

Castle Primary School

Privacy Notice for Pupils and Parents (updated by Castle Primary School May 2026)

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About this Privacy Notice

Castle Primary School is part of Tiverton Co-operative Learning Trust and is covered by Castle Primary School Data Protection Policy.

Individuals have a legal right to be informed about how we use their personal information. This Privacy Notice explains how we collect, store and use personal information. It is intended for pupils and parents (including carers or guardians who we refer to in this privacy notice as 'parents') and we encourage all to read it. We have produced a separate privacy notice for the school's workforce **and a shorter, simpler notice for pupils themselves.**

Our aim is to always provide clear information about the personal information we are using and why we are using it. We have tried to keep the language in this privacy notice as simple as possible, however if anything is unclear or if you have any concerns then please contact **Castle Primary School** and ask to speak to the Data Protection lead.

This is the school's main 'overarching' Privacy Notice and it applies generally to the personal information that we collect and use. It is based on the model privacy notice produced for schools by the Department for Education (DfE). Unless there is a lawful reason not to do so, we will also provide more specific privacy information at the point at which we collect or use personal information, for example if we collect personal data via an online or paper form.

Whilst much of the personal information that we collect is mandatory (ie it must be provided so that we can manage the school, fulfil our legal obligations and provide an education), some of it is requested on a voluntary basis. Where this is the case, we will request consent at the point we collect the information. We will explain to you whether there is a requirement to provide certain information to us, or whether you have a choice in doing so.

For the purposes of data protection law, **Castle Primary School** is the 'data controller'. **Our Data Protection Officer is One West**; contact details are provided at the end of this privacy notice.

The personal data we hold (categories of personal data)

We process personal information to be able to run the school, to provide pupils with an education and to make sure that we can look after our pupils appropriately. We may collect information directly from pupils or parents or from other places including other schools, the local council and the Department for Education (DfE). Examples of the types of personal data that we may collect, use, store and share (when appropriate) are listed at **Appendix 1.**

Our lawful reasons for processing pupil/parent information (lawful bases)

Data Protection law requires us to have a lawful reason ('lawful basis') for processing the personal data we use. These reasons are listed under Article 6 of the 'General Data Protection Regulation' (GDPR). Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Castle Primary School processes a wide range of personal data for a variety of purposes, as described above. The lawful bases we rely on will therefore vary. However, generally, the lawful bases we mainly use in relation to pupils and parents are:

- **We need to comply with the law (we have a legal obligation):** for example we collect and use pupil information under legal and statutory obligations within the Education Act 1996, The

Children Act 2004; Education and Inspections Act 2006; Education Act 2011; the Family and Children Act 2014 and Keeping Children Safe in Education (KCSIE).

- **We need to carry out a task in the public interest:** for example, the collection and use of pupil information is necessary for us to perform our role as a school and to deliver our public task of providing education to our pupils.
- **You have given us your consent** for example a photo of you for promotional purposes or our website.
- **We need to protect your vital interests (or someone else's interests)** this relates to life and death situations.
- **It is in ours or a third party's legitimate business interests to process the data** where this is the case, we will ensure that we have considered whether our legitimate interests are overridden by your rights and freedoms as the pupil or parent.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so. We will then cease this aspect of processing.

When a pupil is considered mentality capable of making their own decisions with regards consent (while there is no defined age, this is normally considered once a child attends Secondary school), their consent choices over-ride those made by the parent or guardian.

Some of the reasons that we use for collecting and using information may overlap and there may be several grounds allowing us to use personal data. There are also other lawful bases that may apply, and this will be made clear wherever possible.

Our lawful basis for processing will be explained at the point at which we collect personal information unless there is a lawful reason not to do so (for example where it is for the prevention or detection of crime).

Special category (sensitive) personal information

We may also collect, store, and use information about you that falls into "special categories" of more sensitive personal data which has extra protection in law and requires us to identify a condition for processing under Article 9 of the GDPR.

Special category data is personal data revealing:

- racial or ethnic origin
- political opinions
- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data for the purpose of uniquely identifying a natural person (for example fingerprints)
- data concerning health; or
- data concerning a natural person's sex life or sexual orientation

The Article 9 grounds which we may rely on to process special category data include:

- Legal obligation
- Substantial public interest including:
 - Statutory and government purposes
 - Equality of opportunity or treatment
 - Preventing and detecting unlawful acts
 - Preventing fraud
 - Public Health
 - Safeguarding
- Support for individuals with a particular disability or medical condition
- Explicit consent, for example to the use of biometric data, eg fingerprints.
- To maintain your vital interests

Please refer to our special category of data policy which forms part of our data protection policy for further information.

