



THORNTON PRIMARY SCHOOL

Love • Respect • Ambition

Privacy Notice 2026–2027

Data Protection Officer: David Ashcroft, Headteacher

Contact: head@thorntonprimary.lancs.sch.uk | 01253 821128

1. Introduction

Thornton Primary School is committed to protecting the privacy and security of personal information relating to our pupils, parents and carers, staff, governors, visitors and other members of our school community.

This Privacy Notice explains what personal information we collect, why we collect and use it, how we protect it, who we may share it with and the rights individuals have in relation to their personal information.

We recognise that pupils' personal information is particularly important and that children require appropriate protection and clear, age-appropriate information about how their information is used.

This notice should be read alongside the school's Data Protection Policy, Records Management and Retention Schedule, Online Safety Policy, Safeguarding and Child Protection Policy and other relevant school policies and procedures.

The school will comply with applicable data protection legislation and guidance, including:

- the UK General Data Protection Regulation (UK GDPR);
- the Data Protection Act 2018;
- the Data (Use and Access) Act 2025;
- relevant education legislation and regulations;
- guidance issued by the Department for Education (DfE); and
- guidance and codes of practice issued by the Information Commissioner's Office (ICO).

The DfE's current guidance requires schools to make privacy notices freely available, keep them clear and accessible, and review them at least annually and whenever there is a significant change in how personal data is processed.



2. Who is responsible for your information?

For most personal information processed by Thornton Primary School, the school is the **data controller**.

The data controller determines what information is collected, why it is collected, how it is used, who it may be shared with and how long it should be retained.

The school has appointed a Data Protection Officer (DPO) who provides advice and monitors compliance with data protection requirements.

Data Protection Officer:

David Ashcroft, Headteacher
Thornton Primary School

Email: head@thorntonprimary.lancs.sch.uk

Telephone: 01253 821128

The DPO can be contacted by pupils, parents/carers, staff or other individuals who have questions or concerns about how their personal information is being processed.

3. What information do we collect?

We collect and hold information about pupils and their families that is necessary for the effective operation of the school and the education, safeguarding and wellbeing of pupils.

This may include:

Personal information

- pupil name;
- date of birth;
- address;
- telephone numbers;
- email addresses;
- emergency contacts;
- unique pupil number;
- admission and school history information;
- photographs and videos where appropriate;
- identifiers used by school systems.

Educational information



- assessment and attainment information;
- progress information;
- curriculum and learning information;
- educational records;
- intervention and support information;
- information relating to special educational needs and disabilities (SEND);
- information relating to Education, Health and Care Plans (EHCPs).

Attendance and behaviour information

- attendance and absence records;
- lateness information;
- reasons for absence;
- behaviour records;
- exclusions and suspensions;
- safeguarding and welfare information where relevant.

Special category information

Where necessary and lawful, we may process special category information, including:

- health and medical information;
- SEND information;
- information concerning racial or ethnic origin;
- religious or philosophical information;
- information relating to a pupil's wellbeing;
- biometric information where lawfully used.

Safeguarding information

We may process information relating to safeguarding, child protection, welfare concerns and referrals. This may include information recorded on the school's safeguarding systems and information received from parents, pupils, other professionals, the local authority, health services, police or children's social care.

Safeguarding information will be processed and shared where necessary to protect children and promote their welfare.

4. Information about parents, carers and families

We may collect information about parents, carers and other individuals with parental responsibility, including:

- names;



- addresses;
- telephone numbers;
- email addresses;
- relationship to the pupil;
- parental responsibility information;
- emergency contact information;
- information necessary to support attendance, safeguarding and welfare;
- information required to administer payments, trips, clubs and other school services.

We may also receive information from other professionals or organisations where this is necessary to safeguard or support a pupil.

