CASTLE PRIMARY SCHOOL
PRIVACY NOTICE FOR PARENTS AND CARERS

1. How we use parent, carer and pupil information

Data protection legislation gives parents, carers and pupils the right to be informed about what personal data is held on them, how that data is used, who it is shared with and how long it is retained. This privacy notice provides this information, in general terms, in relation to information held on parents, carers and pupils, as well as the lawful basis under which it is collected and retained.

Whilst it is the governing board that has ultimate responsibility for ensuring that the school complies with all relevant data protection obligations, it is the school's Data Protection Officer (DPO) who advises the school on its compliance with data protection law and who develops related policies and guidelines where applicable.

The DPO provides reports to the governing board and it is the DPO, rather than the school, that is the first point of contact for the Information Commission's Office (ICO) which oversees data protection in the United Kingdom.

If after reading this notice you have any questions relating to the data we hold or how we use it, please contact our Data Protection Officer, whose contact details are listed at the end of this notice.

Castle Primary School is the Data Controller in charge of the data. The school is registered with the Information Commission's Office as a Data Controller and renews that registration annually.

2. Categories of information

The categories of information that we collect, hold and share include but are not limited to:

- contact details and personal identifiers (such as name, address, telephone numbers, email address)
- characteristics (such as ethnicity, religion, first language, nationality, country of birth and free school meal eligibility)
- attendance information (such as sessions attended, number of absences, absence reasons, prior school attended and next school)
- assessment and attainment (such as key stage 1 and phonics results)
- medical information (such as doctors' information, health checks, allergies, medication and dietary requirements)
- special educational needs information (including EHCPs)
- safeguarding information (such as court orders and professional involvement)
- exclusion information
- behavioural information (such as exclusions & any relevant alternative provision put in place)
- correspondence and records of contact
- photographs (for internal safeguarding & security purposes, school newsletters, media and promotional purposes)
- CCTV images captured in school.

We may also hold data about parents, carers and pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

3. Why we collect and use this information

It is essential for the school to collect personal data in order for the school to fulfil their official functions and meet legal requirements.

We collect and use parent, carer and pupil information in order to:

a) support pupil learning
b) monitor and report on pupil attainment progress
c) provide appropriate pastoral care
d) assess the quality of our services
e) keep children safe (food allergies, medical conditions or emergency contact details)
f) to meet statutory duties placed upon us, e.g. by the Department for Education.

We will only collect and process personal data where we have a lawful basis to do so under data protection law. We will inform affected individuals about this in the form of this privacy notice when we first collect their data. If we later need to use their personal data for an additional reason we will update this privacy notice, inform the individuals concerned and seek consent if this is appropriate.

Under the UK General Data Protection Regulation (UK GDPR), the lawful bases we rely on for processing parent, carer and pupil information are:

- for the purposes of (a), (b), (c) & (d) above; in accordance with the legal basis of public task. Collecting this data is necessary to perform tasks that the school are required to perform as part of their statutory function
- for the purposes of (e) above; in accordance with the legal basis of vital interests. Processing this data is necessary in order to protect someone's life
- for the purposes of (f) above; in accordance with the legal basis of legal obligation. Data collected for the DfE census information is covered by:
    - section 537A of the Education Act 1996
    - the Education Act 1996 s29(3)
    - the Education (School Performance Information)(England) Regulations 2007
    - regulations 5 and 8 School Information (England) Regulations 2008
    - the Education (Pupil Registration) (England) (Amendment) Regulations 2013.

We may also process personal data where we have obtained the parent's or carer's consent to use the data in a certain manner. Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn.

Occasionally, where the processing is not part of our performing tasks as a public authority, we may process data under the lawful basis that it is in our legitimate interests or the legitimate interests of a third party to do so. In these circumstances we would be using the data in a way that would be reasonably expected by the parent, carer or pupil concerned and the processing will have a minimal privacy impact or there will be a compelling justification for the processing.

If we need to process any special category data under Article 9 of the UK GDPR which is of a more sensitive nature, we will only do so if we have a lawful basis to do so under Paragraph 2 of Article 9 of the UK GDPR.

Some of the reasons listed above for collecting and using parents', carers' or pupils' personal data may overlap and it may be that more than one lawful basis applies to our processing of the data.

No decisions are made by the school through automated decision making (including profiling).

Pupil photographs

Castle Primary School strives to provide pupils with an enriched experience of education, including celebrating pupils' successes. This may involve the publication of pupils' images in the school newsletter, on the school website or social media pages and, on occasions, in the public media. The school respects the wishes of parents/carers whether or not they want their children's images used in these ways and uses a pupil image consent form to seek consent to use pupil images in specific ways. Consent can be refused or withdrawn at any time. If consent is withdrawn, we will delete the image/s and not distribute them further.

If we use photographs of individual pupils, we will not use the name of that child in the accompanying text or photo caption. If we name a pupil in the text, we will not use a photograph of that child to accompany the article. There may be specific occasions when we will ask an individual parent's/carer's additional consent to use their child's name alongside an image, for example if they have won an award.