Criminal convictions

We may process data about criminal convictions or offences. This will usually be where such processing is necessary to carry out our obligations, to exercise our rights, to look after our students and staff or to support the police and other relevant agencies.

We will only use information about criminal convictions or offences where the law allows us to. Usually this will be either on the basis of our legal obligations in relation to safeguarding, preventing fraud, health and safety or with your consent. We also need to identify the relevant condition for the processing, this will usually be substantial public interest.

Collecting pupil/parent information: Why do we collect and use your information?

The reasons that we collect and use personal information enable us to provide our pupils with an education and to help us run the school. Please refer to **Appendix 2** for examples.

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include methods as outlined at **Appendix 3**.

We may also collect information about you from third parties such as information from other schools or other third parties engaging with you outside the school.

Whom we share pupil information with

Information about pupils and parents will not be shared with any third party without consent, unless the law allows us to do so. Where it is legally required or necessary (and it complies with data protection law) personal information may be shared with the relevant local authority to meet our legal obligations to share information such as safeguarding concerns or with the Department for Education (DfE). To find out more about the data collection requirements that are placed upon us by the DfE including the data that we share with them go to: <https://www.gov.uk/education/data-collection-and-censuses-for-schools>. **We do not use data for profiling, and only for marketing if you have**

opted in e.g. to our newsletter.

Further examples of with whom we share data are listed at **Appendix 4**. Details of how we share data with the Department for Education can be seen in **Appendix 5**.

Third Party Processors

There are occasions when we contract or commission third party organisations or software systems to carry out functions on our behalf, and inevitably these functions will involve those third parties processing personal data on our behalf. Details of the Third Party Processors we use, including what data is processed and why can be found at **Appendix 6**.

Third Party Processors are acting on our behalf and under our instruction, governed by a contract that meets the requirements defined by GDPR.

Storing pupil and parent data

Personal data is stored in line with our data protection policy in a range of different places including within pupils' files and our IT systems including the school's email system.

The information that we create and maintain is kept secure. Once a pupil's education with us has ended, we may retain such information beyond their attendance at the school as deemed necessary and in line with our retention policies. A copy of the Retention Schedule can be obtained by contacting the school office.

Transferring data internationally

Where we transfer personal data to a country or territory outside the UK and European Economic Area, we will do so in accordance with data protection law and ensure that we have sufficient safeguards in place.

Requesting access to your personal data

Individuals have the right to request access to information about them that we hold. This is known as making a 'Subject Access Request' (SAR). If you make a subject access request, and if we hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for
- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form within a month, unless an extension is necessary on the ground of the complexity of the request

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances. If you would like to make a request, please contact the school office.

Children have the same rights as adults over their personal data and the school will assess each

request on its own merits. Pupils can find out what personal information we hold about them and how we use it by making a subject access request as long we judge that they can properly understand their rights and what this means.

Those with parental responsibility can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (mental capacity will be judged by the school on a case by case basis), or where the child has provided consent and it is considered to be in the best interests of the child. Parents also have the right to make a subject access request with respect to the personal data the school holds about themselves. If you would like to make such a request, please contact the school office and ask for the Data Protection lead.

Parents also have an independent legal right to access to their child's educational record. To exercise this right, please contact the school office.

Other rights

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- To request to have personal data rectified, if you believe that it is inaccurate or incomplete.
- To request the deletion or removal of personal data where there is no compelling reason for its continued processing.
- To restrict our processing of personal data (ie permitting its storage but no further processing) under certain circumstances.
- To object to processing if we are processing your information as part of our public tasks, or on the basis of our legitimate business interests, in which case we will consider your objection, and balance this against our need to process the information.
- To object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics.
- To withdraw your consent to processing
- To have personal information, which you have provided, transmitted electronically to another organisation in certain circumstances.
- Not to be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect - unless you have agreed or in other limited circumstances.
- A right to seek redress, either through the ICO, or through the courts

Contact and Complaints

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please either contact the school office 01884 253398 and ask to speak to the Data Protection lead.

