



**“Unlocking the Future”**

## Pupil Privacy Notice

<b>Policy Level and Description:</b>	1	<u>TKAT Statutory Policy</u> NO CHANGES TO THE CORE TEXT ALL Schools require a policy on this topic/area. Only changes to highlighted sections are allowed to the core text – changes will be limited to school name and very limited school-specific details - LGBs to adopt, implement and monitor this policy.	
<b>Reviewed by: (Trust Officer)</b>	Hester Wooller CEO	<b>Reviewed by: (School representative)</b>	Jo Shell Head of School
<b>Approved by: (Trust Committee/Trust Board)</b>	FAPP	<b>Approved by: (LGB/LGB Committee)</b>	LGB
<b>Trust approval date: (dd/mm/yyyy)</b>	08/07/2025	<b>LGB/LGB Committee approval date: (dd/mm/yyyy)</b>	Autumn 2025
<b>Review due: (mm/yyyy)</b>	07/2026		

## **Privacy Notice for Pupils**

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.

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

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

Our named school contact is the Operations Manager. Our Data Protection Officer is Ben Cain (see 'Contact us' below). Independent Assurance is provided by SAMpeople.

## **The personal data we hold**

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

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

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

## **Why we use this data**

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.

### **Our legal basis for using this data.**

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)

### **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)

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.

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.

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.

### **Collecting this information**

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.

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.

### **How we store this data**

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.

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

### **Data sharing**

Why we regularly share pupil information:

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

## **Department for Education**

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

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

We may also share data with suppliers and service providers – to enable them to provide the service we have contracted them for.

Suppliers and service providers – only under legally binding contracts requiring UK GDPR compliance, data security measures, and explicit restrictions on AI/data profiling.

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.

## **Transferring data internationally**

Where we share data with an organisation that is based outside of the United Kingdom, we will protect your data by following data protection law.

## **Your rights**

### **How to access personal information we hold about you**

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.

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

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

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

### **Your other rights over your data**

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)

### **Data Retention/Destruction**

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.

### **AI and Digital Tools**

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.

### **Complaints**

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.

You can make a complaint at any time by contacting our named school contact or data protection officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

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

### **Contact us**

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

Email: [dpo@feps.co.uk](mailto:dpo@feps.co.uk)

Mail: Data Protection Officer

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