

KEYS GROUP SERVICE USERS (Children’s Education) PRIVACY NOTICE

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| Version | Author | Changes | Date | Release Date |
| 1 | Hannah Calway | Creation of policy | 06/02/2025 |  |

What is the purpose of this document?

Keys Group is a "controller" in relation to personal data. This means that we are responsible for deciding how we hold and use personal information about you. It makes you aware of how and why your personal data will be used, namely for the purposes of caring for you, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK General Data Protection Regulation (UK GDPR).

For the purposes of this notice “Keys Group” “we” or/and “us” means Keys Group Limited (company number 14101282) and its subsidiaries and subsidiary undertakings, any holding companies or parent company of Keys Group Limited and all other subsidiaries and subsidiary undertakings of any holding company or parent company of Keys Group Limited.

# For Pupils

The type of information we hold about you

We process your personal information to meet our legal, statutory and contractual obligations and to provide you with our services. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

The personal data that we may collect from you includes:

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
* Date of birth
* Gender
* Next of Kin
* Photographs (e.g. for school events / yearly photographs)
* Characteristics (such as ethnicity, language and free school meal eligibility)
* Attendance – number of absences / reason for absence
* Assessments and attainments – results in exams
* Behavioural information – such as exclusions and the reason

The Special Category Data we may collect from you includes:

* Health / Medical information including special educational needs – such as on a EHCP
* Sex life
* Sexual Orientation
* Genetic / Biometric Data
* Religious Beliefs
* Race / Ethnic origin
* Criminal Conviction Data

How is your personal information collected?

We collect personal information about candidates from the following sources:

* You, the pupil
* Your parent/s or legal guardian/s
* Previous Schools where transferring
* Local Authorities (such as your social worker if you are under an ECHP)
* Medical professionals (such as GP for sick notes)
* Law Enforcement (if involved in a crime or safeguarding)

How we will use information about you

We use the information we collect about you to provide you with an education and also in line with our obligations to safeguard you whilst in our schools.

For example:

1. Sex Life – we may document for the purpose of safeguarding and ensuring there is no exploitation
2. Health – we must process this to ensure you take any medication due during school time, where you visit the school nurse this will be documented. Allergies would be needed to ensure food is prepared safely and you are kept away from allergens where appropriate.
3. Religion – to support you in prayers and religious activities during the school day
4. Statutory Duties – we are mandated by the Department of Education for certain data collections to ensure your wellbeing and safety. For example:
   1. Attendance data – to ensure you are attending school and support you and your family in this.
   2. Safeguarding – such as bruises / allegations made during the school day.

Where we use CCTV this is collected for the purpose of the prevention and detection of crime to keep both pupils and staff safe.

A detailed list of each type of processing and the lawful basis can be found in Appendix 1

**If we don’t process this personal information**

We only process the information necessary to look after you and ensure that you are receiving an education and are safeguarded from harm. There is some information that we are required by law to collect, such as mentioned above, and other information that we will simply collect during the course of your education and as you develop, for example in discussions on politics. Where we do not need to retain this information, it will not be processed.

Information about criminal convictions

In order to protect yourself, our staff and other pupils it is necessary for us to know of any prior convictions that may impact on keeping you and others safe and we are required to complete a risk assessment to ensure everyone is kept safe.

Whilst in our care, if you are questioned / prosecuted regarding a crime we are required to document the process for safeguarding and ensuring risk assessments are in place to protect those we support and our staff.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

**Why might you share my personal information with third parties?**

We will only share your personal information with third parties where we either have your (or your parent / legal guardian) consent or it is necessary for the purpose of the provision of your education or safeguarding. Wherever possible we will seek your views and listen to any objections you have, however, in some circumstances we will be required by law to share the information with such authorities as the Local Authority / Department of Education.

We would also pass on school records to any future educational establishments.

We may also be required to share your information with law enforcements / the courts. Wherever possible we will inform you of any such disclosure.

Where we provide additional activities the following information may be shared with external agencies:

Alternative Provision

At times it may be necessary to provide alternative provision education, such as at home, where the school is unable to deliver this we will contract with third parties and information will be shared with them in order to continue to provide education. Some special category information may be shared to safeguard you and the individual providing the alternative provision.

Peak Activities

Where we use our Peak Outdoor services for you to engage in activities such as kayaking, wall climbing etc we will need to share information about you to conform to health and safety rules. For example, a disclaimer will need to be filled in declaring certain health conditions. Please see further details on how our Peak service retain data here [Privacy Policy | Peak](https://www.peak.co.uk/about/policies/privacy-policy/)

Day Trips

Where we take you on day trips to places such as swimming pools, museums etc we do not usually share information with the venue. However, if damage is caused or there is an incident we may need to share information for the purpose of recording an incident.