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please contact the school's Data Protection lead or our Data Protection Officer One West: i-west@bathnes.gov.uk or 01225 395959.

You can also complain to the Information Commissioner's Office if you are unhappy with how we have used your data, but they would generally expect you to have raised the issue with us first:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Updates to our Privacy Notice

We may need to update this Privacy notice periodically. This version was last updated on :
September 2025

Appendix 1: Non- exhaustive list of examples of the types of personal data which we collect about pupils and parents

- Personal identifiers and contacts (such as name, unique pupil number, contact details and address).
- Characteristics (such as ethnicity, language, and free school meal eligibility).
- Safeguarding information (such as court orders and professional involvement).
- Special educational needs (including the needs and ranking).
- Medical conditions (such as doctor information, child health, dental health, allergies, medication and dietary requirements).
- Attendance record (such as sessions attended, number of absences, absence reasons and any previous schools attended).
- Test results, assessment and attainment such as EYFS assessments, KS1 SATs, Phonics, KS2 SATs and teacher assessments.
- Behavioural information (such as exclusions and any relevant alternative provision put in place).
- Photographs and CCTV
- We may use online platforms to deliver lessons remotely; (such as TEAMS) if we intend to record the lesson we will let you know

This list is not exhaustive. To access further details of the categories of personal information we process, please contact the school office 01884 253398

Appendix 2: Examples of the purposes for which we process your data

- To support pupil learning and deliver remote learning
- To monitor and report on pupil progress and check whether any extra help is needed.
- To look after pupil wellbeing.
- To keep track of how well we're performing and assess the quality of our services.
- To keep children safe (eg food allergies, or emergency contact details).
- To meet the statutory duties placed upon us eg for official data collections.
- To promote the school eg through our website, prospectuses and press releases.
- To manage payments for school meals or other activities
- To investigate incidents and/or complaints

We may be required to share information about our pupils with the local authority to ensure that they can conduct their statutory duties under the Schools Admission Code, including conducting Fair Access Panels.

Appendix 3: Ways in which we collect pupil and parent information

We collect and use information about you in a variety of way including through the school application and admissions process, from correspondence with you and through assessing pupils' educational progress. The ways in which we collect information about you may also include:

- School Application forms
- Electronic files received from the Local Authority
- Electronic and paper records received from a previous school or nursery
- Consent Forms we ask you to complete regarding medical or nutritional information
- Consent Forms you complete regarding Free School Meals

Appendix 4: Examples of whom we may share your data with where the law permits (non – exhaustive list)

- The Local Authority (Devon County Council)
- Schools that students attend after leaving (for instance Tiverton High School)
- The Department for Education (DfE).
- The National Health Service to support student safety and vaccination programs.
- The pupil's family and representatives.
- Educators and examining bodies.
- The schools' inspector
- Suppliers and service providers so that they can provide a contracted service such as careers and Physical Education provision.
- Central and local government.
- Auditors.
- Survey and research organisations.
- Security organisations.
- Health and social welfare organisations.
- Professional advisers and consultants.
- Counsellors/Educational Psychologists as and when appropriate.
- Charities and voluntary organisations.
- Police forces, courts, tribunals.
- Professional bodies.
- Our Data Protection Officer on occasion, eg to support a subject access request
- Occasionally with school governors

Appendix 5: How we share information with the Department for Education (DfE) and the National Pupil Database (NPD)

Castle Primary School is required to provide information about pupils to the DfE as part of statutory data collections such as the school census. Some of this information is then stored in the National Pupil Database (NPD), which is owned and managed by the DfE and provides evidence on school performance to inform research. The database is held electronically so it can be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

The DfE may share information from the NPD with other organisations which promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions about how they will use the data.

Sharing by the DfE:

The law allows the DfE to share pupils' personal data with certain third parties, including:

- Schools and local authorities.
- Researchers.
- Organisations connected with promoting the education or wellbeing of children in England other government departments and agencies.
- Organisations fighting or identifying crime.

