



Suppliers, Contractors and Consultants Privacy Notice

To be reviewed every two years by the Trust Board

History of Document

Issue No	Author	Date Reviewed	Approved by Trust Board	Comments
1	DPO	3/11/18	-	1 st issue
2	DPO	23/11/20	17/12/20	Overview, international transfers, complaints
3	DPO	Sept 22	8/12/22	To include contractors
4	DPO	6 March 2023		New DPO and change of address of Data Controller

Overview

We are required by data protection law to give you the information in this Privacy Notice. It is important that you read the Privacy Notice carefully, together with any other similar or additional information that we might give you from time to time about how we collect and use your personal data. We may update this Privacy Notice at any time.

The Active Learning Trust (“the Trust”) is a multi academy trust with 21 academies. The Trust is a charitable company limited by guarantee (registration number 07903002) whose registered office is Cromwell Community College, Wenny Road, Chatteris, Cambridgeshire, PE16 6UU. The Trust is the Data Controller for all the academies within the Trust for the purposes of data protection law. This means that we are responsible for deciding how we hold and use personal data about you.

Our Data Protection Officer is The ICT Service - dpo@theictservice.org.uk. As Data Protection Officer, they are responsible for informing and advising us about our data protection law obligations and monitoring our compliance with these obligations. They also act as your first point of contact if you have any questions or concerns about data protection.

Categories of Personal Data we process

We process personal data relating to suppliers, contractors and consultants we engage, to provide goods and services at our schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details (e.g. phone number, address, email address) including emergency contacts
- Bank account details, payroll records, National Insurance number and tax status information
- Disclosure and Barring Checks - DBS certificate (when conducting “unsupervised” work)
- Identification information - ethnic group, language, date of birth
- Information about your entitlement to work in the UK
- Information about any criminal record
- References from former employers or service users
- Sickness and relevant medical and health information including whether or not you have a disability for which the organisation needs to make reasonable adjustments and fulfil its duty of care (including the use of Occupational Health Services)
- Terms and conditions of your deployment including contractual terms
- Details of your schedule (days of work and working hours) and attendance at work
- Periods of leave take by you, including holidays, sickness absence, family leave and sabbaticals and the reasons for the leave
- Details of qualifications, skills, experience and employment history where required, including start and end dates with previous employers and with the Trust
- Details of any discrepancy or grievance procedures in which you have been involved, including any warning issued to you and related correspondence
- Assessment of your performance, including appraisals, performance reviews and ratings

- Training you have participated in, performance improvement plans and related correspondence
- Photographs for internal identification, safeguarding and security reasons
- CCTV images
- Times and dates of visits, car registration

Why we use Personal Data

The purpose of processing this data is to help us run the Trust and its constituent schools including to:

- Facilitate our safer recruitment procedures as part of our safeguarding obligations towards pupils
- Enable you to be paid
- Facilitate communications between us and yourselves around contractual matters
- Identification reasons
- Enable you to work safely in the Trust's schools
- For security purposes, including CCTV in accordance with the Trust's CCTV policy
- Support effective performance management and appraisals
- Support effective management of a school's workforce, along with the implantation of its policies and procedures
- Develop all aspects of the school operationally
- Allow better financial modelling, administration, and planning
- Provide references where requested
- Equalities monitoring and reporting
- Respond to any staffing issues
- Improve the management of workforce data across the sector

Collecting and using Personal Data in this way is lawful because:

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 e.g. Keeping Children Safe in Education
- Carry out a task in the public interest

How we collect Personal Data

Some information we hold is data that has either been provided to us by you, your employer or data which we have gathered during your visit to a school.

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us. 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.

How we store Personal Data

Your information is kept secure and is only used for purposes directly relevant to the goods or services you offer. Your information be held in accordance with the Trust's Records Retention Policy.

Data Sharing

We will not share information about you with third parties without your consent unless the law allows us to. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- Financial organisations - in order to meet our contractual obligations in facilitating banking and financial services
- Our auditors - to meet our legal obligations to share data in order to ensure compliance to relevant legislation
- Our finance system provider – to meet our legal obligations to record our financial activity
- Our local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- The Department for Education – to meet our legal obligations to share certain information with it
- Central and local government – such as workforce analysis
- Your family and representatives – such as in the event of an emergency
- Ofsted – such as during the course of a school inspection
- Your agency or employer regarding the service provided
- Suppliers and service providers – to enable them to provide the service we have contracted them
- Security organisations – to create a secure school environment
- Professional advisers and consultants – for us to develop our service to best provide our public service
- Police forces, courts, tribunals
- Future employers – references

Otherwise, personal data collected by our schools will remain within a school and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know basis'). Typically, this would be the Central Health & Safety Team, the school HR /Business Manager personnel and Accounts staff and, for names and photo ID, members of a school's staff responsible for safeguarding in a school.

Contractors are reminded that a school is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education) to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This may include file notes on personnel or safeguarding files, and in some cases referrals to relevant authorities such as the LADO or police. For further information about this, please view the Trust's Safeguarding Policy.

Finally, in accordance with Data Protection Law, some of a school's processing activity is carried out on its behalf by third parties, such as IT systems, web developers or cloud storage providers. This is always subject to contractual assurances that personal data will be kept securely and only in accordance with a school's specific directions.

Transferring data internationally

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law. We currently transfer personal data outside the EEA as we store personal data on cloud systems based in the EEA that have backup systems that may sometimes be located outside the EEA.

Your rights

You have the right to:

- Ask for access to your personal information
- Ask for rectification of the information we hold about you
- Ask for the erasure of information about you
- Ask for our processing of your personal information to be restricted
- Object to us processing your information.

If you want to use your rights, for example, by requesting a copy of the information which we hold about you, please contact the Trust's Data Protection Officer are as follows:

Email: dpo@theictservice.org.uk

More information about your rights is available in our Data Protection Policy which is on our website <https://www.activelearningtrust.org/about/information-governance>

Complaints/Concerns

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/complaint about our data processing, please raise this with our Data Protection Officer 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/concerns/>
- Call 0303 123 1113 (local rate)
- Call 01625 545 745 (national rate)
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Contact

If you would like to discuss anything in this privacy notice, please contact the Trust's Data Protection Officer - dpo@theictservice.org.uk