KEYS
Academy Trust

TKAT Local Governors, Trustees and Other Volunteers 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 governors, trustees and other volunteers

1.1 Under data protection law, individuals have a right to be informed about how The Keys Academy Trust uses their personal data. This privacy notice explains how we collect, use, store, share and retain personal data about local governors, trustees and other volunteers.The Keys Academy Trust is the data controller for the purposes of data protection law. Our correspondence address is Earley St Peters C of E Primary School, Church Road, Earley, Reading, RG6 1EY.Our data protection officer is SAMpeople (see 'Contact us' below).

2. The personal data we hold

2.1 We process data relating to those volunteering at our School/Trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- References
- Evidence of qualifications
- Employment details
- Information about business and pecuniary interests
- Records of appointment, attendance and training
- IP addresses and device identifiers

2.2 We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This may include information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Disability and access requirements
- Criminal record information where appropriate

3. Why we use this data

3.1 The purpose of processing this data is to support the School/Trust to:

- Establish and maintain effective governance
- Meet statutory obligations for publishing and sharing governors' and trustees' details
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Undertake equalities monitoring
- Ensure that appropriate access arrangements can be provided for volunteers who require
- Them

4. Our lawful basis for using this data

4.1 We only collect and use personal information about you when the law allows us to. Our lawful basis for using this data is usually one or more of the following:

- Comply with a legal obligation
- Carry out a task in the public interest or in the exercise of official authority
- Legitimate interests, where appropriate and where our interests are not overridden by your rights and freedoms

4.2 Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

4.3 We may rely on legitimate interests where it is necessary to support the administration and coordination of governance activities, for example:

- clerking service providers require information to coordinate meetings and distribute
- information
- a centralised IT system is used for the coordination of governance activities (e.g. GovernorHub)
- training providers require information to coordinate training sessions and distribute
- information
- relevant associations require information to be able to distribute relevant information
- directly to trustees and governors (e.g. National Governance Association)

4.4 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.

4.5 Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify our use of your data.

5. Collecting this information

5.1 While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

5.2 Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

6. How we store this data

6.1 Personal data is stored in accordance with our Data Protection policy and Data Retention policy. We keep personal data only for as long as necessary for the purposes for which it was collected, and in line with our retention schedule.

6.2 We maintain a file to store personal information about all volunteers. The information contained in this file is kept secure and is only used for purposes directly relevant to your work with the Trust/School.

6.3 When your relationship with the school or trust has ended, we will retain and dispose of your personal information in accordance with our Data Retention policy, our Data Retention policy sets out how long we keep information and can be found on our website.

6.4 We do not share information about you with any third party without your consent unless the law and our policies allow us to do so, such as where it is necessary to comply with legal obligations, to perform a public task, to pursue legitimate interests, or where you have given consent.

6.5 Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Government departments or agencies – to meet our legal obligations to share information about governors/trustees
- Our local authority – to meet our legal obligations to share certain information with it, such as details of governors
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as governor/trustee support

- Professional advisers and consultants
- Employment and recruitment agencies
- Police forces, courts

7. Transferring data internationally

7.1 Where personal data is transferred outside the UK, we 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.

8. Your rights - How to access the personal information we hold about you.

8.1 Individuals have a right to make a 'subject access request' to gain access to personal information that the School/Trust holds about them.
If you make a subject access request, and if we do 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

8.2 You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

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

9. Other rights

9.1 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 your personal 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
- You have the right to withdraw your consent at any time if processing is based on consent
- Claim compensation for damages caused by a breach of the data protection regulations

9.2 To exercise any of these rights, please contact our named school contact or data protection officer.

10. Responsibilities of governors, trustees and other volunteers

10.1 We are provided with contact details by governors, trustees and other volunteers for the purposes of communication (email addresses, telephone numbers etc). Governors, trustees and other volunteers should inform us in writing of any changes to these details as soon as possible so that are records can be updated and to minimise the risk of the incorrect distribution of personal data.

11. Complaints

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

11.2 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.

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

11.4 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

12. Contact us

12.1 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