

## Privacy Notice – Brigshaw Learning Partnership suppliers

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. References to "you" in this privacy notice cover all of these individuals.

The trust, The Brigshaw Learning Partnership is the 'data controller' for the purposes of data protection law.

## The personal data we hold

We process data relating to those we engage to provide services for our school. The categories of personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Personal information (such as name, ID number and characteristics)
- Contact details (email and name and address)
- Car registration
- Bank account details and other financial information where it relates to an individual, such as if you're operating as a sole trader
- Qualifications (where relevant), including work history, job titles,
- Work related qualifications
- Data about your use of the school's information and communications system
- References provided to other organisations
- Financial information
- DBS information

Under Article 9 of the GDPR, we may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, sexual orientation and political opinions
- Photographs for identification purposes
- Health, including any medical/disabilities information to help with access requirements. This includes physical and mental health and details of self isolation in a pandemic.
- CCTV footage captured in school

## Why we use this data

The purpose of processing this data is to help us run the school, including 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
- Keep pupils and staff safe while you are on the school site
- Keep accurate records of visits to the school
- Keep records required for public health
- Ensure we are providing a safe working environment with appropriately qualified staff
- Manage our extra-curricular activities safely
- To manage and protect public monies effectively
- To comply with the law regarding education
- To manage our data breach procedures
- Protect public health

## Our lawful basis for using this data

We collect and use supplier information for a number of different reasons:

- Article 6 and Article 9 of the new GDPR laws, provide some of the underpinning purposes for school's data collection.
- Statutory guidance such as Keeping Children Safe in Education

Most commonly, we use it where we need to:

- Fulfil a contract we have entered into with you
- Comply with a legal obligation
- Carry out a task in the public interest

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 go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the school's use of your 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 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, such as complying with Test and Trace legislation, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law
- 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 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 from you is mandatory, there is some information that you can choose whether or not to provide to us.

Occasionally we may need to collect medical data to provide first aid

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 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 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. Our record retention schedule sets out how long we keep information about suppliers.

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

We have a record retention schedule which sets out how long we must keep information. Copies of this schedule can be obtained from the school office.

## Data sharing

We share personal data with the Department for Education (DfE), OFSTED on a statutory basis. This data sharing links to school funding / expenditure.

We will not, without your express consent, provide your personal information to any third parties for the purpose of direct marketing.

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

- *Our Local Authority – to meet our legal obligations to share certain information with it, such as safeguarding concerns and DBS checks*
- *The directors, leaders and members of the BLP and individual school Local Governing Bodies - to meet our legal obligations for such things as information about contracts*
- *The Department for Education*
- *Your family or representatives in an emergency situation*
- *Ofsted*
- *Financial organisations for payment of invoices*
- *Central government*
- *Our auditors*
- *Health authorities in the UK, including services such as Test and Trace*
- *Security organisations*
- *Police forces, courts, tribunals*
- *PFI companies who hold contact details and CCTV images (in schools managed by Pinnacle)*
- *Other educational establishments we collaborate with. For example, Temple Moor and Virtual school to enable us to provide our sixth form provision*
- *Schools ICT to provide back-up computer services*
- *Our insurance brokers and companies who insure our activities, buildings and staff*

## 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 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, you can request us to:

- 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.

## 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:

- In certain circumstances, object to the use of your personal data if it would cause, or is causing, damage or distress where there is no compelling reason for its continued processing.
- Prevent your data being used to send direct marketing.
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- 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 Data Protection Officer.

## 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/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 our Data Protection Officer (DPO):

- [DPO@brigshawtrust.com](mailto:DPO@brigshawtrust.com)

The DPO role is to oversee and monitor the school's data protection procedures, and to ensure they are compliant with the GDPR. If you feel your school's data procedures are not fully compliant in any way, please contact the DPO to discuss the matter.

## **Privacy Policy Changes**

Although most changes are likely to be minor, the Brigshaw Learning Partnership may change its Privacy Policy from time to time, and in the Brigshaw Learning Partnership's sole discretion.

## **Brigshaw Learning Partnership (BLP)**

Brigshaw Learning Partnership is the data controller, The BLP can be contacted at: Brigshaw High School, Brigshaw Lane, Allerton Bywater, Castleford, WF10 2HR Tel: 0113 2878900