David Ross Education Trust

Broadening Horizons

Privacy Notice – Subject Access Requests and Freedom of Information Requests

Document Management Information

Applicable to:	All staff in all Academies and Central Support Services including individuals employed by the Trust, contractors and agency staff. All Members and Trustees.
Dissemination:	The notice will be available to staff via the Trust's Policy Centre.
Implementation:	Applicable to all DRET academies
Training:	On request
Review Frequency:	This notice will be reviewed every three years. It will also be reviewed earlier where required in light of new evidence, legislation or guidance.
Policy Author:	George Selby, Head of Data Protection and Compliance
Executive Policy Owner:	Maria Maltby, Director of Governance
Approval by:	Executive Team
Approval Date:	19 October 2026
Next Review Due:	October 2029

Revision History

Document version	Description of Revision	Date Approved
V0.1	Version for Executive Team review	22 Oct 2020
V1.0	Approved document	22 Oct 2020
V1.1	Minor typographical changes	19 Oct 2026

Contents

Contents 3
1. Introduction 4
2. The Categories of Personal Data DRET Holds for Information Requests 4
3. Why DRET uses this Data 4
4. Our Lawful Basis for Using this Data 5
5. Collecting Information 5
6. How DRET Stores the Data 5
7. Data Sharing 5
8. Transferring Data Internationally 5
9. Your Rights 5
10. Complaints 6
11. Contact Details 6

1. Introduction

1.1. The purpose of this Privacy Notice is to explain how the Trust collects, stores and uses personal data about individuals when responding to Subject Access Requests (SAR) and Freedom of Information Requests (FOI).

1.2. Under the Freedom of Information Act 2000, individuals have the right to request recorded information held by a public authority. Decisions on disclosure should be made with a presumption of openness, although some information may be withheld where an exemption applies, including where disclosure would breach confidentiality or data protection law. Further information can be found in the Trust's Freedom of Information Policy.

1.3. Freedom of Information requests should be made in writing and sent to the Data Protection Officer by email at dataprotection@dret.co.uk. Requests should include the requester's name and an address for correspondence, which may be an email address.

1.4. An individual may ask what personal information the Trust holds about them. This is known as a Subject Access Request. This may include confirmation that their personal data is being processed, access to that data, the purposes of processing, who the data is shared with and the relevant retention periods. Further information can be found in the Trust's Data Protection Policy.

1.5. Subject Access Requests should be made in writing and sent to the Data Protection Officer by email at dataprotection@dret.co.uk. The Trust may need to confirm the requester's identity before responding.

1.6. In order for us to respond to a request, it is necessary for us to collect and process personal information as outlined in this Privacy Notice.

2. The Categories of Personal Data DRET Holds for Information Requests

2.1. The David Ross Education Trust is the data controller for the personal information processed when handling FOI requests and Subject Access Requests.

2.2. For the purposes of dealing with FOI and SARs we will collect and process the following information:

- Your name (if you provide it).
- Contact details you have supplied, including email address, contact telephone numbers or postal address.
- Your request.
- Any other personal data you provide as part of your request for information.

3. Why DRET uses this Data

3.1. We process personal data when handling information requests so that we can identify the request, communicate with the requester, locate relevant information, respond within the statutory timescales and keep an appropriate record of the request and response. FOI requests must normally be responded to within 20 working days. Subject Access Requests must normally be responded to

within one calendar month, although this may be extended where a request is complex or where multiple requests have been received from the same individual.

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:

- Respond to a Freedom of Information request.
- Respond to a Subject Access Request.

4.2. The lawful basis for processing personal data for these purposes is that the processing is necessary for compliance with a legal obligation placed on the Trust as data controller under UK GDPR Article 6(1)(c), the Data Protection Act 2018 and, where relevant, the Freedom of Information Act 2000.

5. Collecting Information

5.1. We collect this information from information you send directly to us.

6. How DRET Stores the Data

6.1. The data collected will be stored securely on the Trust's systems. We control access to systems and networks to prevent unauthorised access to personal information.

6.2. Personal data will be retained in accordance with the retention periods set out in the Trust's Record Retention Policy, including records relating to FOI requests and Subject Access Requests.

7. Data Sharing

7.1. Information provided for FOI requests is shared internally with the service area(s) that the request covers, and may be shared externally with the Information Commissioner's Office where requested by them in order that they may carry out their statutory duties.

7.2. In relation to Subject Access Requests, personal data will only be accessible to relevant staff, for example staff involved in responding to the request, handling any related complaint, HR staff for staff-related requests, or the relevant academy for pupil-related requests. Hard copies of personal information are kept in locked storage and personal data stored electronically is held on the Trust's secure IT network. We do not share personal data provided as part of a Subject Access Request with organisations outside the Trust unless required by law or where external assistance, such as legal advice, is needed.

8. Transferring Data Internationally

8.1. Where we transfer personal data outside the UK and/or the European Economic Area, where applicable, we will do so in accordance with data protection law and ensure that appropriate safeguards are in place.

9. Your Rights

9.1. You have the right to:

- Ask for access to your personal information.
- Ask for rectification of the information we hold about you.
- Ask for the erasure of information about you.

- Data portability i.e. have your personal information transmitted electronically to another organisation in certain circumstances.
- Object to us processing your information.

10. Complaints

10.1. We take any complaints about our collection and use of personal information very seriously. 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 the DPO in the first instance.

10.2. Alternatively, you can make a complaint to the Information Commissioner's Office:

- 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.

11. Contact Details

11.1. If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our DPO, details below:

- George Selby, Data Protection Officer, David Ross Education Trust, dataprotection@dret.co.uk
- The postal address of the Trust is:

  David Ross Education Trust
  Charnwood College
  Thorpe Hill
  Loughborough
  Leicestershire
  LE11 4SQ