



## Privacy Notice for Parents and Pupils How we use your information 2022/23

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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 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.

## 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 assess the quality of our services
- to comply with the law regarding data sharing
- to safeguard pupils
- dietary requirements
- To keep the school community safe and well

## 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.

## 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.



Executive Head: Mrs Liz Bradbury

Park Hill t: 01926 855974 e: [admin2309@welearn365.com](mailto:admin2309@welearn365.com)

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

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.

In certain circumstances where the school processes data to fulfil their public task, an individual has the right to object to any processing where it is likely to cause or is causing harm or distress. To exercise this right, individuals should do so by contacting the school to inform them of their reasons for the objection. These reasons should relate to your specific circumstances. Upon receipt of an objection, the school will consider the reasons for the objection and balance this against the legitimate grounds to process data.

## 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 Task
- 5) Necessary for preventive or occupational medicine, or for reasons of Public Task in the area of public health
- 6) Necessary for archiving, historical research or statistical purposes in the Public Task

The lawful reasons for each type of special category personal information data that we process is set out in the tables attached.

### 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
- NHS Test and Trace
- Information Management software: SIMS, Synergy, Wonde, O track, EVOLVE, Tapestry
- Education/classroom apps: Times Table Rockstars, Mathletics, 123 Maths, Showme, Spelling frame
- 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>.

### Covid-19 - Data Collection Requirements

It may be necessary for us to share limited information with the Department of Public Health if an individual tests positive for Coronavirus, or if there is a Coronavirus outbreak. This will enable the named agencies to liaise with families to provide advice and support, and to take appropriate steps to respond to an outbreak.

### 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).



## 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.**

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; 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/>



# Park Hill Thorns Federation

Successful, confident learners.  
Responsible, compassionate individuals.

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Thorns Community



## Review

The content of this Privacy Notice will be reviewed July 2023.



**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<br>Ethnicity<br>(6 Necessary for archiving, historical research or statistical purposes in the Public Task)<br><br>Health<br>(5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health) | Department for Education<br><br>Local Authority<br><br>Future Educational Establishments | Legal Obligation          |
| Attendance Register and Attendance Information and School Attendance Order | Education (Public Registration) (England) Regulations 2006<br>Education Act 1996 |  | Department for Education<br><br>Local Authority<br><br>Future Educational Establishments | Legal Obligation          |
| Common Transfer File   | Education (Public Registration) (England) Regulations 2006                       | Religion<br>Ethnicity<br>(6 Necessary for archiving, historical research or statistical purposes in the Public Task)<br><br>Health<br>(5 Necessary for   | Department for Education<br><br>Local Authority<br><br>Future Educational Establishments | Legal Obligation          |



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|  |  | 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)<br><br>Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task | Department for Education<br><br>Local Authority<br><br>Future Educational Establishments | Legal Obligation |
| Education Supervision Order  | Children's Act 1989  |   | Local Authority<br><br>Next Educational Establishment                                    | Legal Obligation |
| Exclusion (and Suitable Education)                                     | Education Act 1996 and 2002                                |   | Local Authority<br><br>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 Public Task in the area of public health)   | Ofsted   | Legal Obligation |





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|  |  | Ethnicity<br>(6 Necessary for archiving, historical research or statistical purposes in the Public Task)   |  |                  |
| Pupil Information                                | Education (Public Registration) (England) Regulations 2006<br>Education Act 1996 | Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)<br><br>Religion/ Ethnicity (6 Necessary for archiving, historical research or statistical purposes in the Public Task) | Department for Education<br><br>Local Authority<br><br>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)<br><br>Religion/ Ethnicity (6 Necessary for archiving, historical  | Department for Education<br><br>Local Authority<br><br>Warwickshire MASH (includes Police, Warwickshire County Council, NHS and social services and any other key partner agencies). | Legal Obligation |



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|  |  | research or statistical purposes in the Public Task   | Next Educational Establishment   |                  |
| Special Educational Needs and SEN Report               | Education (Public Registration) (England) Regulations 2006<br>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<br><br>Local Authority<br><br>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<br><br>Next Educational Establishment                                    | Legal Obligation |
| Suitable Education (Not received for any other reason) | Education Act 1996   |   | Local Authority<br><br>Next Educational Establishment                                    | Legal Obligation |
| Single Central Register                                | Keeping Children Safe In Schools   |   |  | 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<br><br>Compass (School Nurse)<br><br>Police<br><br>Next Educational Establishment<br><br>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 Number                             | Health (5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health)              | Warwickshire County Council Health and Safety  | Legal Interest            |



