



Privacy Notice for Staff – How we use your information

2026/27

Who are we?

Keresley Newland are the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes. Keresley Newland are a member as an academy, part of The Futures Trust.

The Futures Trust is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA154781.

You can contact the Academy Trust as the Data Controller in writing at: office@knpa.warwickshire.sch.uk or Keresley Newland Primary Academy, Grove Lane, Keresley, Coventry, CV7 8JZ.

What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about our staff.

What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

What personal information do we process about staff?

The categories of staff information that we collect, hold and share include:

- personal information such as name, employee or teacher number, national insurance number, references, 5 year address history
- special categories of data including characteristics information such as gender, age, ethnic group, dietary requirements, medical conditions
- contract information such as start dates, hours worked, post, roles and salary information
- work absence information such as number of absences and reasons
- qualifications and, where relevant, subjects taught

For what purposes do we use personal information?

We use staff data to:

- develop a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid and receive other staff benefits
- ensure that we can act in an emergency

Collecting staff information

Whilst the majority of staff information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain staff information to us or if you have a choice in this.

What are the legal reasons for us to process your personal information?

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

- Local Authority – to meet our legal obligation to share certain information with it such as safeguarding concerns
- The Department for Education
- Educators and examining bodies
- Ofsted
- Payroll Provider
- Central and Local Government
- Health Authorities e.g. Occupational Health
- Police forces, courts, tribunals
- Professional bodies

1) To comply with the law

We collect and use general purpose staff information in order to meet certain legal requirements and legal obligations placed upon the Academy Trust by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

If you would like a copy of or further information regarding the statutory authorities that underpin our legal obligations, you should contact the Academy Trust in writing.

2) To protect someone's vital interests

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

3) With the consent of the individual to whom that information 'belongs'

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

4) To perform a public task

It is a day-to-day function of the Academy Trust to ensure that staff members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that staff are properly supported and able to do their job.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis. Please see What Are Your Rights with Respect of Your Personal Data.

5) To comply with a contract we have with you or because you have asked us to take specific steps before entering into a contract

We are able to process personal information in order to comply with the contract that we have with you.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 5.

6) We have a legitimate interest

Occasionally we have reasons to process information which fall outside of our usual day-to-day school functions. Details of the type of processing that we may undertake on this basis are set out in Table 6.

You have the right to object to the sharing of information with such agencies. This is not an absolute right and will be assessed on a case by case basis. Please see What Are Your Rights with Respect of Your Personal Data.

Special category personal information

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- 1) Explicit consent of the data subject
- 2) Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- 3) Processing relates to personal data which is manifestly made public by the data subject
- 4) Necessary for establishing, exercising or defending legal claims
- 5) Necessary for reasons of substantial public interest
- 6) Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- 7) Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

Who might we share your information with?

We routinely share staff information with:

- Local Authority – to meet our legal obligation to share certain information with it such as safeguarding concerns
- The Department for Education
- Educators and examining bodies
- Ofsted
- HR and Payroll Provider
- Central and Local Government
- Health Authorities e.g Occupational Health
- Police forces, courts, tribunals
- Professional bodies
- Catering Providers: Taylor Shaw
- Pupils, staff, parents and the school community

- Information Management software:
Apple (iCloud), SIMS, Virtue Technologies Backup, Conkaa Medical Tracker, CPOMS, Wonde, PaperCut, ParentPay, Studybugs, Survey Monkey, InVentry, Google Cloud, Paxton Every HR, Evolve, Salamander, Cloud Design Box, Juniper Education, Access (HCSS), Microsoft 365, Copilot Chat AI & Azure, ParentPay, Coolmilk, Smartlog, EPM, Freshworks, Approval Max, VAT Advisory, Vivup, Xero, XfE, WeTransfer, YouTube
- Educational apps:
Test Base, FFT Aspire, Flash Academy, O Track, Class DoJo, Dynamo Maths, IntoFilm, Times Table Rock Stars, Accelerated Reader, Freckle Maths, Spelling Shed, RWI, SATS Companion, Reading Cloud, No More Marking, Massolit (Scratch), SPaG.com, Showbie, Tapestry, Third Space Learning, Thrive, Reading Eggs, Real PE, Mathseeds
- Schools in The Futures Trust – Barr’s Hill, Camp Hill, Coundon Court, Keresley Grange, Keresley Newland, Parkgate, President Kennedy, Redmoor, Stoke Park and The Hinckley School.
- School Photographer (Hardy’s School Photography)
- Professional Data Destruction company: Enviro Electronics, Green Plan-it
- Our Cyber Security Testing Company: NCC Group, to comply with the DfE’s Cyber Security Standards.

We do not share information about our staff unless the law and our policies allow us to do so.

Please refer to the tables for information about what personal information is shared with which specific third parties.

What do we do with your information?

All personal information is held in a manner which is compliant with data protection legislation. Personal information is only processed for the purpose it was collected. The Academy Trust monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so (as set out above).

How long do we keep your information for?

In retaining personal information, the Academy Trust complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which the Academy Trust are required to retain the information.

