

Appendix 8 : Privacy Notice (Suppliers)

Privacy notice for suppliers used by the school

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

This privacy notice explains how the School collect, store and use personal data about suppliers of goods and services that the school contracts with, including their individual representatives, employees and agents ("you", "your"), in line with the General Data Protection Regulation (GDPR) and Data Protection Act 2018.

The School, Audenshaw School, Hazel Street, Manchester M34 5NB are the 'data controller' for the purposes of data protection law.

The data protection officer is Mrs S Monks (see 'Contact us' below).

The personal data the School hold

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

- Names, characteristics and contact details of representatives and other individuals employed by the supplier or working on their behalf who the School liaise with, and who are carrying out duties under the contract with the School
- 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 operating as a sole trader
- Any other personal information necessary to fulfil the terms of a contract the School have with the supplier

If the contract with the supplier requires a visit, representatives, employees or agents to visit or carry out any work at the school site, the School may also collect, use and store:

- Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes
- CCTV images captured in school
- Information about any access arrangements that may be required

In this case, the privacy notice for visitors to the School will also apply.

The School use this data to:

- Decide whether to engage with the supplier
- Fulfil the terms of the contract with the supplier, including payment
- Keep accurate records of the suppliers that the School use
- Identify suppliers, their representatives, employees and agents while on the school site, and keep all individuals safe
- Keep students and staff safe while the supplier or their representatives, employees or agents are on the school site
- Keep accurate records of visits to the school

The lawful basis for using this data

The School only collect and use personal information when the law allows us to. Most commonly, the School use it where the need to:

- Comply with a legal obligation
- Carry out a task in the public interest

Less commonly, the School may also use personal information about where:

- Consent has been given to be used it in a certain way
- The School need to protect vital interests (or someone else's interests)

Where consent has been given for data to be used, this can be withdrawn at any time. The School will make this clear when requesting consent and explain how consent can be withdrawn if required

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

Collecting this information

While the majority of the information the School collect is mandatory, there is some information that can be chosen whether or not to be provided.

Whenever the School seek to collect information, it will make it clear whether this must be provided (and if so, what the possible consequences are of not complying), or if there is a choice.

How the School store this data

Where personal information is relevant to the contract, the School keep it according to the record retention schedule and the statutory obligations.

The School also keep personal information about suppliers, representatives, employees and agents whenever they visit the school. The School may keep it beyond the visit if this is necessary in order to comply with the legal obligations.

The record retention schedule sets out how long the School keep this information and is based on the guidance provided within the [Information and Records Management Society's toolkit for schools](#).

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

The School will dispose of personal data securely when the School no longer need it.

Data sharing

The School do not share information about suppliers or their representatives, employees or agents without consent unless the law and the policies allow them to do so.

Where it is legally required, or necessary (and it complies with data protection law), the School may share **personal information with:**

- The local authority – to meet our legal obligations to share certain information with it, such as where supplier information is relevant to a safeguarding concern
- The Department for Education
- Educators and examining bodies
- The regulator i.e. Ofsted
- Other suppliers and service providers. We will ensure all providers are GDPR compliant
- Central and local government
- The auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes
- Survey and research organisations

- Health authorities
- Security organisations
- Health and social welfare organisations
- Professional advisers and consultants
- Charities and voluntary organisations
- Police forces, courts, tribunals
- Professional bodies

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

Your rights

How to access the personal information the School hold about individuals

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

If a subject access request is made, and if the School do hold information, the School will:

- Give a description of it
- Explain why the School are holding and processing it, and how long the School will keep it for
- Explain where the School got it from, if not from the individual
- Explain who it has been, or will be, shared with
- Explain whether any automated decision-making is being applied to the data, and any consequences of this
- Supply a copy of the information in an intelligible form

There is also a right for an individual's personal information to be transmitted electronically to another organisation in certain circumstances.

If a request is to be made please contact the data protection officer.

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. Individuals have the right to:

- Object to the use of personal data if it would cause, or is causing, damage or distress
- Prevent the data being used to send direct marketing
- Object to the use of personal data for decisions being taken by automated means (by a computer or machine, rather than 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

To exercise any of these rights, please contact the data protection officer.

Complaints

The School take any complaints about the collection and use of personal information very seriously.

If you think that the collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about the data processing, please raise this with the School in the first instance.

To make a complaint, please contact the 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 the data protection officer:

- Mrs S Monks
- 0161 336 2133
- monkss@audenshawschool.org.uk