**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<br>Tempest Photography<br>School Website<br>School Newsletter<br>Media - Local Newspaper, Radio<br>Twitter<br>Facebook<br>Instagram | Consent                   |
| Class Name  |   | Braiswick - Photographers<br>Tempest Photography<br>School Website<br>School Newsletter<br>Media - Local Newspaper, Radio<br>Twitter<br>Facebook<br>Instagram | Consent                   |
| Christian Name  |   | School Website<br>School Newsletter<br>Media - Local Newspaper, Radio   | Consent                   |
| Year Group  |   | School Website<br>School Newsletter<br>Media - Local Newspaper, Radio<br>Twitter<br>Facebook<br>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<br>Counselling Service<br>Educational Psychologist<br>Integrated Disability Service<br>SEND Supported LLP<br>Early Help                       | Consent                   |



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



**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<br>TT Rockstar<br>Mathletics<br>Showme.com<br>123 Maths<br>Spelling Frame<br>Tapestry<br>After School Clubs eg<br>Sewing Club, Archery,<br>Football, Tag Rubgy,<br>Tennis<br>SIMS Parent App Lite<br>Parent Mail<br>Educaterers<br>Compass (School<br>Nurse)<br>Department for<br>Education<br>Warwickshire School<br>Finance<br>EVOLVE<br>O Track<br>Public Health and<br>other public health<br>agencies<br>Standards Testing<br>Agency (Department<br>for Education)<br>Warwickshire Music | Public Task               |
| Gender           |   | TT Rockstar<br>Mathletics<br>SIMS Parent App Lite<br>Parent Mail<br>Compass (School<br>Nurse)<br>Department for<br>Education<br>O Track<br>Public Health and<br>other public health  | Public Task               |



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



|                              |  |   |             |
|------------------------------|--|---|-------------|
| Free School Meal Eligibility |  | Parent Pay<br>Tapestry<br>SIMS Parent App Lite<br>Cool Milk<br>Department for Education<br>O Track<br>Warwickshire Music  | Public Task |
| Date of Birth                |  | Parent Pay<br>TT Rockstar<br>Mathletics<br>Tapestry<br>SIMS Parent App Lite<br>Parent Mail<br>Cool Milk<br>Compass (School Nurse)<br>Department for Education<br>O Track<br>Standards Testing Agency (Department for Education)<br>Warwickshire Music         | Public Task |
| Parent Name                  |  | Parent Pay<br>Tapestry<br>After School Clubs eg Sewing Club, Archery, Football, Tag Rugby, Tennis<br>SIMS Parent App Lite<br>Parent Mail<br>Cool Milk<br>Compass (School Nurse)<br>Department for Education<br>Public Health and other public health agencies | Public Task |
| Address                      |  | Parent Pay<br>Tapestry<br>After School Clubs eg Sewing Club, Archery, Football, Tag Rugby, Tennis   | Public Task |





|                                   |  |  |             |
|-----------------------------------|--|--|-------------|
|                                   |  | SIMS Parent App Lite<br>Parent Mail<br>Compass (School Nurse)<br>Department for Education  |             |
| Contact phone number              |  | Parent Pay<br>Tapestry<br>After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis<br>SIMS Parent App Lite<br>Parent Mail<br>Compass (School Nurse)<br>Department for Education<br>Public Health and other public health agencies | Public Task |
| Contact email address             |  | Parent Pay<br>Tapestry<br>After School Clubs eg Sewing Club, Archery, Football, Tag Rubgy, Tennis<br>SIMS Parent App Lite<br>Parent Mail<br>Compass (School Nurse)<br>Department for Education<br>Public Health and other public health agencies | Public Task |
| UPN                               |  | Tapestry<br>Department for Education<br>O Track<br>Warwickshire Music  |             |
| English as an additional language | Ethnicity (1 Explicit consent of the data subject) | Tapestry<br>SIMS Parent App Lite<br>Department for Education<br>O Track  |             |



|                             |  |   |             |
|-----------------------------|--|---|-------------|
| Medical Information         | Health<br>(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 Rubgy, Tennis<br>SIMS Parent App Lite<br>Compass (School Nurse)<br>Department for Education<br>Public Health and other public health agencies |             |
| Dietary Needs               |  | Educaterers   | Public Task |
| Religion                    | Religion/ Ethnicity<br>(6 Necessary for archiving, historical research or statistical purposes in the Public Task              | Department for Education  | Public Task |
| Academic Achievement        |  | Department for Education<br>O Track<br>Warwickshire Music   | Public Task |
| SEN Status                  |  | Warwickshire School Finance<br>Department for Education<br>O Track<br>Warwickshire Music  | Public Task |
| Volunteer Name              |  | Evolve  | Public Task |
| Results of COVID-19 testing | Health<br>(5 Necessary for the preventive or occupational medicine or for reasons of Public Task in the area of public health) | Public Health and other public health agencies  | Public Task |