



NPAT SUPPLIERS OF GOODS AND SERVICES PRIVACY NOTICE

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1. INTRODUCTION

We are Northampton Primary Academy Trust (NPAT). Under UK data protection law, individuals have a right to be informed about how our trust, either directly or through 1 or more of our schools, uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This document sets out what personal data we will gather and hold about suppliers of goods and services that the trust, either directly or through 1 of our schools, contracts with, including their individual representatives, employees and agents. References to "you" in this privacy notice cover all of these individuals.

Northampton Primary Academy Trust 'The Trust' is the 'data controller' for the purposes of UK data protection law.

Our Data Protection Officer, Angela Corbyn, is contactable by email at:

DPO@npatschools.org

2. THE PERSONAL DATA WE HOLD

Data that we may collect, use, store share (when appropriate) about you includes but is not restricted to the following;

- 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 or Trust, e.g. the individual's company or organisation name, arrival and departure time, vehicle number plate
- Information about your use of our information and communication systems, equipment and facilities
- Photographs for identification purposes
- DBS checks?
- CCTV images captured in school

If our contract with you requires you to visit or carry out any work at our school sites/premises, our privacy notice for visitors to the school will also apply. This is available on our 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

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 or tribunals

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

3. WHY WE USE THIS DATA

We use the data listed above to:

- a) Decide whether to engage you
- b) Fulfil the terms of our contract with you, including payment
- c) Keep accurate records of the suppliers that we use
- d) Identify you while on the school site, and keep all individuals safe
- e) Keep pupils and staff safe while you are on the school site
- f) Keep accurate records of visits to the school
- g) Make sure our information and communication systems, equipment and facilities (e.g. school computers) are used appropriately, legally and safely

Our lawful basis for using this data

Our lawful bases for processing your personal data for the purposes listed above are as follows:

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest as part of our functions as a Trust
- We have obtained consent to use it in a certain way
- We have entered into a contract with you
- We need to protect the individual's vital interests (or someone else's interests)
- Where the processing is necessary in order to ensure your health & safety on the school site, including making reasonable adjustments any disabilities you may have
- We have a legitimate interest

Our lawful basis to use special category personal data

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 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

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 or trust-wide 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.

Use of your personal data in automated decision making and profiling

We do not currently process any supplier's 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 data for filtering and monitoring purposes

While you're in any of our trust's schools, 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 policy, IT acceptable use policy) and our legal obligations

- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)

4. HOW WE STORE THIS DATA

We keep personal information about you while you work with our trust or 1 or more of our schools. We may also keep it beyond your work with our trust or 1 or more of our schools if this is necessary in order to comply with our legal obligations. For further detail please see our Records Management Policy. Our policies can be found on our school website and the trust 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 dispose of your personal data securely when we no longer need it

5. 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:

Our local authorities, to meet our legal obligations to share certain information with them, such as safeguarding concerns

- Government departments or agencies
- Our regulator, Ofsted
- Suppliers and service 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 or tribunals

6. 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.

7. YOUR RIGHTS

You have the right to request access to personal data that we hold about you, subject to a number of exceptions. To make a request for access to your personal data, you should contact: dpo@npatschools.org

Please also refer to our Subject Access Request Policy, available on the Trust website, for further details on making requests for access to your personal data.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to [complain to the Information Commissioner](#) if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent,

you don't haven't the right to object, but you have the right to withdraw consent.

- If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance or directly to the Information Commissioner's Office at [raise a concern with ICO](#).
- For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

If you want to exercise any of these rights then you should contact dpo@npatschools.org

The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then you will be notified of the reasons why in writing.

8. CONCERNS

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.

Please contact: Data Protection Officer – email: dpo@npatschools.org

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