

Privacy notice for suppliers of goods and services

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

We, Anthem Schools Trust, are the 'data controller' for the purposes of UK data protection law.

Our Trust Data Protection Officer is Claire Pannell. We also have school data protection leads (see 'Contact us' below).

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
- 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 the school site, our privacy notice for visitors to the school will also apply, available on the Trust website.

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.

Why we use this data

We 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, and keep all individuals safe
- Provide education to our students
- Keep students and staff safe while you are on the school site
- Keep accurate records of visits to the school
- 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 contract 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 another reason and that reason is compatible 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 which 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.

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).

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.

Use of your personal data for filtering and monitoring purposes

While you are in our school or Trust, 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 and Safeguarding Policy, Acceptable Use agreement) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed above will be one or more of the following:

- Public task
- Legal obligation
- Consent
- Vital interests
- To fulfil a contract
- Legitimate 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 would go about withdrawing consent if you wish to do so.

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.

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

How we store this data

We keep personal information about you while you work with our school. We may also keep it beyond your work with our school if this is necessary to comply with our legal requirements or to meet our regulatory requirements. Our Retaining Records Policy, available on request, sets out how long we keep information about suppliers.

We have put in place appropriate security measures to prevent your personal information 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 need it.

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:

- The local authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and information about exclusions
- Government departments or agencies
- Department for Education
- Our youth support services provider
- Our regulator, Ofsted
- Suppliers and service providers including but not limited to catering suppliers, school trip providers, third party education resources, apps and providers
- 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, tribunals

Transferring data internationally

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

- Other schools or educational establishments
- Government departments or agencies
- Security organisations
- App or cloud server providers

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.

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.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

For further information on making a subject access request please refer to the Data Protection Policy. If you would like to make a request, please contact us (see 'Contact us' below).

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 where it 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 if you feel we have not used your information in the right way
- 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.

To exercise any of these rights, please contact us (see 'Contact us' below).

Complaints

We take complaints about how we collect and use 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.

You can make a complaint to us at any time by contacting our Deputy Data Protection Officer at complaints@anthemtrust.uk. Upon receiving a complaint, we will:

- Acknowledge receipt of the complaint within 30 days of receiving it
- Without undue delay, take appropriate steps to respond to the complaint, including:
 - Making appropriate enquiries based on the circumstances of the complaint
 - Keeping the complainant informed on the progress of the investigation
- Without undue delay, inform the complainant of the outcome of the investigation.

You can also make a complaint 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.

Recording of telephone calls

All telephone calls with Anthem schools may be recorded for training, quality assurance, and establishment of facts purposes. We have notices on our websites, in our Data Protection Policy and in all our privacy notices to set this out. We also have included information about this on the automatic voice message for each school and the Trust. Personal data obtained on calls is collected, stored, and processed in accordance with data protection legislation as set out in our Data Protection policy.

Contact us

If you have any questions, concerns, or would like more information about anything mentioned in this privacy notice, please contact the **school data protection lead** (see Appendix 2 of our Data Protection Policy) or our **Trust Data Protection Officer**: Claire Pannell at cpannell@anthemtrust.uk, 0333 996 3030.

Our **data protection leads** have day-to-day responsibility for data protection issues in our schools.