KEYS Academy Trust

TKAT Staff 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 staff

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

1.2 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 process data relating to those we employ, or otherwise engage, to work at our school. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details
- Date of birth, marital status and gender
- Next of kin and emergency contact numbers
- Salary, annual leave, pension and benefits information
- Bank account details, payroll records, National Insurance number and tax status information
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Performance information
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Copy of driving licence
- Photographs
- CCTV footage
- Data about your use of the school's information and communications system

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

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Health, including any medical conditions, and sickness records

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. The purpose of processing this data is to help us run the school, including to:

- Enable you to be paid
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Inform our recruitment and retention policies
- Allow better financial modelling and planning
- Enable ethnicity and disability monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body

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. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a 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 identify and communicate those interests to you. Where we process special category data (such as health or ethnicity), we will identify the additional lawful basis for processing, such as employment law obligations or explicit consent.

4.3 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)
- We have legitimate interests in processing the data

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 the school's use of your data.

5. Collecting this information

5.1 While most of the information we collect about staff members is mandatory, some information is optional.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.

5.2 We will not contact third parties to obtain a staff members' personal data without their consent, unless required by law.

5.3 If a staff member fails to provide their data, there may be serious consequences, including the failure to pay salaries and failure to meet legal compliance.

6. Automated Decision Making and Profiling

6.1 We do not make employment decisions based solely on automated processing or profiling. If this changes, we will inform you and provide information about your rights, including the right to request human intervention.

7. How we store this data

7.1 We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

7.2 Once your employment with us has ended, we will retain this file and delete the information in it in accordance with our Data Protection Policy and statutory requirements. The retention policy is available on our School Website.

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

8. Data sharing

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

- Local authority: We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.
- Department for Education (DfE): We share personal data with the Department for Education (DfE) on a statutory basis. This data sharing underpins workforce policy monitoring, evaluation, and links to school funding / expenditure and the assessment educational attainment.

8.2 We are required to share information about our school employees with our local authority (LA) and the Department for Education (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

9. Data collection requirements

9.1 The DfE collects and processes personal data relating to those employed by schools (including Multi Academy Trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

9.2 To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to https://www.gov.uk/education/data-collection-and-censuses-for-schools.

9.3 The department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by: conducting research or analysis, producing statistics, providing information, advice or guidance

9.4 The department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data

- the purpose for which it is required
- the level and sensitivity of data requested
- the arrangements in place to securely store and handle the data

9.5 To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

9.6 For more information about the department's data sharing process, please visit: https://www.gov.uk/data-protection-how-we-collect-and-share-research-data

9.7 To contact the department: https://www.gov.uk/contact-dfe

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

- Your family or representatives
- Educators and examining bodies
- Our regulator (Ofsted)
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- Financial organisations
- Survey and research organisations
- Trade unions and associations
- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies
- Employment and recruitment agencies

9.9 Where third parties are responsible for processing staff members' personal information the school places data protection requirements on those third party providers to ensure data is processed in line with staff members' privacy rights.

10. Transferring data internationally

10.1 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.

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

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

11.2 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

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

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

11.3 Your other rights regarding your data

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

- Be informed about how your data is used
- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for 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
- To exercise any of these rights, please contact our named school contact or data protection officer.

11.4 You also have the right to launch a complaint with the ICO directly.

12. Data Retention/Destruction

12.1 We will not retain your 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, available on our School Website. If you would like further information about our retention periods, please contact the Data Protection Officer.

13. Data Breach Notification

13.1 In the event of a data breach that is likely to result in a risk to your rights and freedoms, we will notify you and the Information Commissioner's Office (ICO) within 72 hours, in accordance with our legal obligations.

14. Complaints

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

14.2 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.

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

14.4 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

15. Contact us

15.1 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