

Introduction

Whilst our privacy notice(s) already provide some essential reading about when we may need to share a person's information, this page is to provide more detailed information regarding Disclosure requests that the organisation may receive, and how we deal with them.

This information relates to requests received for LTE Group and all of our business units.

What is a Disclosure Request?

A Disclosure Request is when a person or organisation makes a request for information about an individual (or individuals) on an ad-hoc basis. It therefore sits outside of our routine data sharing with our partners and third parties who we regularly work with.

In certain circumstances, the Data Protection Act 2018 provides organisations with exemptions to allow personal data to be disclosed, for example for law enforcement purposes, without the need to notify the individual(s) - (the data subject(s) - or gain consent to do so, including where this data sharing sits outside of the original data processing purposes stated in the relevant privacy notice.

The most common request received of this type by the Group is from the police, to enable investigation and law enforcement.

Requests may also be received from local authorities, government agencies and other authoritative bodies.

What information will we need to be able to consider the request?

Due to the Group providing education to thousands of students to date and employing over 3000 staff at any one time, we will require enough personal information to be able to correctly locate the data/records regarding the individual(s) for whom the request relates.

Police forces have their own template form for requesting personal information, known as a '212' form, which cites the relevant section of the Data Protection Act to allow for the disclosure. We will need this to be submitted containing suitable sufficient information, and signed off at the appropriate level.

The template reference for Greater Manchester Police is '0189B'.

If you wish to make a Disclosure Request

Requests should be sent to dpo@ltegroup.co.uk, containing as much information as possible for us to facilitate the request as quickly as possible for you. We will only consider requests from official corporate email addresses.

Alternatively, requests on official letter-headed paper can be posted to:

LTE Group Data Protection Office
Whitworth House
Ashton Old Road
Openshaw
Manchester
M11 2WH

Who will process my Disclosure Request?

The LTE Group Data Protection Office will take overall responsibility for the request and will either gather and provide the information directly, or where relevant they will work with other teams and departments to collate and provide the information.

How long does it take to process a Disclosure Request?

The Data Protection Office ensure that all requests are appropriately logged and managed with their own case reference number and responded to within as small a timeframe as possible.

Each request is handled individually, and at times there may be factors that have an impact on how quickly we can fulfil a request. For example, there may be delays due to term breaks and planned shutdowns within The Manchester College and UCEN Manchester, if the appropriate teams that need to be involved are out of the business.

What information will be provided?

We will only provide the information which is relevant, necessary and proportionate to the request. For example, if the request only specifies contact details for a person, we will not provide the full record or any other personal information (even if we hold it on file).

How will the information be provided?

We typically provide information via the same medium as how the request is made – for example, by email if the request is submitted via email.

We always provide information as securely as possible, such as on a password-protected document, or via our secure online file sharing system if there are multiple files.

When might we refuse a request?

We may not be able to process a request for the following reasons:

- If we cannot fully verify the requestor and that the request is from a genuine source
- Not enough information is provided to correctly identify the individual(s) for whom the request relates to
- If we do not hold the information
- If insufficient information is provided as to what purpose the request has and why the release of the information is necessary
- If the information requested is excessive and not specific enough (for example, a request for multiple hours of CCTV footage from numerous cameras).

We will always inform a requestor if any of the above is the case.

Where can I get further information?

Please contact dpo@ltegroup.co.uk