



the
beckmead
trust

Privacy Notice for Suppliers

- nurture
- sustain
- grow

Name of Policy	Privacy Notice for Suppliers
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1. Introduction

Under UK data protection law, individuals have a right to be informed about how our school 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 school contracts with, including their individual representatives, employees and agents**. References to "you" in this privacy notice cover all of these individuals.

Our trust, The Beckmead Trust, 170 Sanderstead Road, 0203 772 8805 (option 3) dpo@beckmeadtrust.org, is the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Dee Fullerton (see 'Contact us' below).

2. The personal data we hold

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

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
- 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
- Criminal records information as required by law to enable you to work with children e.g. DBS checks
- Information relating to visits to the school, e.g. the individual's company or organisation name, arrival and departure time, and vehicle number plate

If our contract with you requires you to visit or carry out any work at the school site, our privacy notice for visitors to the school will also apply. A copy of our Privacy Notice for Visitors can be downloaded from our website.

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 school

We may also hold data about you that we have received from other organisations, including other schools and social services.

3. Why we use this data

We will only use your personal information when the law allows us to. Most commonly, we will 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 school site, and keep all individuals safe
- e) Keep pupils and staff safe while you are on the school site
- f) Keep accurate records of visits to the school
- g) Ensure the safe and orderly running of the school
- h) To manage our workforce and those deployed on site
- i) Personnel management including retention
- j) In order to manage internal policy and procedure
- k) Complying with legal obligations
- l) Carry out necessary administration functions to allow visitors and contractors on site
- m) To monitor and manage access to our systems and facilities in order to protect our networks and for the purposes of safeguarding
- n) To monitor and protect the security of our network and information, including preventing unauthorised access to our computer network and communications systems and preventing malicious software distribution
- o) To answer questions from insurers in respect of any insurance policies which relate to you
- p) Health and safety obligations
- q) Prevention and detection of fraud or other criminal offences
- r) To defend the School in respect of any investigation or court proceedings and to comply with any court or tribunal order for disclosure.

Some of the above grounds for processing will overlap and there may be several grounds which justify our use of your personal information.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

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 school 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 suppliers' 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

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

- Where we need to perform the contract we have entered into with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- When you have provided us with consent to process your personal data.

We need all the categories of information in the list above primarily to allow us to perform our contract with you, with your consent and to enable us to comply with legal obligations.

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 1 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 or tribunals
- The Home Office
- The DBS
- Other professionals we engage with (eg to advise us generally)
- Our signing in system
- Automated monitoring of our websites and other technical systems such as our computer networks and connections, CCTV and access control systems, remote access systems, email and instant messaging systems, intranet and internet facilities.

6. How we store this data

We keep personal information about you while you work with our school. We may also keep it beyond your work with our school if this is necessary. Our record retention schedule/records management policy sets out how long we keep information about suppliers. A copy of our record retention schedule/records management policy is available upon request by contacting information@beckmeadtrust.org

Except as otherwise permitted or required by applicable law or regulation, the School only retains personal data for as long as necessary to fulfil the purposes they collected it for, as required to satisfy any legal, accounting or reporting obligations, or as necessary to resolve disputes.

To determine the appropriate retention period for personal data, the School considers the amount, nature and sensitivity of personal data, the potential risk of harm from unauthorised use or disclosure of personal data, the purposes of processing the personal data, whether we can fulfil the purposes of processing by other means and any applicable legal requirements.

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. In addition we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know.

Third parties will only process your personal information on our instructions and where they have agreed to treat information confidentially and to keep it secure.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

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 authority which covers the local school area – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Department for Education (DfE)
- Our regulator, Ofsted
- Law enforcement officials such as police, HMRC]
- LADO
- Professional advisors such as lawyers, advisers and consultants - for us to develop our services and best provide our public service
- Support services (including HR support, insurance, IT support, information security, pensions and payroll);
- The DBS service
- Third party suppliers providing redaction services as part of a valid information request that complies with current legislation.

Information will be provided to those agencies securely or anonymised where possible.

The recipient of the information will be bound by confidentiality obligations, we require them to respect the security of your data and to treat it in accordance with the law.

7.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies. We may share your information internationally where (but not limited to):

- we or a company we work with store information on computer servers based overseas; or

- we communicate with you when you are overseas.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law and appropriate steps will be taken to keep the data secure. We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA. The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.

Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

In cases where we have to set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us.

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 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 or concerns, or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Dee Fullerton, dpo@beckmeadtrust.org

However, our **data protection leads** have day-to-day responsibility for data protection issues in our schools. The data protection lead in schools is the Head Teacher or related senior management member of staff for this purpose. For Central Services please contact the DPO.

If you have any questions or concerns, or would like more information about anything mentioned in this privacy notice, please contact them in the first instance.

11. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.