5. Why do we collect and use personal information?

We collect and use personal information to:

- provide education and support to our pupils;
- support pupils' learning and development;
- monitor and report progress and attainment;
- identify and support pupils with SEND;
- provide pastoral care and support;
- promote pupils' wellbeing;
- safeguard children and adults;
- monitor and improve attendance;
- manage behaviour, suspensions and exclusions;
- administer admissions and transfers;
- meet our statutory duties;
- comply with education and other legal requirements;
- organise educational visits, activities and clubs;
- communicate with parents and carers;
- provide appropriate medical and first-aid support;
- administer school finances and payments;
- manage school systems and services;
- monitor and improve the quality of education and services;
- support equality, inclusion and accessibility;
- meet health and safety responsibilities;
- prevent and detect crime, fraud and other unlawful activity;
- provide information to the Department for Education and other statutory bodies;
- support research and statistical analysis where permitted by law; and
- respond to complaints, enquiries and requests relating to personal data.

We will only collect information that is necessary, adequate, relevant and proportionate for the purposes for which it is being processed.



6. Our lawful bases for processing information

Data protection law requires the school to identify a lawful basis for processing personal information.

Depending on the circumstances, the school may rely on:

- **legal obligation** – where the school is required by law to process information;
- **public task** – where processing is necessary for the school to perform a task in the public interest or exercise official authority;
- **legitimate interests** – where applicable and appropriate, taking account of the rights and interests of individuals;
- **contract** – where processing is necessary to fulfil a contract;
- **consent** – where the law requires or permits consent to be used;
- **vital interests** – where processing is necessary to protect someone's life in an emergency.

The lawful basis used depends upon the particular processing activity. Consent is therefore not required simply because personal information is being collected.

Where we process special category information, we will also identify an appropriate additional condition under data protection legislation.

Where information relating to criminal offences is processed, we will ensure that the additional legal requirements for such processing are met.

The school will maintain appropriate records of its processing activities and will review its lawful bases when processing arrangements change.

7. Consent

Where the school relies on consent, consent will be:

- freely given;
- specific;
- informed;
- unambiguous;
- recorded appropriately; and
- capable of being withdrawn.

Where appropriate, pupils and parents/carers will be given clear information about what they are consenting to and how they can withdraw consent.

Withdrawing consent will not affect processing that has already taken place lawfully.



Where the school has another lawful basis for processing information, withdrawing consent will not necessarily mean that the school must stop processing the information.

8. Collecting pupil information

Most of the information the school collects is required by law or is necessary for the school to carry out its responsibilities.

Where information is voluntary, we will make this clear and explain whether there is a choice about providing it.

We will normally collect information directly from pupils, parents or carers, but information may also be received from:

- previous schools;
- nurseries and early years settings;
- the local authority;
- the Department for Education;
- health professionals;
- children's social care;
- the police and other safeguarding agencies;
- other education providers;
- professionals supporting a pupil;
- examination and assessment organisations; and
- other organisations where this is lawful and necessary.

9. Information sharing

Thornton Primary School will share personal information where there is a lawful basis to do so.

We will not share personal information simply because someone asks for it.

Information may be shared where:

- there is a legal requirement;
- it is necessary to protect a child or another person;
- it is necessary for safeguarding or child protection;
- it is necessary to provide education or support;
- it is necessary to fulfil a statutory duty;
- it is necessary to provide services;
- it is necessary to comply with a court order or other legal process; or
- another lawful basis applies.



We will consider necessity, proportionality, confidentiality and the rights of individuals before sharing information.

Safeguarding considerations will always take priority where necessary to protect a child from harm.

10. Organisations and systems with which we may share information

Depending on the circumstances and the services being provided, information may be shared with organisations including:

- Lancashire County Council;
- Department for Education;
- Ofsted;
- schools and other education providers;
- NHS and school nursing services;
- health professionals;
- Children's Social Care;
- police and other safeguarding agencies;
- CAMHS and other appropriate support services;
- educational psychologists and specialist professionals;
- organisations supporting pupils with SEND;
- examination and assessment organisations;
- school transport and swimming services;
- educational visit providers;
- payment and administration providers;
- school photographers;
- catering and milk providers;
- IT and educational technology providers;
- safeguarding and pastoral support organisations; and
- other organisations providing services to the school.