It is not always necessary for the school to seek consent for the use of photographs. For example, when they are used for identification purposes or when they are taken for assessment purposes. Photographs in Learning Journeys and exercise books are used to record and celebrate children's progress, particularly in the Foundation Stage and in Key Stage 1. Photos of individuals, groups or classes of children may appear in these records.

Although the school regularly updates the school website and this includes the removal of out-of-date images, images may remain on the school website for up to 36 months after a child leaves the school.

The school is not responsible under data protection legislation for photographs taken for personal use by parents, carers and their relatives during school events such as Christmas plays and sports days. However, we request parents and carers not to share photographs of their children taken at these events on social media if they include other pupils. This is because it may not be appropriate that such images are shared. This may be because, by personal choice, parents or carers do not wish photographs of their children to appear on social media or it may be for reasons of child protection about which other parents or carers would not be aware. We would also expect that if during such an event a parent/carer requests another parent not to take a photograph of their child that those wishes are respected.

CCTV

We use CCTV in various locations around the school site to ensure it remains safe.

We do not need to ask individuals' permission to use CCTV but we make it clear where individuals are being recorded by security cameras being clearly visible and accompanied by prominent signs explaining that CCTV is in use.

Use of the school's CCTV is governed by a CCTV Policy.

Any enquiries about the CCTV system should be directed to the Headteacher of Castle Primary School.

4. Collecting parent, carer and pupil information

Whilst the majority of personal information provided to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection whether you are required to provide certain information to us or if you have a choice in this.

We collect the majority of parent, carer and pupil information via enrolment forms or a Common Transfer File (CTF) or other secure file transfer from a pupil's previous school. As well as holding personal data that has been provided by the parent, carer or pupil, we may also hold data provided by other sources, such as:

- local authorities
- government departments or agencies
- police forces, courts and tribunals.

5. Storing data

We hold personal data relating to a parent, carer or pupil throughout the duration of a pupil's attendance at Castle Primary School. The pupil file will follow the pupil when that pupil leaves the school. However, it will be necessary to retain some data and this will be kept in line with our retention policy which can be viewed upon request by contacting the school. When personal data is no longer needed, we will dispose of it in a secure manner.

In order to protect data whilst it is in our possession we have data protection policies and procedures in place. These include strong organisational and technical measures and these are reviewed regularly. For further information on how data is protected please contact the school's Data Protection Officer whose contact details can be found at the end of this privacy notice.

6. Who we share parent, carer and pupil information with

We do not share information about parents, carers or pupils with any third party without consent unless the law and our policies allow us to do so.

Where there is a legal requirement to do so, or it is otherwise necessary and it complies with data protection law, we may share personal information with:

- educators and examining bodies
- Ofsted
- suppliers and service providers – to enable them to provide the services contracted
- central government departments or agencies
- local authorities – to meet our legal obligations to share certain information such as safeguarding concerns and exclusions

- our auditors
- health authorities
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- police forces, courts, tribunals
- professional bodies
- a counsellor or educational psychologist as and when appropriate
- charities and voluntary organisations
- our Data Protection Officer
- school governors – when necessary, e.g. as part of a complaint process
- a pupil's representative or their parent's or carer's representative
- the pupil's previous and future schools.

Castle Primary School contracts with a number of carefully vetted suppliers and service providers with whom personal data is also shared. Such data is only shared once appropriate assurances have been obtained regarding the way in which the shared data will be processed and protected and the data shared is minimized so that only information that is absolutely necessary is provided. The school may share data with the following suppliers and service providers:

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.	European Union	The pupil's family School staff Senior Leadership Team Safeguarding Officers, Social Services, Police and justice system

		Access is controlled and limited depending on the user level of authority.		
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.	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.

		Any or all data that you / your teachers upload to the Website.		
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 Backups to G-drive Google workspace for education	Backs up personal and shared school documents	To provide backups which are encrypted on the storage platform (G-Drive)	EEA When transferring data outside EEA legal frameworks are complied with, see G-drive Privacy Notice.	Google employees, contractors and agents
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 3rd 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
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	Ths 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.	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	UK & EU	Digital photos and documentation will be shared with parents. This will also be retained by the school to evidence learning

	Name of parent and their email address	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.		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.

The Department for Education

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 pupils with the DfE either directly or via our local authority for the purpose of those data collections, under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. Data shared with the DfE underpins school funding and educational attainment policy and monitoring. An example of the information we share with our local authority would be safeguarding concerns or exclusions. We may also 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. All data is transferred securely and held by the DfE under a combination of software and hardware controls, which meet the current government security policy framework. For more information, please see section 10 'How Government uses your data'.

Overseas transfers

Should we need to transfer personal data to a country or territory outside the European Economic Area, we would do so in accordance with data protection law.

The information sharing duty

Since October 2026, all school staff have been bound by a new legal duty to share information if it could help safeguard a child or promote their welfare. Known as the information sharing duty, it introduced a clear legal expectation that staff *must* share information if that sharing could help safeguard a child or promote their welfare.

7. Additional information for children in need and looked-after children

In addition to the details set out in this privacy notice, this section explains how we use supplementary information relating to children in need and looked-after children.

