

## PRIVACY NOTICE

### 1. Introduction

The Two Counties Trust is the Data Controller for the purposes of information governance within the General Data Protection Regulations. Personal data is held for the purposes of meeting our educational, safeguarding, legal and associated responsibilities. We also hold personal data to comply with our responsibilities as an employer. All of our schools have their own Privacy Notice which is available on their website.

### 2. Consent

The Trust will ask for consent to process data about you. You have a choice to opt in for certain types of data usage and this is made clear. However, some data collected and processed by the Trust is not optional as outlined below.

#### 2.1 Legitimate interests

Legitimate interests means that the processing is necessary for legitimate interests except where the processing is unfair to you. The Trust relies on legitimate interests for many of the ways in which we use information.

Specifically, the Trust has a legitimate interest in:

- Providing educational services to students
- Employment of all staff within the Trust
- Improving the management of the school workforce
- Enabling financial modelling and planning
- Safeguarding and promoting the welfare of students and staff
- Promoting the objects and interests of the Trust
- Ensuring the efficient operation of the Trust
- Compliance with all relevant legal obligations of the Trust
- Keep the whole Trust community informed about events, news and activities

#### 2.2 Necessary for a contract

Information about individuals may be required in order to perform our obligations under our contracts. For example, maintaining a Management Information or Payroll system.

#### 2.3 Legal obligation

Much of our work is governed by legal obligations to supply information to organisations such as the Department for Education, Local Authorities or HMRC. We may also have to disclose information to third parties such as the courts, Disclosure and Barring Service or the police where legally obliged to do so.

### 2.4 Vital interests

For example, to prevent someone from being seriously harmed or killed.

### 2.5 Public interest

We are acting in the public interest as a provider of education. Certain regulations, DfE and Local Authority, health and other guidance require us to process data in the public interest.

### 2.6 Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

## 3. What decisions can you make about your information?

3.1 From May 2018 Data Protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights as follows.

- you may ask what information we hold about you and be provided with a copy. Sometimes we are not able to share all the information as set out in our Subject Access Policy;
- if information is incorrect, you may ask us to correct it;
- you may ask us to delete the information that we hold about you or your child in certain circumstances. For example, where we no longer need the information;
- you may ask us to send you, or another organisation, certain types of information we hold about you in a format that can be read by computer. This does not apply to student records as these are transferred by a DfE process called the Common Transfer File
- our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate we may only use it for limited purposes while we check its accuracy.

## 4. Complaints

If you disagree with any decision that we make about your data you can use our complaints policy, you also have the right to make a complaint to the Information Commissioner, and sometimes to the Information Tribunal or through the court process. Our complaints policy is available on the website.

Review cycle:	Annually
Next review due:	May 2019
Policy owner	Head of HR