freedom of information and subject access requests

This template should be used to communicate the conclusion of freedom of information and subject access requests

Dear [Name]

Re: [Freedom of information request / Subject Access Requests]

I write in response to the data subject access request you made on [DATE].
If we do not hold the required information:
After conducting a reasonable search for records relating to your access request, we have determined that [we do not process personal data about you ***OR*** we have destroyed, erased or made your personal data anonymous in accordance with our record retention obligations and practices]. You have a right to lodge a complaint with the Information Commissioner or seek a judicial remedy if you are dissatisfied with this response. You can find details for the UK Information Commissioner at ico.org.uk.

If we hold information but cannot disclose it due to exemptions:

We are unable to provide you with a copy of the personal data you requested because;
Delete as appropriate

- the data amounts to mixed personal data with a third party who has not consented to its disclosure to you, and we believe it is not reasonable to disclose it to you in the absence of their consent;
- the personal data is protected by legal privilege;
- [consider if management forecasting or negotiation is applicable in the case];
- we have destroyed, erased or made your personal data anonymous in accordance with our record retention obligations and practices.

If we are providing all the copy data:
After conducting a reasonable search for records relating to your access request, we have confirmed that we process your personal data. In response to your request, we are enclosing a copy of the personal data we process about you. Redaction have been made if a document is being provided which contains some of your personal data, but the rest of the information is not within the scope of the right of access that you have.

If we are providing some but not all of the copy data:
After conducting a reasonable search for records relating to your access request, we have confirmed that we process your personal data. In response to your request, we are enclosing a copy of some of the data we process about you. We are unable to provide a copy of some of the personal data you requested because it is exempted from disclosure for the following reasons:

1. [Insert applicable exemption or schedule 2 Data Protection Act 2018]

Redactions have been made if a document is being provided which contains some of your personal data, but the rest of the information is not within the scope of the right of access that you have, or to execute an exemption.

You have a right to lodge a complaint with the Information Commissioner or seek a judicial remedy if you are dissatisfied with this response. You can find details for the UK Information Commissioner at ico.org.uk.

For more information on how we handle personal data please refer to our Information Policy on the school website.

Yours sincerely,
[Name of sender]
[Job Title]

Annex N: Exam-Specific Data Protection Requirements

This annex supplements the Updated Information Policy by incorporating key requirements from the Data Protection Policy (Exams). It ensures compliance with JCQ regulations, UK GDPR, and the Data Protection Act 2018 for all examination-related processes.

1. JCQ COMPLIANCE

All exam administration must comply with JCQ General Regulations for Approved Centres and Suspected Malpractice Policies.

2. CANDIDATE CONSENT

Candidates requiring access arrangements must sign the JCQ GDPR-compliant consent form before applications are processed.

3. MALPRACTICE HANDLING

Candidates involved in suspected malpractice will be informed that their personal data may be shared with awarding bodies, regulators, and professional bodies.

4. HARDWARE AND SOFTWARE SECURITY

All IT systems used for exams must be password-protected, regularly updated, and monitored for unauthorized access. Secure drives and encrypted data transfer methods must be used.

5. DATA RETENTION PERIODS

Exam-related records will follow the retention schedule outlined in the Exams Archiving Policy. Typical retention: 12 months for seating plans, 6 years for results and certificates.

6. PUBLISHING RESULTS

Results will be published in accordance with ICO guidance. Candidates may request that their results are not published. Requests must be considered on a case-by-case basis.

7. SUMMARY TABLE OF EXAM-RELATED RECORDS

Type of Record	Storage	Protection	Retention
Exam Entries	Secure MIS	Password-protected	Until certification
Access Arrangements	Secure drive	Restricted access	12 months
Seating Plans	Locked cabinet	Physical security	12 months
Scripts	Awarding body	Secure transfer	As per JCQ
Results	MIS	Password-protected	6 years
Certificates	Secure cabinet	Restricted access	6 years