

Three Counties Academy Trust



Privacy Statement – Third-Party Suppliers and Contractors Data – FI12(J)

Three Counties Academy Trust (TCAT)

Effective Date: Academic year 2026-2027

Last Reviewed: October 2nd, 2026

1. Introduction

Three Counties Academy Trust, commonly referred to as **TCAT**, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **third-party suppliers and contractors data** across all TCAT schools in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data held in relation to third-party suppliers and contractors unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

2. What Data We Collect

We collect, store, and process the following categories of third-party suppliers and contractors data:

- **Personal Information** – Name, title, and role within the organisation
- **Contact Information** – Business address, email address, and phone numbers
- **Financial Information** – Bank details for payment processing, invoices, and remittance records
- **Contractual Information** – Agreements, purchase orders, and service level agreements (SLAs)
- **Employment and Background Information** – Where applicable, qualifications, references, and right-to-work documentation
- **Insurance and Compliance Information** – Proof of professional indemnity, employer's liability, and safeguarding certifications
- **Disclosure and Barring Service (DBS) Checks** – For contractors and service providers working directly with children
- **CCTV Footage** – If suppliers and contractors visit TCAT schools where CCTV is in operation
- **Health and Safety Information** – Records of site inductions, risk assessments, and accident reports (where applicable)

3. Why We Collect and Use Third-Party Supplier and Contractor Data

We process third-party suppliers and contractors data under the following lawful bases as defined under UK GDPR:

- **Legal Obligation (Article 6(1)(c))** – To comply with financial, safeguarding, and procurement regulations
- **Public Task (Article 6(1)(e))** – To ensure the safe and effective operation of TCAT schools
- **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for contract management, invoicing, and compliance monitoring, balanced against individual rights
- **Contractual Obligation (Article 6(1)(b))** – To fulfil agreements between TCAT and its suppliers or contractors

Additionally, if we process **special category data** (e.g., DBS checks, health and safety records), we rely on **Article 9(2)(b) and (g) UK GDPR**, as processing is necessary for safeguarding, employment, and legal compliance.

4. How We Use Third-Party Supplier and Contractor Data

We use third-party suppliers and contractors data for the following purposes:

- To establish and manage contracts for goods and services
- To process payments, invoices, and financial transactions
- To verify identity, qualifications, and compliance with safeguarding policies
- To ensure adherence to health and safety requirements
- To maintain records of supplier and contractor performance
- To manage access control and security when visiting TCAT schools
- To respond to regulatory and audit requests from government bodies

5. How We Store and Protect Third-Party Suppliers and Contractors Data

We take the security of third-party suppliers and contractors data seriously and use the following measures to protect it:

- **Physical Security** – Secure storage of contract documents in locked areas
- **Technical Security** – Encrypted databases, password-protected systems, and secure cloud storage
- **Organisational Measures** – Staff training, clear procurement policies, and regular audits to ensure compliance

We only retain third-party suppliers and contractors data for as long as necessary in line with our **Records Management Policy**, which follows guidance from the **Information and Records Management Society (IRMS) Schools Toolkit**.

- Contract and financial records will be retained for **seven years** in accordance with financial regulations
- Safeguarding and health and safety records will be retained for **as long as legally required**

6. Who We Share Third-Party Suppliers and Contractors Data With

We only share third-party suppliers and contractors data when necessary and lawful, including with:

- **Regulatory and Government Bodies** – Such as the **Department for Education (DfE)**, **Education and Skills Funding Agency (ESFA)**, and **local authorities**
- **Law Enforcement Agencies** – If required for legal compliance or safeguarding concerns
- **Insurance and Legal Advisors** – For claims processing and contract disputes
- **Auditors and Financial Regulators** – For statutory and compliance audits
- **IT and System Providers** – Where suppliers use TCAT systems for invoicing or contract

All third parties we share data with must comply with strict data protection agreements.

7. International Data Transfers

Some analytics and tracking tools may process data outside the UK. If this occurs, we ensure adequate safeguards, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

8. Third-Party Suppliers and Contractors Rights

Under UK GDPR, third-party suppliers and contractors have the following rights regarding their personal data:

- **Right to Be Informed** – About how we use their data
- **Right of Access** – To request a copy of their personal data
- **Right to Rectification** – To correct inaccurate or incomplete data
- **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
- **Right to Restrict Processing** – To limit how data is used
- **Right to Data Portability** – To request data in a transferable format (where applicable)
- **Right to Object** – To processing based on legitimate interests
- **Rights Related to Automated Decision-Making** – We do not use third-party suppliers and contractors data for automated decisions

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

9. Contact Details

For any questions about this privacy statement or to exercise your rights, please contact:

N Cook Data Protection Officer

on behalf of Three Counties Academy Trust

Schools DPO, c/o PSB jubilee House, Townsend Lane, London, NW9 8TZ

Email: nicola@schoolsdpdpo.com

Tel: 01296 658502

If you have concerns about how your data is handled, you can also contact the **Information Commissioner's Office (ICO)**:

ICO Website: www.ico.org.uk

ICO Helpline: 0303 123 1113

10. Changes to This Privacy Statement

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.