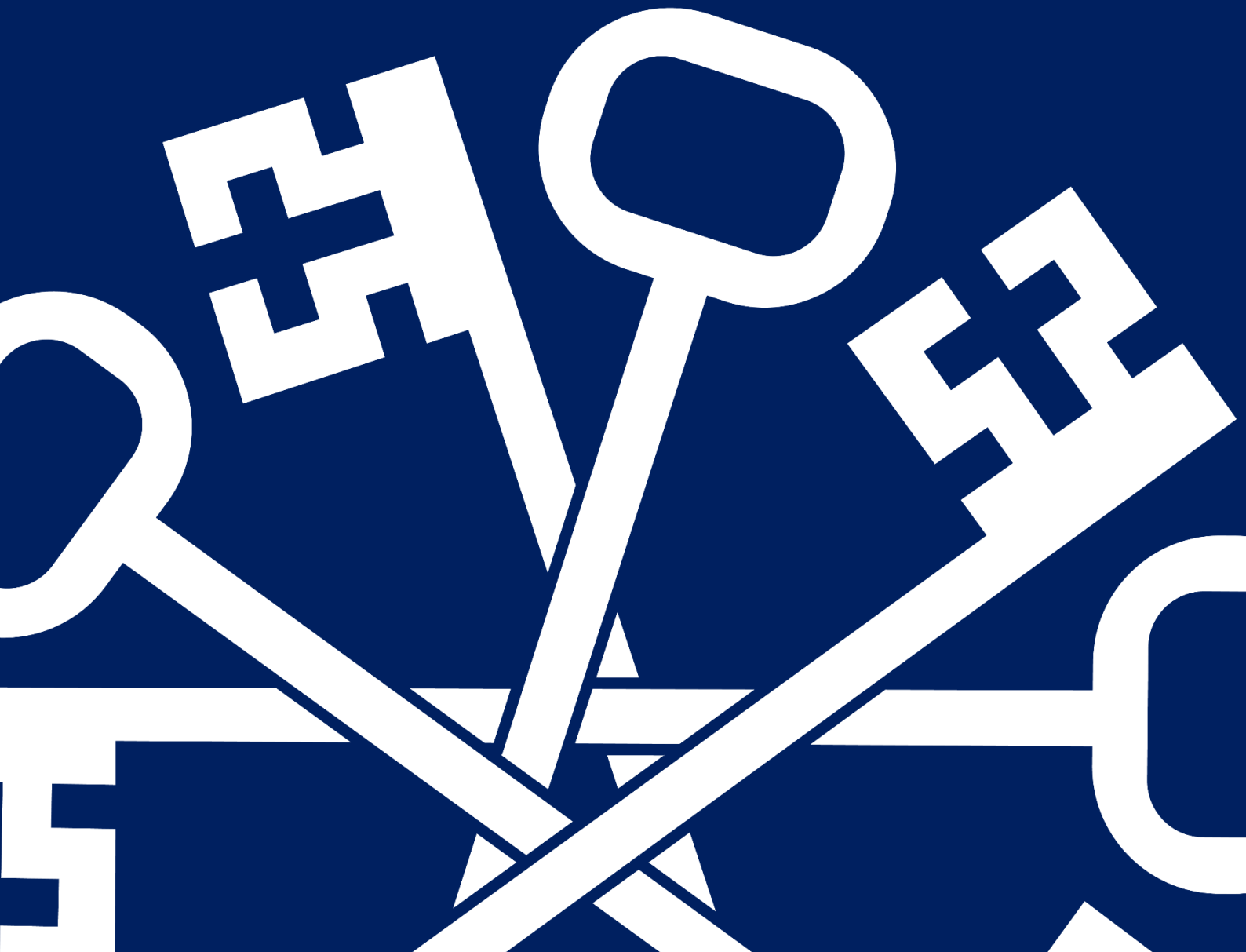




KEYS
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TRUST

Privacy Notice: Primary Academy Pupils and Parents Version 1.2



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1. Policy Statement

- 1.1. At the heart of our mission is the belief that every individual has untapped potential waiting to be unlocked. By fostering an environment that challenges and supports growth, we want to create pathways for social mobility. By providing the right tools, guidance, and opportunities, we enable each person to overcome barriers and reach their fullest potential.
- 1.2. We want our schools to not only places of learning but vibrant communities where every person feels they truly belong. Within this students, teachers, and support staff alike should feel they are developing and succeeding. This success should be an achievable reality for all, irrespective of background or circumstance. It may be quite different for each of us, but the key is the feeling of pride in doing well and enjoyment of the journey.
- 1.3. We are committed to building inclusive environments where the uniqueness of every individual is celebrated, and where collective growth is the norm.

2. Change Summary

- 2.1. No significant changes since first policy iteration.

