

## Privacy Notice – Suppliers, Contractors and Volunteers

Under data protection law, individuals have a right to be informed about how we, The Extend Learning Academies network (ELAN) use 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 individuals and companies, with whom ELAN or any of its schools enter into a contract for the provision of goods and services, who visit the schools on a voluntary basis for the provision of goods and services, those who attend the schools for the purposes of teaching our pupils, but have not entered into a contract of employment with ELAN, and those who visit our schools for other purposes (hereafter suppliers).

**The Extend Learning Academies Network (ELAN)** is the Data Controller for the use of personal data in this privacy notice.

**The personal data that we collect, process, hold and share about suppliers includes, but is not limited to:**

- Contact details including names, addresses, telephone numbers, email addresses
- CCTV footage captured by ELAN CCTV systems
- vehicle details for those who use ELAN’s car parking facilities.

If necessary for the services you provide, we may also need to collect, use, store and share the following:

- copies of identification documents, including dates of birth; passport and birth certificates, visa details and other contact details
- next of kin and emergency contact numbers
- bank account details for the payment of invoices or reimbursement of expenses
- details of National Insurance numbers and tax status information
- information obtained by the Schools as part of the contractual hiring process, including references given or received by the Schools, CVs or cover letters
- qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- DBS Certificate number and date of issue, prohibition from teaching and management checks, disqualification from childcare declaration form
- performance information, including details and outcomes of any disciplinary and/or grievance procedures and/or complaints or other performance matters
- absence from work data
- medical questionnaires and reports and other relevant correspondence relating to medical conditions
- driving licence details, car insurance and fitness to drive information, for those suppliers driving ELAN’s minibuses or using their own vehicles for business use
- photographs and videos of participation in schools’ activities

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), about race, ethnicity, religious beliefs, sexual orientation, trade union membership, health, including any medical conditions, and sickness records.

### **Why we collect and use this information**

The personal data collected is essential, in order for ELAN to fulfil their official functions, meet legal requirements and help us run the ELAN schools.

We collect and use supplier information to:

- appoint you to provide services to ELAN schools
- meet the statutory duties placed upon us
- to contact you directly when you are not on the premises
- to contact others known to you, where you have provided their information, in cases where it would be reasonable for us to contact that individual
- ensure you remain safe while at ELAN schools, including, when necessary the provision of appropriate medical care or preventative action in the event of an emergency, incident or accident
- enable you to be paid, for such things as expenses, including the use of third party financial systems (for example, banking facilities, BACS payments)
- enable tax and national insurance contributions to be deducted appropriately, including onward payment to HMRC
- assess the professional competence of suppliers to carry out the work/services required by the Schools
- enable appropriate organisational contact (for example, suppliers' lists for both internal and external use, including publication on the ELAN website)
- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- recruit supply agency staff to work in ELAN schools
- monitor performance, including monitoring agency staff absences and performance
- allow better financial modelling and planning, research and statistical analysis, including that imposed or provided for by law (such as diversity or gender pay gap analysis and taxation records)
- enable ethnicity and disability monitoring
- provide references to potential future employers
- provide access to and use of the Schools' IT systems and to monitor use thereof, in accordance with ELAN's Acceptable Use Policy
- order goods and services, including appropriate insurance and professional advice for ELAN
- meet the legal requirements of the Charity Commission and Companies House
- ensure security of the Schools' sites (for example, access passes, issue of access fobs), in accordance with the Schools' use of CCTV

- make use of names, photographs and videos of agency staff in ELAN's publications, on the schools' website and (where appropriate) on the schools' social media channels
- handling legal disputes and claims
- fraud prevention, security and prevention and detection of crime
- obtain appropriate professional advice and insurance for the Schools.

### **The lawful basis on which we process this information**

We collect and use information under Article 6 and Article 9 of the GDPR. This enables the school to process information such as Departmental Censuses under the Education Act 1996 and other such data processes that relate to education provision or payment of the individual. 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
- carry out a task in the public interest.

Less commonly, we may also use personal information about you where:

- you have given us consent to use it in a certain way
- we need to protect your vital interests (or someone else's interests)
- we have legitimate interests in processing the data.

To process special category data we need an additional lawful basis. We will process special category data most commonly where:

- we have your explicit consent
- the processing is necessary under social security or social protection law
- we are processing it in the vital interests of an individual
- we are providing health care or treatment under the responsibility of a health professional

ELAN also has a legal obligation under the Academy Trust Handbook to provide the supplier information as detailed above.

### **Collecting supplier information**

We collect personal information via the recruitment and engagement processes associated with appointing suppliers, contractors and volunteers.

Supplier data is essential for ELAN's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this and we will tell you what you need to do if you do not want to share this information with us.

## **CCTV**

Where CCTV systems are installed on our premises, these are for the purposes of public, pupil and staff safety, crime prevention and detection. Signs are displayed clearly explaining that CCTV is in operation and providing details of who to contact for further information.

We will only disclose CCTV images to others who intend to use the images for the purposes stated above. CCTV images will not be released to the media for entertainment purposes or placed on the internet. Images captured by CCTV will not be kept for longer than necessary.

We hold data securely for the set amount of time shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please see the Data Protection Policy.

## **Storing supplier information**

We create and maintain paper and/or electronic files relating to suppliers. The information is held securely and is only used for purposes directly relevant to your engagement or employment.

Once your relationship with us has ended, we will retain this file and delete the information in it in line with our data retention schedule. A copy of this can be provided to you upon request.

## **Who we share supplier information with**

We routinely share this information with:

- the local authority, to meet our legal obligations to share certain information with them such as safeguarding concerns
- the Department for Education (DfE)
- ELAN central team
- ELAN board members or trustees
- your family or representatives
- suppliers and service providers – to enable them to provide the service we have contracted them for such as occupational health
- financial organisations, such as HMRC
- our auditors
- professional advisers and consultants
- police forces, courts, tribunal
- professional bodies.

## **Why we share supplier information**

We do not share information about our suppliers with anyone without consent unless the law and our policies allow us to do so.

## **Requesting access to your personal data**

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, you should contact the Headteacher in the first instance.

You may also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- a right to seek redress, either through the ICO, or through the courts

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

If you want to see the personal data held about you by the Department, you should make a ‘subject access request’. Further information on how to do this can be found within the Department’s personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the department: <https://www.gov.uk/contact-dfe>

### Privacy notice review

We may need to update this privacy notice periodically so we recommend that you revisit this information from time to time. This privacy notice was last reviewed September 2023.

### Contact

If you would like to discuss anything in this privacy notice, please contact [HR@extendlearning.org](mailto:HR@extendlearning.org)

### Document Control Document Information

	Information
Document Name	Privacy Notice – Suppliers, Contractors and Volunteers
Document Author	Data protection officer (DPO)
Document Approval	Data protection officer (DPO)
Document Status	Version 5.0
Publication Date	July 2024
Review Date	July 2025
Distribution	<i>Website/General</i>

### Version Control

Version	Issue Date	Amended by	Comments
1.0	2019	Data protection co-ordinator	New document
2.0	2020	Data protection co-ordinator	Annual review. No update.
3.0	July 2022	Data protection co-ordinator	Annual review. Document control added.
4.0	Oct 2023	Data protection officer (DPO)	Annual review. No update.

5.0	July 2024	DPO	Annual review – minor updates