The categories of children in need and looked-after children information that we collect, hold and share include:

- episodes of being a child in need (such as referral information, assessment information, Section 47 information, Initial Child Protection information and Child Protection Plan information)
- episodes of being looked after (such as important dates and information on placements)
- outcomes for looked after children (such as whether health and dental assessments are up to date, strengths and difficulties questionnaire scores and offending)
- adoptions (such as dates of key court orders and decisions)
- care leavers (such as their activity and what type of accommodation they have)

We use this additional personal data to:

a) support these children and monitor their progress
b) provide them with pastoral care
c) assess the quality of our services
d) evaluate and improve our policies on children's social care.

Under the UK General Data Protection Regulation (UK GDPR) the lawful basis we rely on for all of these purposes when processing this additional information is that it is processed in accordance

with the legal basis of public task. Collecting this data is necessary to perform tasks that the school are required to perform as part of their statutory function.

We share children in need and looked-after children information with:

- the Department for Education (DfE)
- our local authority
- the National Health Service (NHS)
- other appropriate support services as necessary to meet a pupil's individual needs.

We do not share information about our children in need or looked-after children with anyone without consent unless the law and our policies allow us to do so. We share children in need and looked-after children's data with the Department for Education on a statutory basis; under Section 83 of the 1989 Children's Act, Section 7 of the Young People's Act 2008 and also under section 3 of The Education (Information About Individual Pupils) (England) Regulations 2013. The data that we lawfully share with the DfE through data collections helps to develop national policies, manage local authority performance, administer and allocate funding and identify and encourage good practice. To find out more about the data collection requirements placed on us by the DfE go to:
Looked-after children: https://www.gov.uk/guidance/children-looked-after-return
Children in need: https://www.gov.uk/guidance/children-in-need-census.

8. Requesting access to your personal data and your data protection rights

Under data protection legislation, parents and carers have the right to request access to information held about them by making a Subject Access Request.

Parents can also make a Subject Access Request with respect to their child's data where the child is not considered mature enough to exercise their rights over their own data (widely considered to be under the age of 12) or where the child has provided consent.

If you make a Subject Access Request and we do hold information about you or your child, we will:

- give you a description of the information held
- tell you why we are processing it and for how long we will keep it
- explain where we got it from, if not from you or your child
- 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.

Depending on the lawful basis under which personal data is held, parents, carers and pupils may also have the right to:

- object to processing of personal data if it is likely to cause, or is causing, damage or distress
- prevent processing of your personal data for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances: have personal data erased or destroyed, restrict the processing of data and have inaccurate personal data rectified
- seek redress, either through the Information Commission's Office, or through the courts.

In certain circumstances individuals also have the right for their personal information to be transmitted electronically to another organisation.

If you would like to make a Subject Access Request or exercise another of the above rights, please contact the school or our Data Protection Officer whose contact details are listed at the end of this notice.

9. Withdrawal of consent

Where we have obtained consent to use personal data, that consent can be withdrawn at any time by contacting the school:

Castle Primary School
1 Barrington Street
Tiverton
Devon
EX16 6QR

Email: admin@castletiverton.school
Telephone: 01884 253398

10. Lodging a complaint

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 raise this with the school in the first instance by contacting our Data Protection Officer (see Contact Us below) to express your concerns.

In compliance with the Data (Use and Access) Act 2025 (DUAA) we will acknowledge receipt of the complaint within 30 days and take appropriate steps in response.

However, if you remain dissatisfied after we have replied to your concerns you may then complain to the Information Commission's Office:

- online at https://ico.org.uk/concerns/
- by phoning 0303 123 1113
- by writing to the Information Commission's Office, 4th Floor, No.3 Circle Square, 5 Hawkshaw Street, Manchester M1 7BL.

11. Last updated

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This version was last updated on 22nd November 2026.

12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer (DPO):

Alvin Scott (DPO)
Copplestone Primary School
Bewsley Hill
Copplestone
Crediton
Devon
EX17 5NX

Email: dpo@devonmoorsfederation.devon.sch.uk

13. How the Government uses your data

The pupil data that we lawfully share with the DfE through data collections:

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

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

The National Pupil Database (NPD)
Much of the data about pupils in England goes on to be held in the National Pupil Database (NPD).

The NPD is owned and managed by the Department for Education and contains information about pupils in schools in England. It provides invaluable evidence on educational performance to inform independent research, as well as studies commissioned by the department.

It is held in electronic format for statistical purposes. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

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

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

- schools
- 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

For more information about the Department's NPD data sharing process, please visit:
https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

Organisations fighting or identifying crime may use their legal powers to contact the DfE to request access to individual level information relevant to detecting that crime. Whilst numbers fluctuate slightly over time, the DfE typically supplies data on around 600 pupils per year to the Home Office and roughly 1 per year to the Police.

For information about which organisations the Department has provided pupil information, (and for which project) or to access a monthly breakdown of data share volumes with Home Office and

the police please visit the following website: https://www.gov.uk/government/publications/dfe-external-data-shares

How to find out what personal information the DfE holds about you
Under the terms of the Data Protection Act 2018, you are entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter

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