



Trust Wide
Data Protection Privacy Notice for Suppliers of Goods and Services

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Abstract	
To be read in conjunction with the Data Protection Policy	

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February 2023	1.0	New	

For the purpose of this policy the following representatives need to sign off this document:	
Role/Department & Responsibilities	Name
Chair of Trust Board	Mike Reddy

Website:	
Yes/No	Yes

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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our academy uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about **suppliers of goods and services that the academy contracts with, including their individual representatives, employees and agents**. References to "you" in this privacy notice cover all of these individuals.

Our trust, Impact Education Trust, First Floor, Unit 12, Longbow Close, Huddersfield, HD2 1GQ, Telephone 01484 799321, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Satswana and is contactable via email Info@satswana.com or by calling 01252 516 898.

2. The personal data we hold

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

- Names, characteristics and contact details
- Details linked to the completion of the Single Central record that we must hold for those suppliers/contractors who are regularly on site
- References, CVs and details of an individual's employment history, if collected as part of a bidding, tendering or engagement process
- Bank details and other financial information where it relates to an individual, such as if you're operating as a sole trader
- Any other personal information necessary to fulfil the terms of a contract we have with you, i.e. DBS check
- Information relating to visits to the academy, e.g. the individual's company or organisation name, arrival and departure time, car number plate

If our contract with you requires you to visit or carry out any work at the academy site, our privacy notice for visitors to the academy will also apply.

We may also collect, use, store and share (when appropriate) information about you that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to:

- Information about any access arrangements that may be required
- Photographs for identification purposes
- CCTV images captured in the academy

3. Why we use this data

We use the data listed above to:

- a) Decide whether to engage you
- b) Fulfil the terms of our contract with you, including payment
- c) Keep accurate records of the suppliers that we use
- d) Identify you while on the academy site, and keep all individuals safe
- e) Keep pupils and staff safe while you are on the academy site
- f) Keep accurate records of visits to the academy

3.1 Use of your personal data for marketing purposes

Where you have given us consent to do so, we may send you marketing information by email or text promoting academy events, campaigns, charitable causes or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

3.2 Use of your personal data in automated decision making and profiling

We do not currently process any personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

4. Our lawful basis for using this data

You may wish to refer to the [ICO's guidance on the lawful basis for processing](#).

Our lawful bases for processing your personal data for the purposes listed in section 3 above are as follows:

- For the purposes of b, c, d, e and f, in accordance with the 'public task' basis – we need to process data to fulfil our statutory function as a academy as set out here:
 - National School Admissions Code 2021
 - Education Act 2011
 - The Equality Act 2010
 - SEND Code of Practice
 - General Data Protection Regulation (GDPR) 2021

- For the purposes of a, c, e and f, in accordance with the 'legal obligation' basis – we need to process data to meet our responsibilities under law as set out here:

- Health & Safety Act 2020 (updated 1974)
 - Education Act 2011
 - General Data Protection Regulation (GDPR) 2021
- For the purposes of a, b and c in accordance with the ‘consent’ basis – we will obtain consent from you to use your personal data
 - For the purposes of c and d, in accordance with the ‘vital interests’ basis – we will use this personal data in a life-or-death situation
 - For the purposes of a, b, c and f, in accordance with the ‘contract’ basis – we need to process personal data to fulfil a contract with you or to help you enter into a contract with us

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you would go about withdrawing consent if you wish to do so.

4.1 Our basis for using special category data

For ‘special category’ data, we only collect and use it when we have both a lawful basis, as set out above, and one of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- We need to protect an individual’s vital interests (i.e. protect your life or someone else’s life), in situations where you’re physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- We need to process it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the processing is in the public interest

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way
- We need to protect an individual's vital interests (i.e. protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent
- The data concerned has already been made manifestly public by you
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights
- We need to process it for reasons of substantial public interest as defined in legislation

5. Collecting this data

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

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, tribunals

6. How we store this data

We keep personal information about you while you/your company work with our academies. We may also keep it beyond your work with an academy if this is necessary. Our records and retention schedule sets out how long we keep information about suppliers.

We have put in place appropriate security measures to prevent your personal information being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

7. Who we share data with

We do not share information about you 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 UK data protection law), we may share personal information about you with:

- Our local authorities – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments or agencies – to meet our legal obligations to share certain information with it, such as audit findings, budget data
- Suppliers and service providers to enable them to provide the service we have contracted them for:
 - Banks – so suppliers can be paid
 - Catering – so systems are integrated and compliance is monitored accurately. To inform allergy data
 - HR & Recruitment support – to deliver a service to the academy(ies)
- Financial organisations - to meet our legal obligations to share certain information with it, such as audit findings, budget data
- Our auditors – to conduct our internal and external scrutiny of systems and processes and demonstrate best value
- Health and social welfare organisations/authorities – to enable them to provide the care which may be required in an emergency
- Security organisations, including police forces, courts and tribunals – to enable investigations to be thoroughly completed

7.1 Transferring data internationally

The Trust and its academies do not transfer data internationally.

8. Your rights

8.1 How to access personal information that we hold about you

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- 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
- 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 in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us (see 'Contact us' below).

8.2 Your other rights regarding your data

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact us (see 'Contact us' below).

9. 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.

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

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

10. 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**:

Our data protection officer is Satswana and is contactable via email Info@satswana.com or by calling 01252 516 898.

11. Links to other policies

- 1.1. Data Protection Policy
- 1.2. Safeguarding & Child Protection
- 1.3. Safer Recruitment
- 1.4. Health & Safety
- 1.5. Records and retention schedule

Sign off	
Adopted by IMPACT Trust Board on:	
Chair of IMPACT Trust Board:	
IMPACT Board Trustee:	
Next Review Date:	