



# Privacy Notice Suppliers

**ENDEAVOUR MULTI ACADEMY TRUST**

<b>Implementation Date:</b>		Autumn Term 2022
<b>Last Review Date:</b>		-
<b>Next Review Date:</b>		Autumn Term 2023
<b>Committee:</b>		Policy Oversight Committee
<b>Review Cycle:</b>		1 YEAR
<b>Statutory Policy:</b>		Yes
<b>Date</b>	<b>Version</b>	<b>Reason for change</b>
23/11/2022	V1.0	New Policy Drafting

## Contents

<b>Privacy Notice</b> .....	1
<b>Suppliers</b> .....	1
<b>ENDEAVOUR MULTI ACADEMY TRUST</b> .....	1
1. Introduction.....	3
2. The personal data we hold .....	3
3. Why we use this data .....	4
4. Our lawful basis for using this data .....	4
5. Collecting this data.....	5
6. How we store this data .....	6

---

## 1. Introduction

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

Our Trust, Endeavour Multi Academy Trust, Wightwick Hall School, Tinacre Hill, Wolverhampton WV6 8DA 01902 761889, is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer is Tony Dooley (see 'Contact us' below).

## 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
- › 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
- › Information relating to visits to the school, 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 school site, our privacy notice for visitors to the school will also apply. A copy of this policy can be obtained through the Trust Office.

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 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

#### **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 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**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way
- We need to protect your vital interests (or someone else's interests)

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 go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information overlap, and there may be several grounds which justify the school's use of your data.

#### **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

Personal data is stored in line with our Data Protection Policy.

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and is only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with Staffordshire County Council's Record Retention Schedule. A copy of this document is available upon request from our Data Protection Officer. We will dispose of your personal data securely when we no longer need it.

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 Data Protection Law), we may share personal information about you with:

	We need to comply with a legal obligation	We need it to perform an official task in the public interest	We need to protect the individual's vital interests (or someone else's interests)
<i>Our Local Authority</i>	X		X
<i>The Department for Education</i>	X		
<i>Educators and Examining Bodies</i>	X	X	
<i>Our regulator e.g. Ofsted</i>	X		
<i>Suppliers and service providers</i>		X	
<i>Financial organisations</i>		X	
<i>Central and Local Government</i>		X	X
<i>Health Authorities</i>			X
<i>Health and Social Welfare organisations</i>	X		X
<i>Professional advisers and consultants</i>		X	
<i>Charities and Voluntary organisations</i>		X	

<i>Police forces, courts, tribunals</i>	X	X	
---	---	---	--

## 7.1 Transferring data internationally

We may share personal information about you with the following international third parties, where different data protection legislation applies.

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

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

### How to access personal information we hold about you

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

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 our Data Protection Officer.

### Your Other Rights Regarding Your Data

Under UK Data Protection Law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to 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, deleted or destroyed, or restrict processing
- Claim compensation for damages caused by a breach of the data protection regulations
- Withdraw your consent, where you previously provided it for the collection, processing and transfer of your personal data for a specific purpose

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.

To make a complaint, please contact 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**:

- Anthony Dooley Telephone: 01827 426123  
Email: [t.dooley@endeavourmat.co.uk](mailto:t.dooley@endeavourmat.co.uk)