3. Introduction

- 3.1. This Privacy Notice explains how and why we store personal information about pupils and parents/carers. It provides a guide to parents/carers about our legal obligations and their own rights. Like any organisation which handles personal data, our Trust is defined as a 'Data Controller' and, as such, we are registered with the ICO (Information Commissioner's Office) and we comply with the Data Protection Act. and UK General Data Protection Regulation

4. The Categories of Pupil Information That We Process

For <u>all</u> pupils	Personal Information	Name, Date of Birth, Gender, Year Group, Class, Address, Contacts Dietary needs, dietary preferences Medical practice address and telephone number Medical conditions
	Characteristics	Ethnicity, language, nationality, country of birth
	Attendance Information	Sessions attended, number of absences, reasons for absence
	Academic attainment and progress records	Teacher Assessment grades Statutory assessment results Standardised score results Learning journey evidence (photographs and annotations) Other photographic evidence of learning Reports to parents (mid-year and end of year)
	Other	Pupil Surveys Incidental evidence of pupils' successes (certificates, photographs, named trophies, celebration events)
For <u>some</u> pupils (only if applicable)	Other	Free School Meals eligibility Court Orders Other pupil premium eligibility (such as if the child is looked after) Safeguarding records (incidents, external agency reports Special Educational needs records (professional assessments, external professionals' reports, referrals for external support) Pastoral records (referrals for support both internal and external, notes of discussions with pupils, pupils' jottings of thoughts and feelings) Exclusion information Behaviour incident records
All Parents/Carers*	Personal Information	Names, addresses, telephone numbers, email addresses, relationship to the child (of parents/carers and other given contacts) Free school meals eligibility evidence
	Other	Parents' surveys Letters sent to school Emails sent to school Financial payments, including debt (both manual and electronic)

*this refers to those with legal responsibility for the child

- 4.1. This list is not exhaustive, to access the current list of categories of information please email gdpr@keystrust.org

5. Why We Collect and Use Pupil Information

- 5.1. The personal data collected is essential, for the Trust to fulfil their official functions and meet legal requirements.
- 5.2. We collect and use pupil information, for the following purposes:
- To support pupil learning
 - To keep informed to keep children safe
 - To monitor and report on pupil progress

- d) Safeguarding pupils' welfare and providing appropriate pastoral (and where necessary medical) care
- e) Informing decisions such as the funding of Trusts
- f) Assessing performance and to set targets for Trusts
- g) Giving and receive information and references about past, current and prospective pupils, and to provide references to potential employers of past pupils
- h) Managing internal policy and procedure
- i) Enabling pupils to take part in assessments, to publish the results of examinations and to record pupil achievements
- j) To carry out statistical analysis for diversity purposes
- k) Legal and regulatory purposes (for example child protection, diversity monitoring and health and safety) and to comply with legal obligations and duties of care
- l) Enabling relevant authorities to monitor the Trust's performance and to intervene or assist with incidents as appropriate
- m) Monitoring use of the Trust's IT and communications systems in accordance with the Trust's IT security policy
- n) Making use of photographic images of pupils in Trust publications, on the Trust website and on social media channels
- o) Security purposes, including CCTV
- p) To comply with the law regarding data sharing
- q) To meet the statutory duties placed upon us for DfE data collections

5.3. We use the parents' data:

- a) To assess the quality of our services
- b) To comply with the law regarding data sharing
- c) To ensure financial stability

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

- a) The lawful bases for processing personal data are set out in Article 6 of the UK General Data Protection Regulation. The Trust processed such data because we have:
 - i. (6a) Consent: parents have given clear consent for us to process their (and their child's) personal data for the purposes indicated above.

- ii. (6c) A Legal obligation: the processing is necessary for us to comply with the law (e.g. we are required by law to submit certain teacher assessment information and to safeguard pupils' welfare by sharing information with other agencies).
 - iii. (6d) A duty to safeguard pupils: the processing is necessary in order to protect the vital interests of the data subject (children); (e.g. if we are required to share medical history information with emergency services in the event of an accident or to other agencies when a child may be in danger).
 - iv. (6e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law (e.g. processing attendance information or academic attainment and progress records).
- b) Special Categories of data are set out in Article 9 of the UK General Data Protection Regulation. The Trust processes such data because we have:
- i. (9.2a) explicit consent. In circumstances where we seek consent, we make sure that the consent is unambiguous and for one or more specified purposes, is given by an affirmative action and is recorded as the condition for processing. Examples of our processing include use of pupil photographs for external purposes, pupil dietary requirements, and health information we receive from our pupils who require a reasonable adjustment to access our services.
 - ii. (9.2b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.
 - iii. (9.2c) where processing is necessary to protect the vital interests of the data subject or of another natural person. An example of our processing would be using health information about a pupil in a medical emergency.
 - iv. (9.2f) for the establishment, exercise or defence of legal claims. Examples of our processing include processing relating to any employment tribunal or other litigation.
 - v. (9.2g) reasons of substantial public interest. As a Trust, we are a publicly funded body and provide a safeguarding role to young and vulnerable people. Our processing of personal data in this context is for the purposes of substantial public interest and is necessary for the carrying out of our role. Examples of our processing include the information we seek or receive as part of investigating an allegation.
 - vi. (9.2j) for archiving purposes in the public interest. The relevant purpose we rely on is Schedule 1 Part 1 paragraph 4 – archiving. An example of our processing is the transfers we make to the County Archives as set out in our Records Management Policy.

