

The Together Trust is committed to protecting your privacy when you make contact with us and use any of our services. The following privacy notice explains how we use, store and protect the information we have about Looked After Children (LAC) under the General Data Protection Regulation (GDPR).

The Together Trust has a Data Protection Officer under the GDPR who can be contacted; By email: dataprotection@togethertrust.org.uk
Or by writing: DPO, Together Trust Centre, Schools Hill, Cheadle, SK8 1JE

Who we are

The Together Trust is a charity that offers care, support and special education to children, adults and families.

The Together Trust has a wide range of residential homes and services, located in the North West of England for children, young people and vulnerable adults aged between 5 and 30 years.

The personal data we hold

Personal data that we may collect, use, store and share (when appropriate) about LAC includes, but is not restricted to:

- Name, address, identification documents
- The child's date of birth and sex.
- Relationships Information, Next of kin
- Religion, ethnicity, cultural and linguistic background
- Referral/Assessment Information
- Details of any medical conditions, including physical and mental health
- Safeguarding information
- Details of any support received, including care packages and plans
- Photographs

We may also hold data that we have received from other organisations, including Local Authorities, Health Agencies, Police, Education Providers and Commissioned Delivery Partners

Why we use this data

We use this data to:

- Support children and monitor their progress
- Monitor and report on LAC care
- Provide appropriate pastoral care
- Protect child welfare
- Deliver service planning
- Assess the quality of our services
- Prevent/Detect crime

Our legal basis for using this data

We only collect and use LAC personal data when the law allows us to. Most commonly, we process it where:

- We need to comply with a legal obligation (primarily the Children's Homes Regulations, 2015)
- We have a legitimate interest (i.e. to improve our service care)

Less commonly, we may also process LACs' personal data in situations where:

- We have obtained consent to use it in a certain way
- We need to protect the individual's (or another persons') vital interests (i.e. in a medical emergency).

Where we have obtained consent to use LACs' personal data (i.e. photographs), this consent can be withdrawn at any time. We will make this clear when we ask for consent, and explain how consent can be withdrawn. Some of the reasons listed above for collecting and using LACs' personal data overlap, and there may be several grounds, which justify our use of this data.

Collecting this information

While the majority of information we collect about LACs' is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you or your child, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

How we store this data

We keep personal information about Looked After Children in line with our statutory duties under the Children's Homes Regulations, 2015

These consist of:

- 75 years from DOB for individual case management or 15 years after death of child (where child die under 18)*
- 15 years for personal data kept in any of our operational records

*The Together Trust has a long and rich history and keeps some information after this period for research purposes.

You can request our full retention schedule by contacting our Data Protection Officer.

Data sharing

We do not share information about LAC's with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about LAC's with:

- Our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns and care targets
- The LAC's family and representatives
- Educators
- Our regulator Ofsted
- Suppliers and service providers – to enable them to provide the service we have contracted them for.
- Health authorities and social welfare organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Government Agencies

Transferring data internationally

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

LACs' rights regarding personal data

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

Parents/carers can make a request with respect to their child's information where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents also have the right to make a subject access request with respect to any personal data the Together Trust holds about them.

If you make a subject access request, and if we do hold information about you or your child, 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 or your child
- 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

Individuals also have the right for their personal information to be passed electronically to other organisations in certain circumstances.

Other rights

You also have other rights regarding how your personal data is used and kept safe. The Together Trust has produced a guide 'Know your rights' to explain these in more detail. To exercise any of these rights please contact our Data Protection Officer.

Complaints

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 us in the first instance by contacting our Data Protection Officer.

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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our Data Protection Officer:

- By email: dataprotection@togethertrust.org.uk
- Or by writing: DPO, Together Trust Centre, Schools Hill, Cheadle, SK8 1JE