



## Privacy Notice for Parents and Pupils How we use your information 2023/24

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### Who are we?

Park Hill Thorns Federation is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes.

Thorns Community Infant School and Park Hill Junior School are registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: Thorns Community Infant School Z4903647 and Park Hill Thorns Federation School Z3194413.

You can contact the school as the Data Controller in writing at:

Thorns Community Infant School  
Blackthorn Road  
Kenilworth  
Warwickshire  
CV8 2DS

[admin2307@welearn365.com](mailto:admin2307@welearn365.com)

Park Hill Junior School  
Parkfield Drive  
Kenilworth  
Warwickshire  
CV8 2JJ

[admin2309@welearn365.com](mailto:admin2309@welearn365.com)

### What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our pupils and parents.

### What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information 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.

### What personal information do we process about pupils and parents?

The pupil and parent information that we collect, hold and share includes:

- Personal information including a pupil's name, date of birth, gender, unique pupil number and home address, dietary needs, method of transport to arrive at school and



Executive Head: Mrs Liz Bradbury

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Thorns t: 01926 853875 e: [admin2307@welearn365.com](mailto:admin2307@welearn365.com)

email address (given by the school).

- Characteristics such as ethnicity, language, nationality, country of birth, religion, adoption and free school meal eligibility
- Attendance information such as sessions attended, number of absences and absence reasons.
- Educational information including records of work, assessment results, relevant medical information, details of pupils' special educational needs, exclusions/behavioural information, previous school/nursery details and further education.
- Contact information for parents, carers, doctors and other relatives, including telephone numbers, home addresses, e-mail addresses and relationships to these people.
- Information about a child's home life, where required as part of necessary safeguarding and welfare processes.
- Details of any support received, including care packages, plans, and support providers.

We may also collect, use, store and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Any medical conditions we need to be aware of, including physical and mental health
- Photographs captured in school
- Characteristics, such as ethnic background or special educational needs

## Why do we use personal information?

We use pupil data:

- to support pupil learning
- to monitor and report on pupil progress
- to provide appropriate pastoral care
- to protect pupil welfare
- to assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- to share medical information with health professionals
- administer admissions waiting lists
- carry out research

## Use of yours or your child's personal data for marketing purposes

Where you have given us consent to do so, we may send you or your child marketing information by email or text promoting school events, campaigns, charitable causes or services that may be of interest to them.



You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by contacting us (see 'Contact us' below).

### **Use of your child's personal data in automated decision making and profiling**

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

### **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 UK 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.

Most of the data we collect in relation to parents and pupils will come direct from the parent or pupil. However, we may also hold data relating to you and/or your child that has come from:

- Local authorities
- Government departments or agencies
- Police force, courts, tribunals
- External support services

### **What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. The lawful reasons we have for processing personal information are as follows:

#### **1) To comply with the law**

We collect and use general purpose pupil information in order to meet certain legal requirements and legal obligations placed upon the school by law. We therefore are required to this process personal information for such purposes even if you have not consented to us doing so.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the school in writing.

#### **2) To protect someone's vital interests**



We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

### 3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information processed is in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

### 4) To perform a public task

It is a day-to-day function of the school to ensure that children receive the education and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that pupils are properly educated and supported

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

### Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Processing relates to personal data which is manifestly made public by the data subject
- 3) Necessary for establishing, exercising or defending legal claims
- 4) Necessary for reasons of substantial public interest
- 5) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your child's life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you



- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

## Who might we share your information with?

We routinely share pupil information with:

- schools that the pupils attend after leaving us
- our local authority
- the Department for Education (DfE)
- Public Health Team and other public health agencies
- School nurse (Compass)
- NHS
- Information Management software: SIMS, Synergy, Wonde, O track, EVOLVE, Tapestry, SCR Tracker, CPOMS
- Education/classroom apps: Times Table Rockstars, Mathletics, 123 Maths, Spelling frame, Pearson Activities
- Conference software for homework, home learning and meetings: Zoom, Microsoft Teams, Loom

We do not share information about our pupils or parents unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

## 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 do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The school monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

We have security measures in place to prevent yours and your child's information from being accidentally lost, used, or accessed in an authorised way, altered, or disclosed.

## How long do we keep your information for?

In retaining personal information, the school complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under



which the school are required to retain the information.

A copy of those schedules can be located using the following link:  
<http://irms.org.uk/page/SchoolsToolkit>

### Transferring data internationally

Where we transfer personal data to a country outside of the UK, we will do so with the appropriate safeguards in place in accordance with data protection law.

