

Privacy Notice (How we use pupil information)

When your child starts at school and, as they continue to progress through the education system, we ask for and collect data in order to fulfil certain legal obligations and to support your child with their education, as well as their personal and social development. We take our responsibilities in this respect very seriously and your data is only shared with outside authorities where we are either legally required to do so, or to inform other agencies who are also involved in supporting your child whilst at school. There may also be times where medical information needs to be shared in the event of an emergency.

We have policies and procedures in place to ensure that we store and transmit all data in a secure way to protect your child's rights. A copy of our Secure Data Handling Policy, which covers this, can be viewed on the school website.

The purpose of this Privacy Notice is to inform you about the data we hold, who we share it with, why we share it and how long we retain it all. We are also, by law, required to advise you of the 'lawful basis/bases' under which we collect and process the data, as defined by the 'General Data Protection Regulations Act (GDPR)'. Below you will find a general outline of the data we hold but more detailed information can be found in our audit document which forms Appendix A (Pupil Data For Privacy Notice) of this Privacy Notice, this can be viewed on the school website, or a paper copy can be requested from the office.

The data that we collect about your child is defined by the GDPR as 'personal data' and in some cases is also called 'special category data', data which is perceived as being more sensitive (e.g. data on ethnicity and religion as well as medical data).

The categories of pupil information that we process include:

- 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, concern sheets, Child Protection Plans and professional involvement)
- special educational needs (including the needs and ranking as well as reports and support provided by external agencies and 'Educational Health Care Plans')
- medical and administration (such as doctor's information, child health, dental health, allergies, medication and dietary requirements)
- attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended)
- assessment and attainment (such as phonics results and any relevant results)
- behavioural information (such as exclusions and any relevant alternative provision put in place or records of any major breaches of school policy)

This list is not exhaustive, to access the current list of categories of information we process please see [insert website link](#) for our current privacy notice.

Why we collect and use pupil information

We collect and use pupil information, for the following purposes:

- a) to support pupil learning
- b) to monitor and report on pupil attainment progress
- c) to provide appropriate pastoral care
- d) to assess the quality of our services
- e) to keep children safe (food allergies, or emergency contact details)
- f) to support the work of other external organisations involved in the support of your child
- g) to meet the statutory duties placed upon us for the Department for Education (DfE) data collections.

In addition, throughout the school year we also take photograph and videos of pupils which are used:

- for displays around the school
- within our school prospectus and on our school website
- reports for sporting events, school plays or other purposes within school publications and the general media.

Under the [UK General Data Protection Regulation \(UK GDPR\)](#), the lawful bases we rely on for processing pupil information are:

- to fulfil our duties as a public authority, which is defined as our **‘public task’**
- in order to ensure that we provide your child with the right level of support in order for them to progress well during their time at school, which is defined as our **‘legitimate interest’**
- in the case of an emergency where your child might be in need of medical help and we are unable to contact you, which is defined as their **‘vital interest’**

We collect and use ‘special categories of personal data’ under the following ‘lawful bases’ as defined within the GDPR:

- Article 9(2)(a): where you have understood the reason for us requesting the data and have given your consent to us doing so for the purpose specified.
- Article 9(2)(b): where processing is necessary for the purposes of carrying out the obligations in the area of social protection law
- Article 9(2)(c): that processing is necessary to protect the vital interests of your child or of another persona where you or your child are physically or legally unable to give consent.
- Article 9(2)(d): that processing is carried out in the course of our legitimate activities, with appropriate safeguards.

For the taking and use of photographs and/or videos of pupils our lawful basis as defined within the GDPR is ‘consent’. We will write to you when your child starts at our school to ask for your consent and will supply you with more detail.

Collecting pupil information

We collect pupil information via the registration forms you complete for your child/ren and Common Transfer File/s (CTF) or secure file transfer from previous schools.

Pupil data is essential for the schools’ operational use. Whilst the majority of pupil information you provide to us is mandatory, some of it requested on a voluntary basis. In order to comply with the data protection legislation, we will inform you at the point of collection, whether you are required to provide certain pupil information to us or if you have a choice in this.

Storing pupil data

We hold the majority of pupil data for the time that your child remains at our school. When they transfer to another primary school and/or on to a secondary school, their data is also transferred. Their final school will hold the majority of pupil data (contained within their individual pupil files) until they reach the age of 25. Some data is held for a shorter period of time and is thereafter destroyed. Our pupil data is held securely for the set amount of time shown in Appendix 1.