A copy of those schedules can be requested from the Trust or School.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

What are your rights with respect of your personal information?

Under data protection law, staff members have the right to request access to information about them that we hold. To make a request for your personal information contact the School Data Protection Officer at Warwickshire Legal Services via email at schooldpo@warwickshire.gov.uk or alternatively;

School Data Protection Officer
Warwickshire Legal Services
Warwickshire County Council
Shire Hall
Market Square
Warwick
CV34 4RL

****Please ensure you specify which school your request relates to.**

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress, please note that this is not an absolute right and you will need to provide reasons for your objection
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations
- rectify incorrect information
- subject to the complaints procedure below, you have the right to complain to the ICO

Data Protection Complaints

We are committed to handling your personal data in a way that is fair, transparent, and in accordance with the law. If you are unhappy with how we have handled your data, this process outlines how you can make a complaint.

How to Make a Complaint

If you have a concern about how your personal data has been handled, please contact our Data Protection Lead (DPL) or our Data Protection Officer (DPO). This gives us the opportunity to investigate and resolve the matter as quickly as possible.

There is no set format for making a data protection complaint. However, submitting your complaint in writing may help us to respond more promptly. Please direct your complaint to:

- **Trust Data Protection Lead (DPL) email:** DataProtection@thefuturetrust.org.uk
- or submit a complaints form via <https://www.thefuturetrust.org.uk/data-protection-complaint-form>
- **Trust Data Protection Officer (DPO) email:** schooldpo@warwickshire.gov.uk

What to Expect from Us

We will acknowledge receipt of your complaint within 30 days. We will, without undue delay, take appropriate steps to respond to your complaint, including making appropriate enquires.

Throughout the process, we will:

- Keep you informed of our progress.
- Request any additional information we may need from you in a timely and proportionate manner.
- Provide you with a clear and comprehensive outcome of our investigation.

If You Remain Unhappy

If you are not satisfied with the outcome of your complaint, or if you feel we have not handled it appropriately, you have the right to complain to the Information Commissioner's Office (ICO). The ICO is the UK's independent regulator for data protection and information rights.

- For more information about the ICO and their complaints process, you can visit their website at ico.org.uk.

Review

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in September 2026. This privacy notice is reviewed annually or earlier in response to statutory changes.

Table 1 – Personal information we are required to process to comply with the law:

Information Type	Relevant legislation	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Staff information, including personal details, N.I number, DBS checks, qualifications, previous criminal convictions	Education Act 2005, Section 114 and accompanying regulations Rehabilitation of Offenders Act 1974	N/A	Secretary of State Department of Education Local Authority Disclosure & Barring Service SIMS Microsoft 365, Copilot Chat AI & Azure Conkaa Medical Tracker	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)	N/A	Health & Safety Executive, and Local Authority Health & Safety team (where necessary) Conkaa Medical Tracker	Legal Obligation
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work Act 1974 and accompanying legislation	N/A	Microsoft 365, Copilot Chat AI & Azure Conkaa Medical Tracker	Legal Obligation
Qualifying Complaint Information	Education Act 2005, Section 11B	N/A	Chief Inspector Microsoft 365, Copilot Chat AI & Azure	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15	N/A	Local Authority Ofsted Microsoft 365, Copilot Chat AI & Azure	Legal Obligation
Potentially All Data Fields (If there is a Cyber Security Vulnerability)	DfE's Cyber Security Standards	<i>Processing is necessary for reasons of substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject</i>	NCC Group	Legal Obligation

Table 2 – Personal information we are required to process as it is necessary to protect someone's vital interests

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Medical information, including allergies & Dietary Requirements	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent OR Necessary for preventative/ occupational medical care	Emergency services Relevant School staff, i.e. Teachers/First Aiders	Vital Interest
Emergency contact details	Necessary for preventative/ occupational medical care	Emergency services Relevant School staff, i.e. Teachers/First Aiders Responsible/First aid trained staff on residential trips	Vital Interest

Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'

Information Type	Special Category – additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Staff Name/Job Title/ School Email Address	N/A	Class DoJo, Juniper Education – School Website, School Photographer – Hardy's School Photography, Survey Monkey, WeTransfer, YouTube	Consent
Staff Address, Date of Birth, Contact Phone Numbers, Email Addresses, NI Number	N/A	Vivup	Consent
Bank Details	N/A	ParentPay, Xero, XfE	Consent
Photographs (Including Video Images)	N/A	Local Press/Media, Parents & Community (Newsletter), Juniper Education – School Website, Microsoft 365, Copilot Chat AI & Azure, School social media channels: (Facebook, Instagram, Twitter) school prospectus, internal school displays, staff photo board, Hardy's School Photography, WeTransfer, YouTube	Consent

Table 4 – Personal information we are required to process because it is necessary to do so in order to perform a public task

