



## Abbey Multi Academy Trust **Policies & Procedures**

### Privacy notice for suppliers of goods or services

2025/26 Academic Year

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# Privacy notice for suppliers of goods and services

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**Policy Owner:** Data Protection Officer

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## 1. Policy Statement

Under UK data protection law, individuals have a right to be informed about how our schools, and the multi-academy trust (MAT) we are part of, 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 good and services that the trust, either directly or through one of our schools, contracts with, including their individual representatives, employees and agents.** References to "you" in this privacy notice cover all of those individuals.

Our trust, Abbey Multi Academy Trust is the '**data controller**' for the purposes of UK data protection law.

## 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 fulfill the terms of a contract we have with you
- Information relating to visits to school or trust sites, e.g. the individual's company or organisation name, arrival and departure time, vehicle number plate
- Information about your use of our information and communication systems, equipment and facilities (e.g. school computers)

If our contract with you requires you to visit or carry out any work at our school sites/premises, our privacy notice for visitors to the school will also apply. A copy is available on our website or on request from our data protection officer (please see '*Contact Us*' below).

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 or at another trust site

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

### **3. Why we use this data**

We collect and use the data listed above to:

- Decide whether to engage you
- Fulfil the terms of our contract with you, including payment
- Keep accurate records of the suppliers that we use
- Identify you while on the school site or trust site, and keep all individuals safe
- Keep pupils and staff safe while you are on the school site
- Maintain accurate records of visits to the school site or trust site
- Provide appropriate access arrangements
- Meet legal requirements placed upon us
- Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

If you fail to provide certain information when requested, we may not be able to perform the contact we have entered into with you, or we may be prevented from complying with our legal obligations.

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

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

#### **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 this consent or 'opt out' of receiving these emails and/or texts at any time by selecting 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 information through automated decision-making or profiling. If this changes in the future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

### 3.3 Use of your personal data for filtering and monitoring purposes

While you are in any of our trust's schools, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

## 4. Our lawful basis for using this data

We will only collect and use your information when the law allows us to. We need to establish a '**lawful basis**' to do this.

Our primary lawful bases for processing your personal information for the reasons listed in section 3 above are:

- In accordance with the '**contract**' basis: We need to process your personal information to enter into and manage contracts for goods and services that support the running of our schools and the trust. This includes maintaining contact with you or your organisation, arranging payments, and managing the delivery of contracted services.
- In accordance with the '**public task**' basis: we need to process your data to fulfil our official duties as an academy trust, such as ensuring that our schools operate effectively and safely, and that pupils receive high-quality education and support. This is set out in legislation including:
  - Education Act 2002 – sets out the duties of schools and governing bodies to provide education and safeguard pupils.
  - Children Act 2004 – places duties on schools and other agencies to cooperate to safeguard children

These laws require us to operate safely, manage school resources responsibly, and act in the public interest.

- In accordance with the '**legal obligation**' basis: we need to process your data to meet our responsibilities under law, such as safeguarding and financial reporting, as set out in legislation including:
  - Health and Safety at Work etc. Act 1974 – for maintaining a safe environment for students, staff and visitors
  - Children Act 1989 and 2004 – for safeguarding and information sharing to protect children

- Public Contracts Regulations 2015 – for transparency and accountability in procurement and tendering processes
- Equality Act 2010 – for duties relating to equality and non-discrimination

These laws require us to protect the health, safety and wellbeing of everyone on our premises, to manage our procurement and financial responsibilities properly, and to share information with relevant authorities when necessary.

Less often, we may also use your personal information:

- In accordance with the **‘recognised legitimate interests’** basis: We may need to use your personal information for important reasons that are already permitted by law, such as sharing information with another public organisation (for example, a local authority or the police) if required for their official duties, responding to an emergency, preventing or reporting a crime, or protecting a child or others from harm.

We will only do this when it is necessary and there is no better or safer way to achieve the same purpose

- In accordance with the **‘vital interests’** basis: We may use personal information in a life-or-death situation, for example to protect your physical health or that of another person.
- In accordance with the **‘consent’ basis**: We will seek consent from you before using your personal information for optional purposes such as marketing, publicity materials, testimonials, or promotional photographs and videos.
- In accordance with the **‘legitimate interests’ basis**: We may use personal information where the impact on privacy is minimal and there is a sound reason to do so, such as improving visitor management processes, site security, or communication with visitors.

We will only rely on this basis when the processing is necessary and does not override your rights or freedoms.

Where we rely on consent to use personal information, you may withdraw that consent at any time. We will always make it clear when we are asking for consent and explain how you can withdraw it if you choose to.

#### 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 information**

We will only collect and use your data when the law allows us to (as detailed above in section 4 of this notice).

While the majority of the 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

## **6. How we store this data**

We keep personal information about you while you work with our trust or one or more of our schools. We may also keep it beyond your work with us if this is necessary to comply with our legal obligations or to meet our regulatory requirements. Our record retention schedule and our records management policy set out how long we keep information about suppliers and how we store it.

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

We will dispose of your personal data securely when we no longer have a legal requirement to retain it.

The latest versions of our records management policy and our record retention schedule are available on our website. You can also get a copy by contacting our data protection officer.

## **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 authorities (Leeds City Council and Calderdale MBC, depending on the location of your work) – to meet our legal obligations to share certain information with them, such as safeguarding concerns
- Government departments or agencies
- Department for Education
- Our regulator, Ofsted
- Suppliers and providers of services such as:
  - Catering
  - Communication tools
  - Filtering and monitoring
- Financial organisations
- Our auditors
- Survey and research organisations
- Health authorities



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

## 7.1 Transferring data internationally

We may share personal information about you with some third-party organisations that are based outside the UK, for example, cloud service providers or other platforms that store data on servers located in other countries.

Where we transfer personal data to a country or territory outside the UK, we will always do so in accordance with UK data protection law.

This means we will only transfer data:

- To countries covered by a UK adequacy regulation, where the government has decided that the country's data protection laws provide an appropriate level of protection; or
- Using appropriate safeguards, such as approved standard contractual clauses or binding agreements, to make sure your information remains protected.

If you would like more information about any international transfers of your personal data, or to see a copy of the safeguards where these are in place, please contact our Data Protection Officer.

## 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 apply):

- Give you a description of it
- Tell you why we are holding it, how we are 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 with 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 UK 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
- Object to the processing of personal data that is likely to cause, or is causing, damage or distress
- 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 or blocked
- 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 (ICO)
- Claim compensation for damages caused by a breach of the data protection regulations

We may refuse your information rights request for legitimate reasons, which depend on why we're processing it. Some rights may not apply in these circumstances:

- Your right to have all personal data deleted or destroyed doesn't apply when the lawful basis for processing is legal obligation or public task
- Your right to receive a copy of your personal data, or have your personal data transmitted to another controller, does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests
- Right to object to use of your private data doesn't apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent

See information on types of lawful basis in section 4 of this privacy notice.

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 concerns about our data processing, please raise this with us in the first instance. You can make a complaint to us at any time by contacting [dpo@abbeytrust.org](mailto:dpo@abbeytrust.org). We will acknowledge complaints within 30 days and respond without undue delay.

If you're not satisfied with the way we have handled your personal information, you have the right to complain 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 (DPO)**:

- Data Protection Officer: Kerry Weatherill
- Email [dpo@abbeytrust.org](mailto:dpo@abbeytrust.org)
- Call 0113 320 1438
- Or write to: Data Protection Officer, Abbey Multi Academy Trust, The Moyes Centre, Bishops Way, Seacroft, Leeds, LS14 6NU