The school maintains records of the systems and third parties used to process personal information.

Where an external organisation processes information on the school's behalf, the school will ensure that appropriate contractual and data protection safeguards are in place.

11. Educational technology and online services

Thornton Primary School uses a range of digital systems and educational applications to support teaching, learning, communication, administration, safeguarding and pupil wellbeing.



These may include, where currently used by the school:

- SIMS;
- CPOMS;
- ParentPay;
- Evolve;
- IDL;
- Bug Club;
- Times Tables Rock Stars;
- EdShed; and
- other approved educational applications and platforms.

The list of systems may change as the school's needs develop.

Before introducing new systems, the school will consider data protection, security, privacy and safeguarding requirements and, where appropriate, complete a Data Protection Impact Assessment (DPIA).

The school will not use an educational application simply because it is useful; appropriate consideration will be given to the information being processed, the provider, security arrangements, contractual terms and the needs and rights of pupils.

12. Artificial Intelligence

The school recognises that artificial intelligence (AI) can provide educational and administrative benefits but may also create risks to personal privacy.

Staff must not enter confidential, sensitive or identifiable pupil, parent or staff information into AI tools unless the school has specifically authorised the tool and appropriate data protection safeguards are in place.

The school will consider:

- what personal information an AI system processes;
- why the information is required;
- where the information is stored;
- whether information is shared with third parties;
- whether information is used to train AI models;
- security arrangements;
- retention arrangements;
- whether a DPIA is required; and
- the rights and interests of children and other individuals.

The school will follow current DfE and ICO guidance when using AI.



13. Photographs, videos and CCTV

Photographs and videos may be taken in school and during school activities for purposes including:

- teaching and learning;
- recording school activities;
- celebrating pupil achievements;
- school communications;
- the school website and social media;
- newsletters and publications;
- safeguarding and security.

The lawful basis for using photographs or videos will depend upon the purpose for which they are being used.

Where consent is required, the school will seek it appropriately.

The school may also operate CCTV or other security systems where necessary for safeguarding, security, health and safety or the prevention and detection of crime.

CCTV images will only be accessed and disclosed where there is a lawful reason to do so

14. Filtering, monitoring and safeguarding

The school uses appropriate filtering and monitoring systems to support online safety and safeguarding.

Information generated through filtering and monitoring may include information about websites accessed, searches, alerts or other activity where necessary for safeguarding.

Such information will be accessed only by authorised individuals and will be handled in accordance with data protection, safeguarding and information security requirements.

The school recognises that filtering and monitoring information may contain sensitive information and will ensure that access is appropriately restricted.

15. Department for Education and statutory data collections

The school is required by law to provide certain information about pupils to the Department for Education and other statutory bodies.



This includes information provided through statutory data collections such as the School Census and, where applicable, early years and other statutory collections.

The lawful basis for each statutory collection is determined by the relevant legislation and DfE requirements.

DfE data collections support purposes including:

- education funding;
- monitoring educational standards;
- planning education services;
- accountability;
- policy development;
- statistical analysis;
- research; and
- supporting the education and wellbeing of children.

The school will only provide information required by the relevant statutory collection.

16. National Pupil Database

The Department for Education maintains the National Pupil Database (NPD), which contains information about pupils in England.

Information supplied through statutory collections may form part of the NPD.

The DfE may use information from the NPD for purposes including research, analysis, statistics, policy development and the improvement of education and children's wellbeing.

The DfE applies controls to the access and use of NPD information and organisations receiving information must comply with relevant requirements.

Further information is available in the DfE's National Pupil Database Privacy Notice.

17. How we keep information secure

Thornton Primary School takes appropriate technical and organisational measures to protect personal information against:

- unauthorised access;
- accidental loss;
- destruction;
- misuse;



- alteration;
- disclosure; and
- other forms of unlawful processing.

Access to personal information is restricted to individuals who need it for legitimate school purposes.

Staff receive appropriate data protection and information security training.