We may also share information such as allergies or access requirements where necessary to ensure your safety at the venue.

Overseas Trips

Where you are taken overseas for educations trips we will share the necessary information to be able to book flights and hotels. This may include information such as allergies or access requirements to ensure that you are able to safely attend and that your needs can be met.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

**How long will you store my information for?**

We only store your information for the minimum necessary time. Different information has different retention schedules and we have policies and procedures in place to adhere to retention schedules. We ensure we follow the applicable laws and best practice guidelines on retention.

For your educational information this is retained until your 25th birthday.

For CCTV, this is retained for 3 months unless required for the purpose a crime, in which it would become part of the incident management and be stored for either 10 or 20 years depending on the severity of the incident.

# Parents / Legal Guardians

The type of information we hold about you

We process your personal information to meet our legal, statutory and contractual obligations whilst your child attends our school. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

The personal data that we may collect from you includes:

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
* Date of birth
* Gender
* Next of Kin
* Photographs (e.g. for school events)
* Characteristics (such as ethnicity, language)
* Behavioural information – such as confrontations with staff or other parents

The Special Category Data we may collect from you includes:

* Health / Medical information– such as on a EHCP as family history
* Sex life
* Sexual Orientation
* Genetic / Biometric Data
* Religious Beliefs
* Race / Ethnic origin
* Criminal Conviction Data

How is your personal information collected?

We collect personal information about candidates from the following sources:

* You, the parent / legal guardian
* Your child
* Previous Schools where transferring
* Local Authorities (such as your child’s social worker)
* Medical professionals (such as GP in Multi-Disciplinary Meetings)
* Law Enforcement (if involved in a crime or safeguarding)

How we will use information about you

We use the information we collect about you in line with our obligations to safeguard your child whilst they are in our schools.

For example:

1. Sex Life – we may document for the purpose of safeguarding and ensuring there is no exploitation of both you or your child.
2. Health – This may be where your child talks about you being ill or where it is listed in an ECHP or where you’ve declared an allergen for a catered event.
3. Religion – this may be where your child has discussed family beliefs or the participation in school religious events.
4. Statutory Duties – we are mandated by the Department of Education for certain data collections to ensure your child’s wellbeing and safety. For example:
   1. Safeguarding – such as bruises / allegations made during the school day.

Where we use CCTV this is collected for the purpose of the prevention and detection of crime to keep both pupils and staff safe.

A detailed list of each type of processing and the lawful basis can be found in Appendix 1

**If we don’t process this personal information**

We only process the information necessary to look after you and ensure that you are receiving an education and are safeguarded from harm. There is some information that we are required by law to collect, such as mentioned above, and other information that we will simply collect during the course of your child’s education and their discussions in class, for example in discussions on politics. Where we do not need to retain this information, it will not be processed.

Information about criminal convictions

In order to protect yourself, our staff, pupils and other parents / legal guardians it may be necessary for us to know of certain prior convictions that may impact on keeping you and others safe and we are required to complete a risk assessment to ensure everyone is kept safe.

Whilst your child is in our care, if you are questioned / prosecuted regarding a crime we are required to document the process for safeguarding and ensuring risk assessments are in place to protect those we support and our staff.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

**Why might you share my personal information with third parties?**

We will only share your personal information with third parties where we either have your (consent or it is necessary for the purpose of the provision of safeguarding. Wherever possible we will seek your views and listen to any objections you have, however, in some circumstances we will be required by law to share the information with such authorities as the Local Authority / Department of Education.

We would also pass on records to any future educational establishments.

We may also be required to share your information with law enforcements / the courts. Wherever possible we will inform you of any such disclosure.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

**How long will you store my information for?**

We only store your information for the minimum necessary time. Different information has different retention schedules and we have policies and procedures in place to adhere to retention schedules. We ensure we follow the applicable laws and best practice guidelines on retention.

For your child’s educational information this is retained until their 25th birthday.

For CCTV, this is retained for 3 months unless required for the purpose a crime, in which it would become part of the incident management and be stored for either 10 or 20 years depending on the severity of the incident.

# Family Members / Friends

The type of information we hold about you

We process your personal information to meet our legal, statutory and contractual obligations. We will never collect any unnecessary personal data from you and do not process your information in any way, other than already specified in this notice.

