



Privacy Notice for Staff

How we use your information 2025-26

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

Park Hill Junior School
Parkfield Drive
Kenilworth
Warwickshire
CV8 2JJ

admin2307@welearn365.com

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 staff.

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 reveals 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 staff?

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

- personal information such as name, employee or teacher number and national insurance number, home address and email address.
- Emergency contact details of your next of kin
- special categories of data including characteristics information such as gender, age, ethnic group



Executive Head: Miss Lizzy Biggs

Park Hill t: 01926 855974 e: admin2309@welearn365.com

Thorns t: 01926 853875 e: admin2307@welearn365.com

- contract information such as start dates, hours worked, post, roles and salary information
- work absence information such as number of absences and reasons
- qualifications and, where relevant, subjects taught
- Performance information, outcomes of any capability, disciplinary or grievance procedures.
- Copies of your right to work documents, including documents used to verify your identity.
- We may also collect, use, store, and share (when appropriate) information about criminal convictions and offences.

For what purposes do we use personal information?

We use staff data to:

- develop a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid and receive other staff benefits
- ensure that we can act in an emergency
- facilitate safer recruitment, as part of our safeguarding obligations towards pupils
- support effective performance management
- allow better financial modelling and planning
- enable equalities monitoring
- improve the management of workforce data across the sector
- support the work of the School Teachers' Review Body
- To keep the school and community safe and well

Collecting staff information

Whilst the majority of staff 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 staff 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. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

1) To comply with the law

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

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.



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 is processed 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 staff members receive the training 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 staff are properly supported and able to do their job.

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.

5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract

We are able to process personal information in order to comply with the contract that we have with you.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Appendix 5.

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) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- 3) Processing relates to personal data which is manifestly made public by the data subject
- 4) Necessary for establishing, exercising or defending legal claims
- 5) Necessary for reasons of substantial public interest
- 6) Necessary for preventive or occupational medicine, or for reasons of public interest in the



area of public health

7) Necessary for archiving, historical research or statistical purposes in the public interest

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

Who might we share your information with?

We routinely share staff information with:

- our local authority
- the Department for Education (DfE)
- where appropriate, parents, carers and pupils.

We do not share information about our staff 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:

The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.

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

To find out about the data collection requirements placed on us by the Department for Education including the data that we share with them, please 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).

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 or territory outside of the UK, we will do so in accordance with data protection legislation.

What are your rights with respect of your personal information?

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at 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:

- In certain circumstances, 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
- to request the deletion or removal of personal data where there is no compelling reason for its continued processing
- to restrict our processing of your personal data (i.e. permitting its storage but no further processing)
- 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
- subject to the complains procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint



If you have a complaint about how your data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This allows us to investigate and resolve the issue as quickly as possible.

- Park Hill Thorns Primary Federation DPL: Harrison.r2@welearn365.com
- Park Hill Thorns Primary Federation DPO: schooldpo@warwickshire.gov.uk

When you contact us, please provide as much detail as possible about your complaint. This will help us to understand the issue and investigate it thoroughly.

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires. Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

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 **July 2027**.



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
New starter form (Salutation Forename, Surname, Address, Date of Birth, National Insurance Number, Bank details, Teacher Number, Qualifications, Employment details)	Education Act 2005, Section 114 and accompanying regulations		Your HR – payroll SIMS	Legal Obligation
School workforce census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department for Education	Legal Obligation
School workforce census – Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Necessary for reasons of substantial public interest	Department for Education	Legal Obligation
Staff information, including personal details, N.I. number, DBS checks, qualifications,	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Local Authority, Disclosure & Barring Service	Legal Obligation



verification of right to work in the U.K.				
Name			School Website (ReachMoreParents)	Contract
School Work Force Census including staff personal details	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	Legal Obligation
CPOMS (Name, Employment Dates, Employment Type, Qualifications, Right to Work in the UK, previously worked aboard, DBS details)	Keeping Children Safe In Education 2026/7		CPOMS	Legal Obligation
Accident Report (Name, Contact Details, DOB)	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation



Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	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, Contact Details, Medical Information, Allergy	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medicine	Educaterers NHS Police EVOLVE (Educational Visits Software). SIMS	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics / ambulance SIMS	Vital 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
Staff Image		School Photographers School website (ReachMoreParents) Newsletter (SWAY) Local Media Social Media	Consent
Staff Name		Newsletter (SWAY and ReachMoreParents) Local Media Social Media	Consent
Staff email address (work)		Parents and other members of staff	Public Task
Staff mobile number		Other members of staff	Public Task



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
Attendance Records at staff meetings and staff training		Not shared externally	Public Task
Staff personal characteristics i.e. Religion / Gender / Ethnicity	Necessary of reasons of substantial public interest	Local Authority – Confidential Recruitment Monitoring, Annual census	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interests
Information relating to Trade Union Membership where there is industrial action that may impact the function of the school including class and/or school closures.	Article 9(2) (b) <i>Employment and social security and social protection law</i>	Parents, Governors and other members of staff	Public Task
Name and Class		TT Rockstar Sonar Parent Pay Tapestry Warwickshire School Finance EVOLVE CPOMS Website	Public Task
Staff name, date of birth, class and contact details		Public Health and other public health agencies	Public Task
Staff name, date of birth, class and contact details		Standards Testing Agency (Department for Education)	Public Task



Staff Name, Date of Birth and Hours worked		SAS Schools Mutual Absence Insurance and Wellbeing	Public Task
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Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	Local Authority & Ofsted	Public Task / Legal Obligation
Absence Records (including number of absences, reasons for absence & self-certifications forms)	Local Authority – HR & Payroll Team	Public Task
Disciplinary action taken	Local Authority – HR advisory team where relevant	Public Task
Grievances	Local Authority – HR advisory team where relevant	Public Task
Staff Information i.e name D.O.B, address, contact details, Emergency contact details	Department of Education – school workforce census.	Legal Obligation
P45 Forms	Local Authority – HR & Payroll team	Public Task
Consent Forms i.e UK GDPR, Policy Agreement	Not shared externally	
Staff personal bank details	Local Authority requirement for Payroll System	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	Not shared externally	
Staff information, including personal details, N.I number, DBS, Address, Phone number.	Secretary of State, Local Authority, Disclosure & Barring Service,	Legal Obligation