We lawfully share pupil data with the DfE through data collections which is used to

- underpin school funding, which is calculated based upon the numbers of children and their characteristics in each school.
- inform 'short term' education policy monitoring and school accountability and intervention (for example, school GCSE results or Pupil Progress measures).
- support 'longer term' research and monitoring of educational policy (for example how certain subject choices go on to affect education or earnings beyond school)

For more information about the DfE's NPD data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data> To find out more about the data collection requirements placed on us by the DfE via the school census please visit:

<https://www.gov.uk/education/data-collection-and-censuses-for-schools>

To find out more about the NPD, please visit: <https://www.gov.uk/government/publications/national-pupil-database-user-guide-and-supporting-information>

If you want to see the personal data held about you by the DfE, you can make a 'subject access request' to the DfE. Further information on how to do this can be found within the DfE'S personal information charter that is published here: <https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact DfE: <https://www.gov.uk/contact-dfe>

Appendix 6: Third Party Processors we use

Third Party Processor	Personal data captured	Purpose	Country the data is processed in	Who the information may be shared with and why
Microsoft TEAMS	Pupil full name, class, image and voice, personal comments and opinions	To provide a remote learning environment, collaboratively with whole class	Republic of Ireland	The pupil's family, as evidence of academic progress. The local authority if any expressed opinions were to be considered a safeguarding concern.
Microsoft Office 365, Email and Sharepoint	Email = Pupil name and class Sharepoint -= pupil information including SEN, medical and assessment data	To provide email service for pupils to send and receive emails within the school community, they cannot send or receive emails from people outside of Castle Primary School. Sharepoint is where staff and governors store documents to be shared including policies, and risk assessments. Access is controlled and limited depending on the user level of authority.	European Union	The pupil's family School staff Senior Leadership Team Safeguarding Officers, Social Services, Police and justice system
CPOMS	Pupil name, DOB, address, any safeguarding concerns or incidents	To keep a written record of concerns Including but not limited to: Pupil behaviour, attendance, domestic issues, child protection & safeguarding, pupil welfare and health.	EEA	Safeguarding Officers, Social Services, Local Authority, Police and justice system.
Times Table Rockstars (Maths Circle Ltd)	Pupil's name & class Teacher's name & email	To practice times tables and speed up recall	EEA	School staff, pupils and pupil's parents
CCTV operated by Castle Primary School	Images of pupils / visitors	To provide security to the school and occupants of the school.	UK	Senior Leadership Team Police and justice system Social Services

Saints South West (Coaching & Education Ltd)	Pupil's name, DOB & class and details of medical information (such as asthma)	To provide the PE instructor with sufficient information to keep children safe and provide age appropriate activities.	Currently not an online system	PE instructors and staff of Saints South West
Website Provider Schools Online	Where parent has given consent Pupil's photo or a video	Marketing and promotion of the activities of the school. Communication to parents about the work their child will be doing in class.	EEA	The website can be accessed by the public
Online Payments system BROMCOM My Child At School https://bromcom.com/privacy	Pupil's name Parents name and mobile phone number, collected from Castle Primary School. Nominated parent/carer provides information direct, including bank details for payment having given their consent to collection of information. Please see the BROMCOM Privacy Notice for full information on the data collected.	To allow access to the online payments system for dinner money, school trips and clubs	BROMCOM processes information in the UK. Adequate safeguards are established to protect your data.	In order to provide the online payment service. Including payment processors, SMS providers (to send text messages) Email providers, hosting providers, security providers, support portal to provide you with help. May be shared with HM Revenue & Customs, consultants, lawyers, IT service Providers and third parties who assist in the processing.
Renaissance Learning Accelerated Reader Star Assessments	Pupil's name, DOB, class Teacher's Name & email	To assess and track reading ability and recommend suitable books to further the pupil's learning	Stored on servers in the United States via Privacy Shield	Renaissance Learning parent company Third party vendors, consultants and service providers employed by Renaissance National security or Law Enforcement. Research by Governmental Departments, Ministries or Research Agencies for instance Department for Education, National Literacy Trust or

