



Transforming Lives

EDUCATIONAL TRUST

**Data Protection  
Privacy Notice –  
suppliers of goods and  
services**

**June 2024**



## Version Control

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## 1 – The TLET Way

Transforming Lives Educational Trust (TLET) is a family of academies. Every TLET policy is rooted in and reflects our ambitions for pupils, students and wider stakeholders alike.

### OUR AMBITIONS - As a Trust family, our shared ambitions drive everything we do, we call this ‘The TLET Way’.

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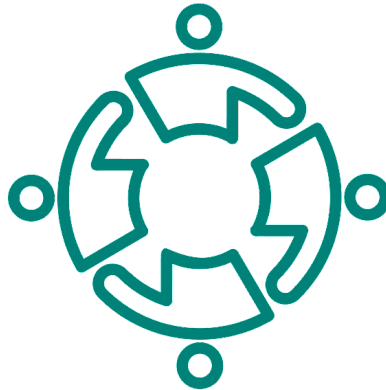
Through the transformative values of courage, kindness and loyalty, together we:



#### NURTURE POTENTIAL

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We flourish in the places we create together.



#### INSPIRE COMMUNITY

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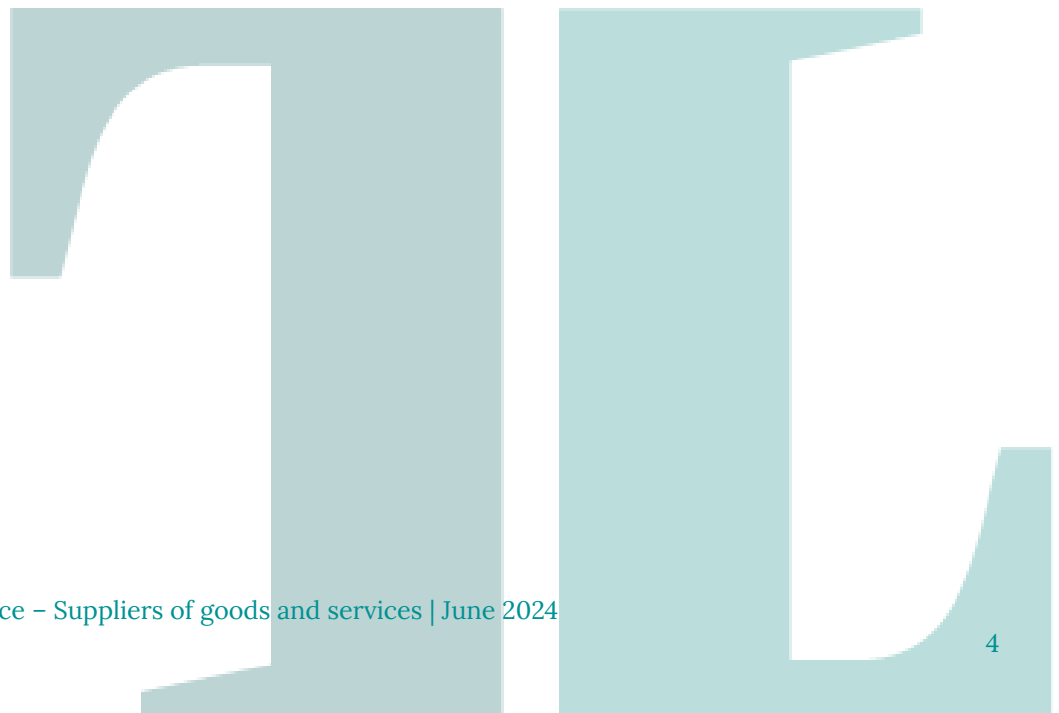
We champion each other to make a difference.



#### DELIVER EXCELLENCE

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We strive to achieve our best.



## 2 – Privacy notice for suppliers of goods and services

Under UK data protection law, individuals have a right to be informed about how Transforming Lives Educational Trust either directly or through one or more of our schools, 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, either directly or through one of our schools, contracts with, including their individual representatives, employees and agents**. References to “you” in this privacy notice cover all of these individuals.

We, Transforming Lives Educational Trust, are the ‘data controller’ for the purposes of UK data protection law.

Our Trust Data Protection Officer is the Director of Operations, with each academy having their own Data Protection Lead (see ‘contact us’ below).

### 2.1 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
- 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, 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

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.

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 or trusts and social services.

## 3 – Why we use this data

### 3.1 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 whole 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 site
- Make sure our information and communications systems, equipment and facilities are used appropriately, legally and safely

### **3.2 Use of your personal data in automated decision making and profiling**

We do not currently process any suppliers 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.

### **3.3 Use of your personal data for filtering and monitoring purposes**

While you're in any of our trusts schools, we may monitor your use of our information and communication systems, equipment and facilities. 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 - Our lawful basis for using this data**

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

- We need to comply with a legal obligation
- We need it to perform an official task in the public interest

We may also process your personal data in situations where:

- We have obtained consent to use it in a certain way a manner which has been specified
- We need to protect the individual's vital interests (or someone else's interests)

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

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

### **4.1 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 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 of 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 confidentially 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

## 5 - Collecting this data

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 department and agencies
- Police forces, courts or tribunals

## 6 - How we store this data

We keep personal information about you while you work with our trust or one or more of our schools. We may also keep it beyond your employment at our Trust if this is necessary. Our Retention and Destruction Policy sets out how long we keep information about staff.

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.

## 7 – 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 staff with, but not limited to, the following:

- Our local authority, Warwickshire County Council – to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Government departments of agencies
- Our regulator, Ofsted
- Suppliers and service providers, including but not limited to:
  - Catering providers
  - HR system providers
  - Filtering and monitoring agencies
- 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

### 7.1 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 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.

## 8 – Your rights

### 8.1 How to access personal information we hold about you



You have a right to make a 'subject access request' to gain access to personal information that we hold about you. If you make a subject access request and if we do hold information about you, we will (subject to any exemptions that make apply)

- 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 us (see 'contact us' below).

## **8.2 Your other rights regarding your data**

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge 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
- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its 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 us (see 'Contact us' below).

## **9 - 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 your academy's Principal. 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

## 10 – Contact us

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

- [dpo@tlet.org.uk](mailto:dpo@tlet.org.uk)

However, our Data Protection Lead has day-to-day responsibility for data protection issues at local academy level, if you have any questions or concerns or would like more information about anything mentioned in this privacy notice, please contact them:

- Henry Hinde School – Fleur Edwards, [principal@henryhinde.tlet.org.uk](mailto:principal@henryhinde.tlet.org.uk)
- Houlton School – Michael McCulley, [principal@houltonschool.org.uk](mailto:principal@houltonschool.org.uk)
- Ashlawn School – Paul Brockwell, [principal@ashlawn.org.uk](mailto:principal@ashlawn.org.uk)

## Related Documents

TLET Privacy Notices

TLET Data Protection Policy

TLET Retention and Destruction Policy