



**MOWBRAY**  
Education Trust

# Privacy notice for suppliers used by the school

**April 2021**

Under UK data protection law, individuals have a right to be informed about how the Trust uses any personal data we hold about them. We comply with this right by providing 'privacy 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 school contracts with, including their individual representatives, employees and agents ("you", "your"), in line with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

We, Mowbray Education Trust (Trust), c/o John Ferneley College, Scalford Road, Melton Mowbray, Leicestershire, LE13 1LH, are the 'data controller' for the purposes of UK data protection law. This means that we are responsible for deciding how we hold and use personal information about you. This policy covers all our educational establishments:

- Ab Kettleby Primary School
- Brownlow Primary School
- The Grove Primary School
- John Ferneley College
- Oasis Family Centre
- Sherard Primary School
- Somerby Primary School

Where this policy states 'school' this means any of our educational establishments and the wider Trust.

Our data protection officer is **SPS DPO Services** (see 'Contact us' at the end of this privacy notice).

## **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 of representatives and other individuals employed by you or working on your behalf who we liaise with, and who are carrying out duties under your contract with us
- 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 about business and pecuniary interests
- Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate

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. To access our Visitors Privacy Notice please [click here](#).

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 this data 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 and your representatives, employees and agents while on the school site, and keep all individuals safe
- Keep pupils and staff safe while you or your representatives, employees or agents are on the school site
- Keep accurate records of visits to the school

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.

## Our lawful basis for using this data

We only collect and use your personal data when the law allows us to. Most commonly, we use it where we need to:

- Fulfil a **contract** we have entered into with you or to help you enter into a contract with us
- Comply with a **legal obligation** - we need to process data to meet our responsibilities under law and to keep our pupils and staff safe while on the school premises

Less commonly, we may also use this personal information where:

- Carry out a task in the **public interest** – we need process data to fulfil our statutory function as a school
- You have given us **consent** to use your personal data in a certain way
- We need to protect your **vital interests** (or someone else’s interests) - we will use this personal data in a life-or-death situation
- We have **legitimate interests** in processing the data - where there is a minimal privacy impact and we have a compelling reason

Where we have obtained consent, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how to withdraw it.

Some of the reasons listed above for collecting and using your personal information overlap, and there may be several grounds which justify the school’s use of this data.

## 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 information**

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**

Where personal information is relevant to our contract with you, we keep it according to our Data Retention Policy and our statutory obligations.

We also keep personal information about you, your representatives, employees and agents whenever you/they visit our school. We may keep it beyond the visit if this is necessary in order to comply with our legal obligations.

Our Data Retention Policy sets out how long we keep this information, details of which can be requested by e-mailing [dataprotection@mowbrayeducation.org](mailto:dataprotection@mowbrayeducation.org).

We will dispose of your personal data securely when we no longer need it.

## **Data sharing**

We do not share information about suppliers or their representatives, employees, agents or 3<sup>rd</sup> parties 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 your personal information with:

- Our local authority – to meet our legal obligations to share certain information with it, such as where supplier information is relevant to a safeguarding concern
- Government departments or agencies
- Educators and examining bodies
- Our regulator Ofsted
- Other suppliers and service providers
- Our auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes

- Health authorities
- Security organisations
- Health and social welfare organisations
- Charities and voluntary organisations
- Professional advisers and consultants
- Police forces, courts, tribunals
- Charities and voluntary organisations
- The organisation/company you are representing
- Professional bodies

## **Transferring data internationally**

Where we transfer 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.

## **Use of your personal information for marketing purposes**

Where you have given us consent to do so, the school may send you marketing information by e-mail or text promoting school events, campaigns, charitable causes or services that may be of interest to you. You can "opt out" of receiving these texts and/or e-mails at any time by clicking on the "Unsubscribe" link at the bottom of any such communication, or by contacting our Group Data Protection Lead (see 'Contact us' below) .

## **Your rights**

### **How to access the personal information we hold about you**

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

If you make a subject access request, and if we do hold information about you, we will:

- Give you a description of it
- Tell you why we are holding and 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 a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Group Data Protection Lead (see 'Contact us'

below).

## Your other rights regarding your data

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

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your 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
- 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
- Claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Group Data Protection Lead (see 'Contact us' below).

## 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 concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact our Data Protection Officer.

Alternatively, you can 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

## Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **Data Protection Officer**:

### SPS DPO Services

Email: [sps-dpo-services@isystemsintegration.com](mailto:sps-dpo-services@isystemsintegration.com)

Correspondence address:

**SPS SPO Services**

I Systems Integration  
Devonshire House  
29-31 Elmfield Road  
Bromley  
Kent  
BR1 1LT  
Tel: 0208 050 1387

However, our **Group Data Protection Lead** has day-to-day responsibility for data protection issues in our schools.

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact them:

**Group Data Protection Lead**, Mowbray Education Trust, c/o John Fernley College, Scalford Road, Melton Mowbray, LE13 1LH, Tel: 01664 565901 or email [dataprotection@mowbrayeducation.org](mailto:dataprotection@mowbrayeducation.org) .

*This notice will be reviewed next by Mowbray Education Trust in Summer Term 2022.*

**Log of Changes to Document**

Version	Date	Page	Change	Approver:
V1.0	Oct-19	All pages	New Privacy Notice for MET Audit Committee approval	Group Data Protection Lead
V1.0	31/10/19	All pages	Approved	MET Trust Board
V1.0	Aug-20	All pages	Annual review with the following changes made: <b>Page 1</b> - Date of Policy updated <b>Page 2</b> – The Personal data we hold section - reworded and removed duplication <b>Page 2</b> – ‘Why we use this data’ section - added automated decision-making paragraph. <b>Page 3</b> – Our lawful basis for using this data section – updated & highlighted basis for each line <b>Page 3</b> – Addition of new section ‘Our basis for using special category data’ <b>Page 4</b> – Collecting this info – reworded and added in data may be held from other sources – i.e. LA/Gov/Police <b>Page 4</b> – Changed e-mail address in How we store this data to Data Protection e-mail <b>Page 5</b> – Charities & Voluntary organisations & The organisation/company you are representing added to data sharing section <b>Page 5</b> – Marketing use section added <b>Page 5</b> - Your rights section updated on Contact details	Group Data Protection Lead

			<p><b>Page 6</b> – Updated 2 new other rights – notified of breach and complaint to ICO</p> <p><b>Page 6</b> - Your other rights section updated on Contact details</p> <p><b>Page 6</b> – Updated ICO ‘Make a Complaint’ link</p> <p><b>Page 7</b> – DPO Tel. contact number added</p> <p><b>Page 7</b> – Addition of Group Data Protection Lead to contact us section</p> <p><b>Page 7</b> - Next review date for MET Trust Board approval updated</p>	
V1.0	Sep-20	All pages	For re-approval	MET Trust Board
V1.0	Nov-20	All pages	Re-approved – Policy date updated to November on 1 <sup>st</sup> Page and footnotes	MET Trust Board
V1.0	Apr-21	1,3,4,5,6 5 6	Updated wording ‘UK Data Protection Law’ following Brexit Changed wording around transferring personal data outside the EEA Added point on withdrawing consent	AFR (Jun-21)
V1.0	Oct-21	All	Annual Review – No changes made	Data Protection Lead