- 5.5. We process criminal offence data under Article 10 of the UK GDPR.
- 5.6. Our Data Protection Policy highlights the conditions for processing in Schedule 1 of the Data Protection Act 2018 that we process Special Category and Criminal Offence data under.

6. How We Collect Pupil Information

- 6.1. We collect pupil information via registration forms at the start of the school year or Common Transfer File (CTF) or secure file transfer from the previous setting
- 6.2. Pupil data is essential for the Trusts' 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.

7. How We Store Pupil Data

- 7.1. We hold pupil data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see our Data Protection policy.
- 7.2. All confidential information is kept secure either on encrypted, password protected devices or paper copies kept on the Trust site. Once the deadline for retaining information has passed, data kept electronically is deleted and paper copies are destroyed in conjunction with the retention schedule.

8. Who We Share Pupil Information With

- 8.1. We routinely share pupil information with:
 - a) Schools that the pupil attends after leaving us
 - b) Our local authority
 - c) The Department for Education (DfE)
 - d) Standards and Testing Agency (STA)
 - e) Children's Social Care (when safeguarding pupils' welfare)
 - f) External professionals who visit school (such as Educational Psychologists)
 - g) Law enforcement officials such as the Police
 - h) The NHS
 - i) Suppliers and service providers with whom we have a contract
 - i. Voluntary organisations linked to the Trust

- 8.2. Information will be provided to those agencies securely or anonymised where possible.
- 8.3. The recipient of the information will be bound by confidentiality obligations - we require them to respect the security of your data and to treat it in accordance with relevant legislation.

9. Why We Regularly Share Pupil Information

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

10. Department for Education

- 10.1. 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:
- 10.2. Regulation 5 of The Education (Information About Individual Pupils) (England) Regulations 2013.
- 10.3. 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](#).
- 10.4. For more information, please see 'How Government uses your data' section.

11. Local Authorities

- 11.1. We may 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.

12. Standards and Testing Agency

- 12.1. We are required to share data with the [Standards and Testing Agency](#) under the Key Stage 1 and Key Stage 2 assessment and reporting arrangements (ARA). This is a statutory requirement and sharing is done under legal obligation and public task lawful bases.
- 12.2. For general enquiries about the assessment and reporting arrangements, contact the national curriculum assessments helpline on 0300 303 3013 or email assessments@education.gov.uk.

13. Requesting Access to Your Personal Data

- 13.1. Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to your child's educational record, contact your individual school's business manager and gdpr@keystrust.org
- 13.2. Depending on the lawful basis used for processing data (as identified above), you may also have the right to:
- a) have your personal data rectified if it is inaccurate or incomplete;
 - b) request the deletion or removal of personal data where there is no compelling reason for its continued processing;
 - c) restrict our processing of your personal data (i.e. permitting its storage but no further processing);
 - d) object to direct marketing (including profiling) and processing for the purposes of scientific/historical research and statistics; or
 - e) not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you.
- 13.3. If you have a concern or complaint 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 <https://ico.org.uk/concerns/>
- 13.4. For further information on how to request access to personal information held centrally by DfE, please see the 'How Government uses your data' section of this notice.

14. Withdrawal of Consent and the Right to Lodge a Complaint

- 14.1. Where we are processing your personal data with your consent, 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 gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.
- 14.2. Under Section 164A of the Data Protection Act 2018, you have a statutory right to complain if you believe your personal data has been handled inappropriately.
- 14.3. If you wish to raise a concern about how we process your personal data, please contact us directly at gdpr@keystrust.org. We will acknowledge your complaint within 30 days of receipt and take appropriate steps to investigate and respond without undue delay.
- 14.4. If you are not satisfied with our response, you may escalate your complaint to the Information Commission at: [Information Commissioner's Office](#)

15. Contact

- 15.1. If you would like to discuss anything in this privacy notice, please contact: gdpr@keystrust.org or our Data Protection Officer, SchoolPro TLC Ltd at DPO@schoolpro.uk.

16. Version History

VERSION	ACTION	RESPONSIBLE	DATE
1.0	Privacy notice updated with new DPO introduction	Jordan SMITHSON	29/06/2023
1.1	Review in line with policy schedule	DPO	01/06/2024
1.2	Review in line with policy schedule	Niamh WALSH	19/05/2026