### What are your rights with respect of your personal information?

Under data protection law, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or to have access to your child's educational record, contact the school data protection contact or the School Data Protection Officer at Warwickshire Legal Services via email at [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk) or alternatively;

School Data Protection Officer  
Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
Market Square  
Warwick  
CV34 4RL

**\*\*Please ensure you specify which school your request relates to.**

In certain circumstances where Park Hill Thorns Federation processes data for the purposes of legitimate interests or to fulfil their public task, individuals have a right to object to the processing where it is likely to cause, or is causing, harm or distress. When exercising this right, individuals should contact the school/academy trust to inform them of their reasons for their objection. Park Hill Thorns Federation will consider the reasons for any objection and assess the risk to the individual against the purposes for the processing. In the event Park Hill Thorns Federation is unable to comply with an objection, we will ensure we can demonstrate compelling legitimate grounds to continue with the processing.

Where Park Hill Thorns Federation processes your information with your consent, you have the right to withdraw your consent at any time. To exercise this right, please contact Park Hill Thorns Federation at [admin2307@welearn365.com](mailto:admin2307@welearn365.com) for Thorns or [admin2309@welearn365.com](mailto:admin2309@welearn365.com) for Park Hill.

You also have the right to:

- prevent processing for the purpose of direct marketing;



# Park Hill Thorns Federation

Successful, confident learners.  
Responsible, compassionate individuals.

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Thorns Community



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- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

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

## Review

The content of this Privacy Notice will be reviewed annually.

Date reviewed: 26/05/2023

Date of next review: July 2024



**Table 1 - Personal information we are required to process to comply with the law:**

Information Type	Relevant legislation	Special Category- additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Admissions Register	Education (Public Registration) (England) Regulations 2006	Religion Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task)  Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Department for Education  Local Authority  Future Educational Establishments	Legal Obligation
Attendance Register and Attendance Information and School Attendance Order	Education (Public Registration) (England) Regulations 2006 Education Act 1996		Department for Education  Local Authority  Future Educational Establishments	Legal Obligation
Common Transfer File	Education (Public Registration) (England) Regulations 2006	Religion Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task)	Department for Education  Local Authority  Future Educational Establishments	Legal Obligation





		Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)		
Curricular and Educational Record	Education (Public Registration) (England) Regulations 2006	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)  Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task)	Department for Education  Local Authority  Future Educational Establishments	Legal Obligation
Education Supervision Order	Children's Act 1989		Local Authority  Next Educational Establishment	Legal Obligation
Exclusion (and Suitable Education)	Education Act 1996 and 2002		Local Authority  Next Educational Establishment	Legal Obligation
Information relating to the school or provision of education of pupils	Education Act 2005	Health (5 Necessary for the preventive or occupational medicine or for reasons of	Ofsted	Legal Obligation



		Public Task in the area of public health)  Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task		
Pupil Information	Education (Public Registration) (England) Regulations 2006 Education Act 1996	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)  Religion/ Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task	Department for Education  Local Authority  Future Educational Establishments	Legal Obligation
Qualifying Complaint	Education Act 2005		Ofsted	Legal Obligation
Safeguarding and Promoting the Welfare of Pupils	Education Act 2002, Children's Act 1989 and 2004	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Department for Education  Local Authority  Warwickshire MASH (includes Police, Warwickshire County Council,	Legal Obligation



		Religion/ Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task	NHS and social services and any other key partner agencies).  Next Educational Establishment	
Special Educational Needs and SEN Report	Education (Public Registration) (England) Regulations 2006 Education Act 1996	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Department for Education  Local Authority  Future Educational Establishments	Legal Obligation
Suitable Education for Illness	Education Act 1996	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Local Authority  Next Educational Establishment	Legal Obligation
Suitable Education (Not received for any other reason)	Education Act 1996		Local Authority  Next Educational Establishment	Legal Obligation
Single Central Register	Keeping Children Safe In Schools		SCR Tracker	Legal Obligation



**Table 2** - Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Name, Date of Birth, Gender, Medical Condition, Address, Emergency Contact Details	Health and Religion (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	NHS  Compass (School Nurse)  Police  Next Educational Establishment  EVOLVE (Educational Visits Software).	Vital Interest
Name, Class, Allergy	Health and Religion (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Educaterers	Vital Interest
Name, Class, Medical Condition	Health and Religion (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Supply Teachers	Vital Interest
Name, Date of Birth, Gender, Address, Telephone	Health (5 Necessary for the preventive or occupational	Warwickshire County Council Health and Safety	Legal Interest