The school regularly reviews:

- access permissions;
- information systems;
- security arrangements;
- data protection procedures;
- third-party services; and
- staff awareness and training.

Where a personal data breach occurs, the school will follow its data breach procedures and will report the breach to the ICO where required.

18. How long we keep information

The school does not retain personal information indefinitely.

Information is retained in accordance with the school's Records Management and Retention Schedule and relevant statutory requirements.

Different categories of information may have different retention periods.

We will periodically review information held and securely delete or destroy information that is no longer required, unless there is a lawful reason for retaining it.

The previous blanket retention statement of retaining all pupil information until 31 August of the year in which a pupil reaches 25 has therefore been replaced by the school's current retention schedule.

19. International transfers

Where personal information is transferred outside the United Kingdom, the school will ensure that the transfer is lawful and that appropriate safeguards are in place in accordance with applicable data protection legislation.

This includes considering the location of cloud services and educational technology providers used by the school.



20. Children's privacy

Thornton Primary School recognises that children have data protection rights in their own right.

We will provide information about privacy in a way that is appropriate to pupils' age, understanding and individual needs.

We will encourage pupils to understand:

- what personal information is;
- why information is collected;
- how information should be protected;
- what they should do if they are concerned about their information; and
- how they can exercise their data protection rights.

Particular care will be taken when processing information relating to children, including information concerning safeguarding, SEND, health and wellbeing.

21. Your data protection rights

Under data protection legislation, individuals may have rights including:

- the right to be informed about how their information is used;
- the right of access to personal information;
- the right to have inaccurate information corrected;
- the right to request erasure in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to data portability in certain circumstances;
- the right to object to certain processing;
- rights relating to automated decision-making and profiling; and
- the right to withdraw consent where consent is the lawful basis for processing.

Not all rights apply in every circumstance. Some rights are subject to legal exemptions and restrictions.

Where information is processed because the school has a legal obligation or is performing a public task, an individual may not have the right to require the school to stop processing that information.

22. Subject Access Requests

Individuals generally have the right to request access to the personal information the school holds about them.



Parents may, in appropriate circumstances, make a request relating to their child's information. However, the rights of the child will be considered, particularly where a child is sufficiently mature to understand their own rights.

Requests should be made to the Data Protection Officer:

David Ashcroft, Headteacher

Email: head@thorntonprimary.lancs.sch.uk

Telephone: 01253 821128

The school will deal with requests in accordance with the statutory requirements and applicable exemptions.

23. Complaints and concerns

Thornton Primary School encourages anyone with a concern about the handling of their personal information to contact the school in the first instance.

Concerns will be considered promptly and dealt with in accordance with the school's complaints and data protection procedures.

Individuals also have the right to raise a concern with the **Information Commissioner's Office (ICO)**.

Information about making a complaint is available from the ICO website:

<https://ico.org.uk/concerns/>

24. Changes to this Privacy Notice

This Privacy Notice will be reviewed at least annually and whenever there is a significant change to the way the school processes personal information.

Where a significant change affects how individuals' personal information is used, the school will provide appropriate information to affected individuals.

The school will continue to monitor updates from the Department for Education, Information Commissioner's Office and other relevant bodies.

25. Further information

Further information about data protection in schools is available from the Department for Education:



<https://www.gov.uk/guidance/data-protection-in-schools>

Further information about data protection rights is available from the Information Commissioner's Office:

<https://ico.org.uk/>

Further information about the Department for Education's use of pupil information is available through its National Pupil Database Privacy Notice:

<https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice>

26. Contact

If you have any questions about this Privacy Notice or how Thornton Primary School processes personal information, please contact:

Mr David Ashcroft

Headteacher and Data Protection Officer

Thornton Primary School

Email: head@thorntonprimary.lancs.sch.uk

Telephone: 01253 821128

Signed: Mr David Ashcroft, Headteacher

Date: September 2026

Review Date: September 2027

To be agreed by the Staffing, Finance & Resources Committee on 03/11/2026