



Birchwood High School

School Suppliers & Contractors Privacy Notice

1. Who We Are

Birchwood High School is the **data controller** for the personal data we process about suppliers, contractors, and their representatives. This means we decide how and why your personal information is used.

Contact details

Data Protection Officer (DPO): Charles Gilbank

Email: dpo@birchwoodhigh.org.uk

Telephone: 01279 655936

Address: Parsonage Lane, Bishop's Stortford, CM23 5BD

2. What Personal Data We Collect

We may collect and process personal information relating to suppliers, contractors, and their representatives, including:

- Names, job titles, and organisation details
- Business contact information (email address, telephone number, business address)
- Contractual and procurement information (tender submissions, quotations, references, and due-diligence checks)
- Bank and payment details (for sole traders or where payment is made to a named individual)
- Records of meetings, correspondence, and communications
- Security and safeguarding information required for work on site (e.g. identity verification, DBS status or reference number, visitor logs)
- Incident or complaint records, where relevant
- Vehicle registration details for site access and security

We only collect personal data that is necessary and relevant for the purposes described in this notice.



3. Why We Use This Data

We use supplier and contractor personal data in order to:

- Procure goods and services
- Manage tendering and procurement processes
- Set up, administer, and fulfil contracts
- Communicate regarding orders, services, issues, and contract renewals
- Process payments and maintain financial records
- Carry out due-diligence and suitability checks, including safeguarding requirements
- Maintain site security and visitor management systems
- Meet audit, accountability, and statutory obligations
- Manage complaints, disputes, or insurance matters

4. Lawful Bases for Processing (UK GDPR Article 6)

We process personal data under one or more of the following lawful bases:

- **Contract (Article 6(1)(b))** – where processing is necessary to enter into or perform a contract
- **Legal obligation (Article 6(1)(c))** – where we must comply with financial, audit, safeguarding, health and safety, or other legal duties
- **Public task (Article 6(1)(e))** – where processing supports our statutory functions as a school
- **Legitimate interests (Article 6(1)(f))** – for routine supplier relationship management, where these interests are not overridden by your rights

Where consent is required, it will be requested explicitly and may be withdrawn at any time.

5. Special Category and Criminal Offence Data

In limited circumstances, we may process sensitive personal data, such as:

- Disclosure and Barring Service (DBS) information or safeguarding suitability data
- Health information where relevant to site safety or reasonable adjustments



This data is processed only where necessary and lawful, for example to meet safeguarding duties or substantial public interest requirements, and is protected by appropriate technical and organisational safeguards.

6. Who We Share Your Data With

We may share relevant personal data with:

- The Local Authority or Multi-Academy Trust (where applicable) for governance, finance, or procurement support
- Finance, payroll, procurement, and IT system providers
- Auditors, insurers, and professional legal advisers
- Security and safeguarding service providers (e.g. visitor management systems)
- Regulators or law-enforcement bodies where legally required

We do not sell personal data. Data is shared only where necessary, and all processors are required to keep it secure and act in accordance with our instructions.

7. International Transfers

We do not routinely transfer personal data outside the United Kingdom. Where a service provider stores data internationally, we ensure appropriate safeguards are in place, such as UK adequacy regulations or approved contractual protections.

8. How Long We Keep Your Data

We retain supplier and contractor personal data only for as long as necessary to fulfil the purposes outlined in this notice and to meet legal or audit requirements. Typical retention periods include:

- Procurement and tender records: **6 years after contract end**
- Financial and invoice records: **minimum of 6 years**
- Safeguarding and site access records: **in line with our safeguarding and security retention schedule**



Further details are set out in our retention policy.

9. How We Protect Your Data

We take appropriate technical and organisational measures to protect personal data against loss, misuse, unauthorised access, or disclosure. These include secure storage systems, access controls, staff training, and safeguarding procedures aligned with statutory guidance.

If we intend to use personal data for a new or additional purpose, we will inform you in advance.

10. Automated Decision-Making

Birchwood High School does not use automated decision-making, including artificial intelligence, where decisions would have a legal or similarly significant effect on individuals.

11. Your Data Protection Rights

Under data protection law, individuals have the right to:

- Request access to their personal data (subject access request)
- Request correction of inaccurate or incomplete data
- Request erasure or restriction of processing in certain circumstances
- Object to processing where it causes, or is likely to cause, damage or distress
- Object to direct marketing
- Request data portability, where applicable
- Object to automated decision-making
- Claim compensation for damage caused by a data protection breach

Subject Access Requests

If you make a subject access request, we will respond without undue delay and within **one month**. Where a request is complex, this period may be extended by up to **two additional months**, and you will be informed if this applies.

Our response will include:



- Confirmation of whether we process your personal data
- A description of the data, purposes of processing, and retention periods
- Information about data sources and recipients
- Details of any automated decision-making (if applicable)
- A copy of the personal data in an intelligible format

Requests may be refused or limited only where permitted by the Data Protection Act 2018, for example where an exemption applies. If a request is refused, you will be informed of the reasons and your right to complain to the Information Commissioner's Office (ICO).

Right to complain

You have the right to raise a concern about how we use your personal data with the Information Commissioner's Office (ICO).

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

www.ico.org.uk

Tel: 0303 123 1113

12. Contact Us

If you have any questions about this privacy notice or wish to exercise your rights, please contact:

Data Protection Officer: Charles Gilbank

Email: dpo@birchwoodhigh.org.uk

Telephone: 01279 655936