Number	medicine or for reasons of Public Task in the area of public health)		
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**Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'**

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
<b>Image related consent</b>			
Pupil Image,		Braiswick - Photographers School Website School Newsletter Media - Local Newspaper, Radio Twitter Facebook Instagram	Consent
Class Name		Braiswick - Photographers School Website School Newsletter Media - Local Newspaper, Radio Twitter Facebook Instagram	Consent
Christian Name		School Website School Newsletter Media - Local Newspaper, Radio	Consent
Year Group		School Website School Newsletter Media - Local Newspaper, Radio Twitter Facebook Instagram	Consent
<b>Specific Consent - this will be requested if we ask your child to see one of these organisations</b>			
Pupil Name		Snowford Grange Counselling Service	Consent



		Educational Psychologist Integrated Disability Service SEND Supported LLP Early Help	
Date of Birth		Snowford Grange Counselling Service Educational Psychologist Integrated Disability Service SEND Supported LLP Early Help	Consent
Class		Snowford Grange Counselling Service Educational Psychologist Integrated Disability Service SEND Supported LLP	Consent
Year Group		Snowford Grange Counselling Service Educational Psychologist Integrated Disability Service SEND Supported LLP	Consent
Medical Information	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	Educational Psychologist Integrated Disability Service Early Help	Consent
Academic Achievement		SEND Supported LLP Early Help	Consent
SEN		SEND Supported LLP Early Help	Consent
Parent Details		Early Help	Consent



**Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task**

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Pupil Name		Parent Pay TT Rockstar Mathletics Showme.com 123 Maths Spelling Frame Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis SIMS CPOMS Parent Mail Educaterers Compass (School Nurse) Department for Education Warwickshire School Finance EVOLVE O Track Public Health and other public health agencies Standards Testing Agency (Department for Education)	Public Task
Gender		TT Rockstar Mathletics SIMS CPOMS Parent Mail Compass (School Nurse) Department for Education O Track	Public Task



		Public Health and other public health agencies Tapestry	
Year Group		Parent Pay TT Rockstar Mathletics Spelling Frame Tapestry SIMS CPOMS Parent Mail Cool Milk Educaterers Compass (School Nurse) EVOLVE Department for Education Warwickshire School Finance O Track Public Health and other public health agencies Standards Testing Agency (Department for Education)	Public Task
Class		Parent Pay Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rugby, Tennis SIMS CPOMS Parent Mail Cool Milk Educaterers Compass (School Nurse) Department for Education EVOLVE O Track	Public Task





		Standards Testing Agency (Department for Education)	
Free School Meal Eligibility		Parent Pay Tapestry SIMS CPOMS Cool Milk Department for Education O Track	Public Task
Date of Birth		Parent Pay TT Rockstar Mathletics Tapestry SIMS CPOMS Parent Mail Cool Milk Compass (School Nurse) Department for Education O Track Standards Testing Agency (Department for Education)	Public Task
Parent Name		Parent Pay Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rugby, Tennis SIMS CPOMS Parent Mail Cool Milk Compass (School Nurse) Department for Education Public Health and other public health agencies SCR Tracker	Public Task



		EVOLVE	
Address		Parent Pay Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis SIMS CPOMS Parent Mail Compass (School Nurse) Department for Education	Public Task
Contact phone number		Parent Pay Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis SIMS CPOMS Parent Mail Compass (School Nurse) Department for Education Public Health and other public health agencies	Public Task
Contact email address		Parent Pay Tapestry After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis SIMS CPOMS Parent Mail Compass (School Nurse) Department for Education Public Health and other public health	Public Task



		agencies	
UPN		Tapestry Department for Education O Track SIMS CPOMS	Public Task
English as an additional language	Ethnicity (1 Explicit consent of the data subject)	Tapestry SIMS CPOMS Department for Education O Track	Public Task
Medical Information	Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)	After School Clubs eg Sewing Club, Archery, Football, Tag Rugby, Tennis SIMS CPOMS Compass (School Nurse) Department for Education Public Health and other public health agencies	Public Task
Dietary Needs		Educaterers SIMS	Public Task
Religion	Religion/ Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task	Department for Education SIMS	Public Task
Academic Achievement		Department for Education O Track SIMS	Public Task
SEN Status		Warwickshire School Finance Department for Education O Track SIMS	Public Task



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Volunteer Name	CPOMS	Public Task
	Evolve SCR Tracker	