Information Type	Special Category - additional lawful	Third Parties with whom we share the information	Lawful reason for
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	reason		sharing
Name, Job Title, School Email Address	N/A	Apple (iCloud), Virtue Technologies Backup, CPOMS, Coolmilk, Dynamo Maths, Evolve, Wonde, Times Table Rock Stars, NHS, Local Authority, Accelerated Reader, Freckle Maths, Spelling Shed, IntoFilm, InVentry, Google Cloud, Paxton Access, RWI, SATS Companion, Compass, Reading Cloud, Test Base, No More Marking, PaperCut, ParentPay, FFT Aspire, Flash Academy, O Track, Salamander, Cloud Design Box, Taylorshaw, Smartlog , Juniper Education - School Website, Studybugs, Massolit (Scratch), Real PE, SPaG.com, Showbie, Tapestry, Third Space Learning, Thrive, Pupils, staff, parents and the school community, Access (HCSS) , EPM, Freshworks, VAT Advisory, Vivup, Xero, XfE, Approval Max, Enviro Electronics, Green Plan-it, Reading Eggs, Mathseeds	Public Task
Gender	N/A	Virtue Technologies Backup, EPM, Freshworks, Enviro Electronics, Green Plan-it,	Public Task
DOB		Virtue Technologies Backup, Access (HCSS), EPM, Freshworks, ParentPay, Enviro Electronics, Green Plan-it,	Public Task
Contact Details		Virtue Technologies Backup, EPM, Freshworks, Enviro Electronics, Green Plan-it,	Public Task
Address, Pay, Bank Details, Start Date, Qualifications, Teacher Reference Number, Sickness Record, Pension, Student Loans	N/A	VAT Advisory, Virtue Technologies Backup, Access (HCSS), Freshworks, Enviro Electronics, Green Plan-it,	Public Task
NI Number	N/A	Virtue Technologies Backup, Salamander, Freshworks, Enviro Electronics, Green Plan-it,	Public Task
DBS: Disclosure Number, Issue Date, Barred List, Right to Work in UK, Employment History	N/A	Virtue Technologies Backup, EPM, Freshworks, Enviro Electronics, Green Plan-it,	Public Task
Performance Management & Disciplinary	N/A	Freshworks, Enviro Electronics, Green Plan-it,	Public Task
Training Records	N/A	SmartLog, Every HR, Freshworks, Microsoft 365, Copilot Chat AI & Azure, Enviro Electronics, Green Plan-it, Training providers	Public Task
Staff Ethnicity	<i>Explicit Consent / Necessary for preventive or occupational medicine.</i>	Local Authority – Confidential Recruitment Monitoring, Diocesan Education Service annual census Freshworks, Virtue Technologies Backup, Enviro Electronics, Green Plan-it,	Public Task & Statistical Purposes
Medical Information (including Dietary Requirements/allergies)	<i>Necessary for preventive or occupational medicine.</i>	SIMS, Virtue Technologies Backup, Conkaa Medical Tracker, Freshworks, Microsoft 365, Copilot Chat AI & Azure, Educaterers, Enviro Electronics, Green Plan-it,	Public Task

Disability	<i>Necessary for preventive or occupational medicine.</i>	Every HR, Freshworks, Microsoft 365, Copilot Chat AI & Azure, Enviro Electronics, Green Plan-it,	Public Task
Photograph	N/A	SIMS, Virtue Technologies Backup, Freshworks, InVentry, Paxton Access, Enviro Electronics, Green Plan-it,	Public Task
Accident Records	N/A	Enviro Electronics, Green Plan-it,	Public Task

Table 5 - Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	The Futures Trust HR Team Coventry City Council Occupational Health, Local Authority Ofsted Microsoft 365, Copilot Chat AI & Azure	Contract
Absence Records (including number of absences, reasons for absence & self-certifications forms)	The Futures Trust HR Team Coventry City Council Payroll services Every HR, Microsoft 365, Copilot Chat AI & Azure	Contract
Disciplinary action taken	The Futures Trust HR Team New employer – upon reference request Microsoft 365, Copilot Chat AI & Azure,	Contract
Grievances	The Futures Trust HR Team Every HR, Microsoft 365, Copilot Chat AI & Azure	Contract
Staff Personal Information i.e. name D.O.B, address, contact details, Emergency contact details	Local Authority (to share employment information), HR and Payroll, Every HR, Microsoft 365, Copilot Chat AI & Azure	Contract
P45 Forms	The Futures Trust HR Team Coventry City Council Payroll services	Contract
Consent Forms i.e. GDPR, Policy Agreement	Microsoft 365, Copilot Chat AI & Azure	Contract
Staff personal bank details	Coventry City Council Payroll services Finance Team for any ad-hoc expenses to be paid Lloyds Bank HR and Payroll, SIMS, Microsoft 365, Copilot Chat AI & Azure	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay &	Every HR, Microsoft 365, Copilot Chat AI & Azure	Contract

promotion recommendations		
Staff Employment Information, i.e. Pension, Student Loan, Payroll Details, Start Date, Qualifications, DBS and Barred List checks	Secretary of State Local Authority Disclosure & Barring Service Teachers' Pensions Local Government Pension Scheme HR and Payroll, Every HR, Microsoft 365, Copilot Chat AI & Azure	Contract

Table 6 - Personal information we process because we have a legitimate interest

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a