



Privacy Notice for Suppliers of Goods and Services to Moordown St John's CE Primary School

Under data protection law, individuals have a right to be informed about how the school 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 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.

We, Moordown St John's CE Primary School, are the 'data controller' for the purposes of data protection law. Our Data Protection Officer is Kim Bainton (Contact details shown below in Section 9, How to Contact us).

1.0 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

If our contract with you requires you or your representatives, employees or agents to visit or carry out any work at the school site, we may also collect, use and store:

- Information relating to the visit, e.g. the individual's company or organisation name, contact details, arrival and departure time
- Photographs for identification purposes
- CCTV images captured in school
- Information about any access arrangements that may be required
- Confirmation of Enhanced DBS clearance (where required)

In this case, our privacy notice for visitors to the school will also apply. This can be found on the Data Protection/GDPR section of our school website.

2.0 Why we use this data

The purpose of collecting data is to support the school 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
- Ensure that appropriate access arrangements can be provided for those who require them
- Comply with our legal and statutory duties.

3.0 The lawful basis on which we use this information

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

- Fulfil a contract we have entered into with you
- Comply with a legal obligation

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

- We need it to perform an official task in the public interest
- We have obtained consent to use it in a certain way
- We need to protect an individual's vital interests (save someone's life)

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.

4.0 Collecting this information

Some of the information we collect from you is mandatory, and in some cases it is optional.

Whenever we seek to collect personal information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

We will only collect the data that we need in order to fulfil our purposes, which are set out above.

5.0 How we store this data

Where personal information is relevant to our contract with you, we keep it in accordance with our Records Retention Schedule/Records Management 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 Records Retention Schedule/Records Management policy sets out how long we keep this information.

A copy of this records retention/management policy is available from the School Office or may be downloaded from the Data Protection/GDPR section of our website

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 securely dispose of/delete your personal data when we no longer need it.

6.0 Data sharing

We do not share information about suppliers or their representatives, employees or agents without consent unless the law and our policies allow us to do so.

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

- *The Academy Trust – such as for the monitoring of contracts and ensuring best value*
- *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*
- *Other government organisations – such as HMRC to establish employment status for the settling of invoices direct rather than through payroll*
- *Our auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes*
- *The Information Commissioner's Office – to demonstrate that we have conducted appropriate due diligence regarding Data Protection and compliance with GDPR*
- *Survey and research organisations – such as for statistical analysis/school improvement*
- *Security organisations – such as to ensure the security of the premises/staff/pupils*
- *Health and social welfare organisations – such as to provide support/advice*
- *Professional advisers, bodies and consultants – such as to provide support/advice*
- *Police forces, courts, tribunals – such as for the prevention/detection of crime or fraud; or if there is an issue with a supplier that puts the safety of other pupils or staff at risk*
- *NHS Track and Trace Covid 19 – to report on those in close contact with anyone who has tested positive for Covid-19 within the setting.*

As part of the statutory school inspection process, we are required to share information with our regulators, OfSTED and SIAMS (Statutory Inspection of Anglican and Methodist Schools). Where possible such data is anonymised before sharing.

Occasionally we may share information with the Health and Safety Executive as part of our legal obligation to report certain accidents/incidents/near misses under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations).

Data sharing with NHS Track and Trace – Covid-19

The law on protecting personally identifiable information, known as the General Data Protection Regulation (GDPR), allows Public Health England to use the personal information collected by NHS Test and Trace Service.

Therefore if required to do so by the NHS Track and Trace Services, Moordown St John's Primary School will provide the contact details of all children and adults that have been in close contact with anyone that has tested positive for Covid-19 within the setting.

This is in accordance with Article 6(1)(e) of the GDPR '*processing is necessary for the performance of a task carried out in the public interest*'.

For more information please see the following government guidance.

<https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works#how-nhs-test-and-trace-service-works>

<https://contact-tracing.phe.gov.uk/help/privacy-notice>

6.1 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.

7.0 Your rights - requesting access to personal data (Subject Access Request)

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 the 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 Data Protection Officer.

7.1 Your other rights regarding your data

Under 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 by 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 our data protection officer.

8.0 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 our Data Protection Lead in the first instance; contact details are shown in Point 9 below.

To make a complaint, please contact our Data Protection Officer, contact details are shown in Point 9 below.

Alternatively, you can make a complaint direct to the Information Commissioner, see Point 10.

9.0 How to contact us for further information

If you would like further information or have a concern or complaint about how we are using your information, we would ask you to contact us:

Our school-based Data Protection lead is Nicky Armstrong (Admin & Personnel Manager)
Telephone: 01202 527683 ext 202 Email n.armstrong@st-johns.bournemouth.sch.uk
Nicky Armstrong, Moordown St John's CE Primary School, Vicarage Road, Bournemouth BH9 2SA

Our independent Data Protection Officer is Kim Bainton (School Business Manager, Kingsleigh Primary School) Telephone: 01202 528893 Email kim.bainton@kingsleighprimary.co.uk
Kim Bainton, Kingsleigh Primary School, Hadow Road, Bournemouth BH10 5HT

10.0 Information Commissioner

For further information about Information Rights legislation or to make a complaint, please contact the Information Commissioner's Office at www.ico.org.uk or telephone **0303 123 1113** or write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Concerns can also be reported online at <https://ico.org.uk/concerns/>

This notice is based on the [Department for Education's model privacy notices](#), amended for suppliers and to reflect the way we use data in this school.