The personal data that we may collect about you may include:

* Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses.
* Date of birth
* Gender
* Photographs (e.g. for school events you may participate in)
* Characteristics (such as ethnicity / language)
* Behavioural information – such as interactions with staff

The Special Category Data we may collect from you includes:

* Health / Medical information – such as familial history on a EHCP
* Sex life
* Sexual Orientation
* Genetic / Biometric Data
* Religious Beliefs
* Race / Ethnic origin
* Criminal Conviction Data

NB: We will only collect this information in limited circumstances, for example the pupil may discuss information that we are required to document for safeguarding.

How is your personal information collected?

We collect personal information about you from the following sources:

* The pupil
* Their parent/s or legal guardian/s
* You, where you may have interacted directly with the school
* Previous Schools where transferring
* Local Authorities (such as your social worker if you are under an ECHP)
* Medical professionals (such as GP for sick notes)
* Law Enforcement (if involved in a crime or safeguarding)

How we will use information about you

We use the information we collect about you to provide you with an education and also in line with our obligations to safeguard you whilst in our schools.

For example:

1. Sex Life – we may document for the purpose of safeguarding and ensuring there is no exploitation of our pupil
2. Health – This may be listed in familial history on the ECHP
3. Statutory Duties – we are mandated by the Department of Education for certain data collections to ensure your wellbeing and safety. For example:
   1. Safeguarding – such as bruises / allegations made during the school day.

Where we use CCTV this is collected for the purpose of the prevention and detection of crime to keep both pupils and staff safe.

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Information about criminal convictions

In order to protect yourself, our staff and other pupils it may be necessary for us to know of certain prior convictions that may impact on keeping you and others safe and we are required to complete a risk assessment to ensure everyone is kept safe. For example, if you are involved in drop off / pick up.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

**Why might you share my personal information with third parties?**

We will only share your personal information with third parties where we either have your consent or it is necessary for the purpose of the provision of your education or safeguarding. Wherever possible we will seek your views and listen to any objections you have, however, in some circumstances we will be required by law to share the information with such authorities as the Local Authority / Department of Education.

We would also pass on school records to any future educational establishments.

We may also be required to share your information with law enforcements / the courts. Wherever possible we will inform you of any such disclosure.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need-to-know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

**How long will you store my information for?**

We only store your information for the minimum necessary time. Different information has different retention schedules, and we have policies and procedures in place to adhere to retention schedules. We ensure we follow the applicable laws and best practice guidelines on retention.

For educational information this is retained until your 25th birthday.

For CCTV, this is retained for 3 months unless required for the purpose a crime, in which it would become part of the incident management and be stored for either 10 or 20 years depending on the severity of the incident.

# Information Rights

Rights of access, correction, erasure, and restriction

**Your rights in connection with personal information**

Under certain circumstances, by law you have the right to:

* **Request access** to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. However, we cannot provide copies of references provided in confidence.
* **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
* **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
* **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
* **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
* **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact Hannah Calway, Data Protection Office.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO) who is responsible for data protection issues in the UK.

Contact our DPO as follows:

Hannah Calway

[Hannah.calway@keys-group.co.uk](mailto:Hannah.calway@keys-group.co.uk)

07394873580

Maybrook House Second Floor, Queensway, Halesowen, B63 4AH

The ICO can be contacted at: -

Information Commissioner’s Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113 (local rate)

Email: [enquiries@ico.org.uk](mailto:enquiries@ico.org.uk)

**Appendix 1 – Lawful Basis for Processing Table**

|  |  |
| --- | --- |
| Type of Processing | Lawful Basis |
| All demographic data | Article 6(e) “Public Task” |
| Educational Data including attendance, exam results | Article 6(e) “Public Task” |
| Health Data | Article 9(H) “necessary for the purpose of health and social care” – For example, when a pupil becomes unwell in school  Article 9(a) “explicit consent” – For example, administering vaccinations  Article (g) “Reason of substantial public interests (with a basis in law)” – For example, safeguarding information or to support individuals with a particular disability or medical condition. |
| CCTV | Article 6(f) “legitimate Interests” |
| Safeguarding Information | Article 6(e) “Public Task”  Article 9(g) “Reason of substantial public interest (with a basis in law)”  Clause 18, Part 2 Schedule 1 DPA 2018 |
| Photographs | Article 6(a) “Consent” |
| Marketing Emails (to send to you or your parent / legal guardian) | Article 6(a) “Consent” |
| Use in Promotional Materials (such as a prospectus) | Article 6(a) “Consent” |