KEYS
Academy Trust

TKAT Pupil 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 Pupils

1.1 You have a legal right to be informed about how our school uses any personal information that we hold about you. To comply with this, we provide a 'privacy notice' to you where we are processing your personal data.

1.2 This privacy notice explains how we collect, store and use personal data about you.

1.3 The Keys Academy Trust are the 'data controller' for the purposes of data protection law.

1.4 Our named school contact is <<Insert Name>>. Our Data Protection Officer is SAMpeople (see 'Contact us' below). Independent Assurance is provided by SAMpeople.

2. The personal data we hold

2.1 We hold some personal information about you to make sure we can help you learn and look after you at school.

2.2 For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

2.3 This information includes:

- Your contact details
- Your test results
- Your attendance records
- Your characteristics, like your ethnic background or any special educational needs
- Any medical conditions you have
- Details of any behaviour issues or exclusions
- Photographs
- CCTV images

3. Why we use this data

3.1 We collect this data in accordance with 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 help run the school, including to:

- Get in touch with you and your parents when we need to
- Check how you're doing in exams and work out whether you or your teachers need any extra help
- Track how well the school as a whole is performing
- Ensure you are appropriately safeguarded and look after your wellbeing.

4. Our legal basis for using this data.

4.1 We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- We need to comply with the law
- We need to use it to carry out a task in the public interest (in order to provide you with an education)

4.2 Sometimes, we may also use your personal information where:

- You, or your parents/carers have given us permission to use it in a certain way
- We need to protect your interests (or someone else's interest)

4.3 Where we have permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission, and explain how to go about withdrawing consent.

4.4 For processing outside normal school activities (e.g., third-party apps, events, or AI tools), explicit consent from parents/carers (for pupils under 13) or the pupil (if 13+) is required. Consent can be withdrawn at any time.

4.5 Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

5. Collecting this information

5.1 While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

5.2 We will always tell you if it's optional. If you must provide the data, we will explain what might happen if you don't.

6. How we store this data

6.1 We will keep personal information about you while you are a pupil at our school. We may also keep it after you have left the school, where we are required to by law.

6.2 We have a Data Retention Policy, which sets out how long we must keep information about pupils. This is available on our School Website.

6.3 Data will be securely destroyed when it is no longer required in line with our retention schedule and statutory obligations.

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 the DfE under a combination of software and hardware controls, which meet the current government security policy framework.

7.3 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

7.4 We may also share data with suppliers and service providers – to enable them to provide the service we have contracted them for. Only under legally binding contracts requiring UK GDPR compliance, data security measures, and explicit restrictions on AI/data profiling.

7.5 If artificial intelligence (AI) tools process pupil data (e.g., automated marking, chatbots, or analytics), we will conduct risk assessments and notify parents/pupils in advance.

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

9.1 You can find out if we hold any personal information about you, and how we use it, by making a 'subject access request', as long as we judge that you can properly understand your rights and what they mean.

9.2 If we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and using it, and how long we will keep it for
- Explain where we got it from, if not from you or your parents
- Tell you who it has been, or will be, shared with
- Let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- Give you a copy of the information

9.3 You may also ask us to send your personal information to another organisation electronically in certain circumstances.

9.4 If you want to make a request please contact our named school contact or data protection officer.

10. Your other rights over your data

10.1 You have other rights over how your personal data is used and kept safe, including the right to:

- Say that you don't want it to be used if this would cause, or is causing, harm or distress

- Stop it being used to send you marketing materials
- Say that you don't want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- Have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- Claim compensation if the data protection rules are broken and this harms you in some way
- The right to data portability (e.g. transfer records to another school digitally)

11. Data Retention/Destruction

11.1 Data is retained only as necessary for legal, regulatory, or operational purposes as outlined by our Data Retention Policy. Post-2025, retention periods for digital records (e.g. app data, AI outputs) will not exceed 3 years unless legally required.

12. AI and Digital Tools

12.1 We may use AI-driven tools (e.g., learning analytics, automated feedback) to support education. These tools will never replace human judgment in critical decisions. All AI systems undergo mandatory risk assessments for bias, security, and transparency. Pupils/parents can opt out of AI profiling upon request.

13. Complaints

13.1 We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we've done something wrong.
To make a complaint, please contact our named school contact – <<Insert Name>>.

13.2 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