KEYS Academy Trust

TKAT Parents / Carer Privacy Notice

July 2026

KEYS Academy Trust
Unlocking the future

Version control summary and overview details

TKAT Statutory Policy • All schools require a policy on this area. • There should be no changes to the core text. • LGBs will minute that they have noted Trust approval and will adopt the policy effective immediately. • This is a Trust policy to be implemented by all schools within The Keys Academy Trust to ensure a consistent approach for all.
Version control Version 2 • Minor amendments to wording but no fundamental change • Complaints section revisited and updated information added

Reviewed by (Trust Officer)	Hester Wooller, CEO
Approved by TKAT Trustee Committee:	Trust Board
Trust date of approval:	Jul 26
Trust date of next review:	Jul 27

TKAT vision
We are a family of distinctive schools at the heart of the diverse communities we serve. In line with our Christian ethos, we aspire to excellent learning and pastoral care for pupils and staff and are committed to being open and welcoming to all.

Key areas of note
Please note the following, which will be applicable throughout the policy:

- Any reference to 'headteacher' should read as whatever title is relevant to the school using the policy (i.e. Executive Headteacher/Head of School or Headteacher). Anything else will be explicitly referenced within the policy.
- Any reference to 'everyone' to staff, trustees, local governors and pupils.
- Any reference to 'we' should be read as The Keys Academy Trust.
- Any reference to 'parents' should be read as 'parents, carers and guardians'.

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1. Privacy Notice for Parents/Carers

1.1 Under data protection law, individuals have a right to be informed about how the school uses their personal data. This privacy notice explains how we collect, use, store, share and retain personal data about pupils, parents and carers.
The Keys Academy Trust are the 'data controller' for the purposes of data protection law.

1.2 Our named school contact is Sarah Cohen Our Data Protection Officer is SAMpeople (see 'Contact us' below). Independent assurance is provided by SAMpeople.

2. The personal data we hold

2.1 Personal data that we may collect, use, store and share (when appropriate) about pupils, parents and carers includes, but is not restricted to:

- Contact details, contact preferences, date of birth, identification documents
- Results of internal assessments and externally set tests
- Pupil and curricular records
- Characteristics, such as ethnic background, eligibility for free school meals, or special educational needs, child protection information
- Exclusion information
- Details of any medical conditions, including physical and mental health
- Attendance information
- Safeguarding information
- Details of any support received, including care packages, plans and support providers
- Photographs
- CCTV images captured in school
- Emergency Contact details for parents and carers

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

We also hold parent/carer information such as: name, contact details (email, phone number), address.

3. Why we use this data

3.1 We collect this data in accordance to requirements set out in certain laws/regulations including but not limited to: the Education Act 2005; Safeguarding Vulnerable Groups Act 2006 and the Keeping Children Safe in Education guidance. We use this data to:

- Support pupil learning
- Monitor and report on pupil progress
- Provide appropriate pastoral care
- Protect pupil welfare
- Assess the quality of our services
- Administer admissions waiting lists
- Carry out research
- Comply with the law regarding data sharing
- To be able to contact you in the event of an emergency

4. Our legal basis for using this data

4.1 We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest or in the exercise of official authority

4.2 If we rely on our legitimate interests as a legal basis, we will explain those interests to you and tell you why they are not overridden by your rights and freedoms. Where we process special category data such as health or ethnicity, we will identify both the lawful basis and the additional condition for processing, such as safeguarding obligations or explicit consent where appropriate.
Less commonly, we may also process pupils' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's vital interests (or someone else's interests)

4.3 Where we have obtained consent to use parent, carer or pupils' 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.

4.4 Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

5. Collecting this information

5.1 While most of the information we collect about pupils is mandatory, some information is optional.
We regularly request updated information from parents, via Arbor.
We ask parents and carers to promptly inform us of any changes to their or their child's personal information, so our records remain accurate and up to date.

6. How we store this data

6.1 We keep personal information about pupils while they are attending our school. We may also keep it after they leave if this is necessary to comply with our legal obligations or for another lawful purpose. We will not retain personal data for longer than necessary for the purposes set out in this notice. Specific retention periods are set out in our Data Retention Policy and retention schedule, available on our school website. Data will be securely destroyed when it is no longer required in line with our retention schedule and statutory obligations.

6.2 We have implemented appropriate technical and organisational measures to protect your personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, or access.

7. Data sharing

7.1 Why we regularly share pupil information: We do not share information about our pupils with anyone unless we have a lawful basis to do so, or unless the law requires or allows us to share it.

7.2 Department for Education

7.2.1 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.

7.2.2 All data is transferred securely and held by DfE under a combination of software and hardware controls, which meet the current government security policy framework.

7.2.3 In some circumstances, the school may also share data with:

- Educators and examining bodies
- Our regulator (Ofsted)
- Suppliers and service providers – to enable them to provide the service we have contracted them for
- Financial organisations
- Survey and research organisations
- Health authorities (NHS)
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

7.3 We may also share data with other professionals/contractors if a pupil has signed up to a club or event (e.g. a musical instrument tutor).

8. Transferring data internationally

8.1 Where we transfer personal data outside the United Kingdom, we will ensure appropriate safeguards are in place, such as a UK adequacy regulation, the UK addendum to the EU standard contractual clauses, or another valid transfer mechanism under UK data protection law..

9. Parents, Carers and pupils' rights regarding personal data

9.1 Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.

9.2 Parents/carers 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 (usually under the age of 12), or where the child has provided consent.

9.3 Parents also have the right to make a subject access request with respect to any personal data the school holds about them.

9.4 If you make a subject access request, and if we do hold information about you or your child, 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 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

9.5 Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

9.6 If you would like to make a request please contact our named school contact or data protection officer.

9.7 Parents/carers also have a legal right to access to their child's educational record. To request access, please contact our school reception on <<Insert Contact Details>>.

10. Other rights

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

- Be informed about how their data is used
- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent it being used to send direct marketing
- Object to decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations

10.2 To exercise any of these rights, please contact our named school contact or Data Protection Officer.

11. Automated Decision Making and Profiling

11.1 We do not make decisions about pupils, parents, or carers based solely on automated processing or profiling. If this changes, we will inform you and explain your rights, including the right to request human intervention.

11.2 Before introducing new systems or processes that may affect your privacy, such as new digital platforms or online parental engagement tools, we will carry out a Data Protection Impact Assessment (DPIA) to identify and mitigate risks.

12. Data Retention/Destruction

12.1 The data will not be held for longer than is necessary and will be disposed of safely when it is no longer required.

13. Complaints

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

13.2 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 us in the first instance.

13.3 To make a complaint, please contact our named school contact – <<Insert Name>>.

13.4 Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/make-a-complaint/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

14. Contact us

14.1 If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our data protection officer, Ben Cain:

Phone:	01924 827869	SAMpeople
Email:	dpo@feps.co.uk	First Floor, Unit A, Cedar Court Office Park
Mail:	Data Protection Officer	Denby Dale Road, Wakefield. WF4 3FU