				entities working under their authority
Language Angels Nubridge Publishing Ltd	School Admin email address is used. There is the option to add Pupil names which is not currently used. Teacher's name/class name is provided.	Scheme of work to assist teaching of French. Allows pupils to access games in French to make learning fun. . "pupil names, class names, pupil foreign language assessment scores, PDF scans of pupil work and audio and video recordings of pupil work are stored so that teachers that access the Website using your school login details can access this data (only the data that relates to your school) and generate reports from it. Teachers will only be able to access data that relates to the school associated with the login details they have used to access the Website. Any or all data that you / your teachers upload to the Website is	Stored on server at Nubridge Publishing Ltd Offices UK	Nubridge Publishing Ltd Privacy Notice states they do not share the data with Third Parties. Castle Primary School staff may access the data in order to progress pupil learning.
SpeechLink and Language Link Multimedia Ltd	School address & email & numbers of children in each class / year groups	To support teachers and teaching assistants in delivery of speech and language via newsletter and speech and language resources to download.	Data is processed in UK Stored EEA	Law enforcement. For the purpose of newsletter subscription data is shared with EU based management provider For online shop and trial request, provided by UK based data provider
Redstor (formerly Attix) IT Backup provider hosted by Scomis	Backs up all data held on school servers including reports, communications, usernames & encrypted passwords, personal and shared school documents	To provide data backups. Backups will remain encrypted on the storage platform to prevent unauthorised access.	UK	School staff & IT support Scomis (IT technicians)
Cloudberry	Backs up	To provide backups which are encrypted on the storage platform (G-Drive)	EEA	Google employees, contractors and agents

Backups to G-drive Google workspace for education	personal and shared school documents		When transferring data outside EEA legal frameworks are complied with, see G-drive Privacy Notice	
Insight (Equin Limited) London W1A 6US	UPNs Pupil names, DOB & gender. Date pupil joined and/or left school User email	Online assessment tracking tool for teachers to track pupil progress	EEA. Where data is transferred outside EEA to US contacts are safeguarded by ICO approved Standard Contractual Clauses.	May be shared with third parties to comply with legal obligation, enforce Terms of Service, prevent fraud, resolve disputes, protect the rights or safety of customers & insight
Ruth Miskin Literacy Limited 7 Sandy Row, London E1	Name, school, Date of birth, IP address, teacher's name, email.	Online assessment literacy tool for teachers to track pupil progress	UK	May be shared with third parties to comply with legal obligations, for billing purposes, for marketing and research
Atom Learning Ltd https://atomlearning.com registered and incorporated in England and Wales. Company Registration 10867907	Staff Name, email address, telephone number, school, IP address Pupil names, DOB, gender, Year group (years 3 – 6)	Online learning tool, for homework setting	Data held in EEA on own servers	Data is not shared with third parties.
TES Global Limited Building 3 St Pauls Place Norfolk St, Sheffield, S1 2JE "Provision Map"	Pupil name, DOB, year group, class, Sensitive data including SEN Teacher name, email address, IP address	This is an online tool for the School's SENDCo to map provision, track information and EHCP funding to ensure our SEN pupils are fully supported by Castle Primary Team and outside agencies	UK, EEA, Australia & in certain circumstances 3 rd parties that are based outside the UK or EEA to process.	School third parties: Senior Leadership Anonymised data to Governing body Local Authority TES third parties 8x8 INC Amazon.com, Inc

				Dotdigital Group PLC Drupal Fastly, Inc Freshworks, Inc Google LLC Microsoft Corporation Mimecast Services Ltd Salesforce Mailgun Technologies ~Alphabet Inc (Google) Groupcall WONDE Pendo
Education Shed Ltd, Severn House, Severn Bridge, Riverside North, Bewdley, Worcestershire, UK, DY12 1AB	Pupil name, year group, class. Parent email. Teacher name, email address, IP address	This is an online tool for the class teacher to test spellings appropriate for age group.	UK (London) Kept 12 months after account closed and then deleted	School leadership Parents Anonymised data to School Governing body
Tapestry: customer.service@eyfs.info or Water Court, 65 High Street, 1508 Lewes, England, BN7 1XG, UK.	Pupil name, year group, class, Date of Birth, sex and postcode. Teacher name, email address, IP address. Name of parent and their email address	This is an online tool for the EYFS Learning Journey to replace the current paper copy from Sept 2025 for all new Reception starters. The child's learning will be recorded by use of digital photos and stored as evidence of learning. Permission has been sought from parents on sharing of digital photos for this purpose.	UK & EU	Digital photos and documentation will be shared with parents. This will also be retained by the school to evidence learning through the Foundation Stage. It may be shared with School Senior Leadership Team, Governors, Ofsted, School improvement Officer, DfE. Tapestry do not share the data they hold.

H Tempest Limited School photographer	Pupil name, class, admission number	To enable the child's individual photo to be imported into Bromcom MIS to appear within the child's Bromcom record	UK and EEA	H Tempest is the data holder. See their privacy notice and if any questions email gdpr@htempest.co.uk H Tempest share data with third parties who assist with the processing.
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