



Privacy Policy for Suppliers of Goods and Services

In the development of this policy consideration has been given to Equality and Diversity and Data Protection.

Equality and Diversity

CAMPFIRE EDUCATION TRUST is committed to promoting equality of opportunity for all staff and job applicants. The Trust aims to create a supportive and inclusive working environment in which all individuals are able to make best use of their skills, free from discrimination or harassment, and in which all decisions are based on merit. We do not discriminate against staff based on age; race; sex; disability; sexual orientation; gender reassignment; marriage and civil partnership; pregnancy and maternity; religion, faith or belief (Equality Act 2010 protected characteristics). The principles of non-discrimination and equality of opportunity also apply to the way in which staff and Governors treat visitors, volunteers, contractors and former staff members.

Data Protection

CAMPFIRE EDUCATION TRUST will process personal data of staff (which may be held on paper, electronically, or otherwise). CAMPFIRE EDUCATION TRUST recognises the need to treat it in an appropriate and lawful manner, in accordance with the Data Protection Act 2018 (DPA).

| This Policy is to be used across all Campfire Education Trust Schools | Version | Date |
|---|----------------|--------------------------------|
| Campfire Education Trust Officer responsible for updating content – DPO | 1 | November 2019 |
| Date approved by Campfire Trust Board | | |
| Notice to be reviewed annually from date last approved by Campfire Trust Board | 1 | Annually |
| Policy to be reviewed by Campfire Education Trust (unless statutory revisions require it be done earlier) | | 1 st September 2020 |



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Application of the Policy

This policy is to be used by all employees employed by Trust (CAMPFIRE EDUCATION TRUST). The following definitions are included for reference purposes for both School and Central Team staff to enable clarity and transparency when applying this policy.



Privacy Policy for Suppliers of Goods and Services

Under data protection law, individuals have a right to be informed about how the Trust 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 trust and schools 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, the Campfire Education Trust, Burliegh Piece, Linden Village, Buckingham, MK18 7HX are the 'data controller' for the purposes of data protection law.

Our data protection officer is Julia Steed (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 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 trust or any of our school sites, we may also collect, use and store:

- Information relating to the visit, e.g. the individual's company or organisation name, arrival and departure time, car number plate
- Photographs for identification purposes
- CCTV images captured in school
- Information about any access arrangements that may be required



In this case, our privacy notice for visitors to the school will also apply, this can be found on our website.

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

Our lawful basis for using this data

We only collect and use personal information about you 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 personal information about you 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 requesting your consent and explain how to withdraw 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.

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.

How we store this data

Where personal information is relevant to our contract with you, we keep it according our Record Retention Schedule/Records Management Policy and our statutory obligations which you can access via our website.

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 Record Retention Schedule/Records Management Policy sets out how long we keep this information.

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 need it.

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:

- 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
- The Department for Education
- Educators and examining bodies
- Our regulator [specify as appropriate e.g. Ofsted, Independent Schools Inspectorate]
- Other suppliers and service providers
- Central and local government
- Our auditors – to demonstrate that we have conducted appropriate due diligence during procurement processes
- 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
- Professional bodies

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, 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 complete the form that can be found on our website and return to dpo@campfiretrust.co.uk.

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**:

- Julia Steed, DPO@campfiretrust.co.uk

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

This notice is based on the Department for Education's model privacy notice for parents of pupils, and to reflect the way we use data in this school.