Who we share pupil information with

We routinely share pupil information with:

- schools that the pupil's attend after leaving us
- our local authority
- the Department for Education (DfE), Ofsted
- Capita SIMS
- the school nurse, Speech and Language Practitioners, NHS and HCRG Care Group, Educational psychologists, MASH, Social Service/social workers, CAMHS, the police, Wiltshire SSENS, Group Call, Provision Map (EduKey), Insight, Medical Tracker.
- Supply staff
- CPOMS
- IT contractor - EFXS
- Perspectivelite, Standards Testing Agency, NCA tools, NFER, Fischer Family Trust, ASP (Assessing School Performance), Provision Map (Edukey), Insight.
- IT Intervention providers e.g. Accelerated Reader, Nessy, Purple Mash, Education City, Times Table Rock Stars, Espresso, White Rose, 2Simple 2Build a profile, Classroom monitor, No More Marking, Talking Times Tables, Number Sense Maths.
- Wonde – a data sharing platform for DfE, Wiltshire Council, Group Call, Insight, some intervention providers and Evouchers, Medical Tracker.
- Dropbox (group document storage facility)
- Class dojo (Online behaviour management system)
- School website and ParentMail (where consent has been given for photographs to be used).

Why we regularly share pupil information

We do not share information about our pupils with anyone without consent unless the law and our policies allow us to do so.

Department for Education (DfE)

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 Department for Education (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.

All data is transferred securely and held by the Department for Education (DfE) under a combination of software and hardware controls, which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

For privacy information on the data the Department for Education collects and uses, please see : <https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

Requesting access to your personal data

The UK GDPR gives parents and pupils certain rights about how their information is collected and used. To make a request for your personal information, or be given access to your child's educational record, contact Mrs Beaumont (Admin and Finance Officer) at Ludgershall Castle Primary School (01264 790375) or Mrs Beer (Data Protection Officer) on 01980 607007.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

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 [raise a concern with ICO](#).

For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

Withdrawal of consent and the right to lodge a complaint

Where we are processing your personal data with your consent, and where consent is the lawful basis for using the data (e.g. photographs and videos), you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting Mrs Beaumont (Admin and Finance Officer) at Ludgershall Castle Primary School (01264 790375) or by email to admin@ludgershallcastle.wilts.sch.uk.

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 14th November 2025.

Contact

If you would like to discuss anything in this privacy notice, please contact: Mrs Beaumont (Admin and Finance Officer) at Ludgershall Castle Primary School (01264 790375) or by email to admin@ludgershallcastle.wilts.sch.uk.

How Government uses your data

The pupil data that we lawfully share with the Department for Education (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 (DfE) (for example; via the school census) go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

The National Pupil Database (NPD)

The NPD is owned and managed by the Department for Education (DfE) and contains information about pupils in schools in England. This information is securely collected from a range of sources including schools, local authorities and awarding bodies.

The data in the NPD is provided as part of the operation of the education system and is used for research and statistical purposes to improve, and promote, the education and well-being of children in England.

The evidence and data provide DfE, education providers, Parliament and the wider public with a clear picture of how the education and children's services sectors are working in order to better target, and evaluate, policy interventions to help ensure all children are kept safe from harm and receive the best possible education.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-pupil-database-npd-privacy-notice/national-pupil-database-npd-privacy-notice>

Sharing by the Department for Education (DfE)

DfE will only share pupils' personal data where it is lawful, secure and ethical to do so. Where these conditions are met, the law allows the Department for Education (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

For more information about the Department for Education's (DfE) 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 Department for Education (DfE) to request access to individual level information relevant to detecting that crime.

For information about which organisations the Department for Education (DfE) 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 Department for Education (DfE) holds about you

Under the terms of the UK GDPR, you are entitled to ask the Department for Education (DfE):

- 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 for Education (DfE), you should make a 'subject access request'. See the guide for details:

<https://www.gov.uk/government/publications/requesting-your-personal-information/requesting-your-personal-information#your-rights>

Further information on what personal information the Department for Education (DfE) holds about you published in the privacy notices for early years foundation stage to key stage 3, and key stage 4 and 5 and adult education. These are available below:

<https://www.gov.uk/government/publications/privacy-information-early-years-foundation-stage-to-key-stage-3>

<https://www.gov.uk/government/publications/privacy-information-key-stage-4-and-5-and-adult-education>

To contact the Department for Education (DfE): <https://www.gov.uk/contact-dfe>