

Third Party Contractor Privacy Notice

In the course of your engagement with the School, we will collect, use, and hold (process) personal data relating to you as a third-party contractor, consultant, or service provider. This notice sets out how we will use that information and what your rights are under the UK General Data Protection Regulation (UK GDPR).

Who This Notice Applies To

This notice applies to individual self-employed contractors, visiting music teachers, peripatetic workers, and other personnel engaged by the School to provide services. It also applies to directors and staff of contractors who work for a company whose data we may process in the course of managing the contract.

About This Notice

This Privacy Notice explains how the School processes your personal data and your rights in relation to that data. It applies in addition to any specific terms in your contractor agreement or other relevant School policies, such as the IT Acceptable Use Policy.

How We Collect Your Information

We may collect your personal data in several ways, including:

- Directly from you during the tender or application process (e.g., via your CV or proposal).
- From third parties, such as the Disclosure and Barring Service (DBS) for safeguarding checks and referees to verify your suitability.
- Through our interactions during the term of your engagement, such as through the ordinary course of communication, such as email or meeting minutes, records of your work on School systems or signing your attendance into the school site.
- Through images captured by the Schools CCTV, Dash cameras whilst you are working on school premises or for your security badges.

The Types of Information We Collect

We may process the following types of personal data about you:

- **Contact and Biographical Information:** Your name, address, email, telephone numbers, and proof of identity (e.g. passport, driving license etc).
- **Financial Information:** Bank account details and tax status for the purposes of processing invoices and payments.
- **Work-Related Information:** Details of your qualifications, professional memberships, work history, and performance records.
- **Safeguarding and Criminal Record Data:** Information about criminal convictions where necessary for compliance with our legal and regulatory obligations to safeguard pupils.

- **Health Data:** Information concerning health or medical conditions if required to make reasonable adjustments to your working environment. Accident reports where you suffer an injury or ill health on school premises.

Lawful Bases for Processing

The School relies on the following lawful bases to process your data:

Purpose of Processing	Lawful Basis
To manage the contract and process payments	Contractual
To comply with safeguarding, financial and health and safety regulations.	Legal Obligation
To ensure School security and manage performance	Legitimate Interests
To protect the welfare of staff , pupils and customers	Legitimate Interest

Sharing Your Information

We may share your data with certain third parties where necessary, including:

- Internal School departments (e.g., Finance, HR, Compliance or the relevant department lead).
- Government authorities (e.g. HMRC, DfE, police, Home Office, a relevant public health / NHS body and / or local authority) and/or appropriate regulatory bodies e.g. the Independent Schools Inspectorate, the Charity Commission, HSE, ICO.
- Professional advisers (e.g. lawyers, insurers, PR advisers and accountants)
- Third-party background check agencies for necessary vetting.
- Processing by third parties. For the most part, personal data collected by the School will remain within the School and will be processed by appropriate individuals only in accordance with access protocols (i.e. on a 'need to know' basis). However, some functions are outsourced including but not limited to e.g. accounting, IT, cloud storage / records management, monitoring and mailing. In accordance with data protection law, this type of external data processing is always subject to contractual assurances that personal data will be kept securely and used only in accordance with the school's specific directions.
- Safeguarding data. The School is under duties imposed by law and statutory guidance (including Keeping Children Safe in Education or 'KCSIE') to record or report incidents and concerns that arise or are reported to it, in some cases regardless of whether they are proven, if they meet a certain threshold of seriousness in their nature or regularity. This is likely to include notes on personnel or safeguarding files, low-level concerns records kept about adults (which may include references to pupils or family members), and in some cases referrals to relevant authorities such as the LADO, Children's Services, CAMHS or the police.

Data Retention

The School will retain personal data securely and only in line with how long it is necessary to keep for a legitimate and lawful reason. As a general rule, we may retain your personal data for a period of **7 years** after your contract has expired or been terminated. Some information, such as safeguarding records, may be retained longer in accordance with specific legal requirements and our Retention of Records policy.

If you have any specific queries about how our retention policy is applied or wish to request that personal data that you no longer believe to be relevant is considered for erasure or please contact The Compliance Office at compliance@culford.co.uk. However, please bear in mind that the School will often have lawful and necessary reasons to hold on to some personal data even following such a request.

A limited and reasonable amount of information will be kept for archiving purposes, for example; and even where you have requested we no longer keep in touch with you, we will need to keep a record of the fact in order to fulfil your wishes (called a suppression record).

Data Accuracy and Security

The School will endeavour to ensure that all personal data held in relation to an individual is as up to date and accurate as possible. Individuals must notify the relevant person of any significant changes to important information, such as contact details, held about them.

An individual has the right to request that any out-of-date, irrelevant or inaccurate or information about them is erased or corrected (subject to certain exemptions and limitations under data protection law); please see above for details of why the School may need to process your data, of who you may contact if you disagree.

The School will take appropriate technical and organisational steps to ensure the security of personal data about individuals, including policies around use of technology and devices, and access to school systems.

Your Rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Compliance Office at compliance@culford.co.uk

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time.

Responsibility for Data Protection

The School has appointed the Head of Compliance as the Data Protection Lead who will deal with your requests and enquiries concerning the School's processing of your personal data (see section on Your Rights above) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law. You can contact the School's Head of Compliance using these details:

The Head of Compliance, Culford School, Culford, Bury St Edmunds, Suffolk, IP28 6TX or email Compliance@culford.co.uk

Data Protection Complaints

If you believe that we have broken your data protection or privacy rights, or you are unhappy with how the school has managed your data, you can complain to us direct by contacting the Compliance Office Compliance@culford.co.uk. Culford School's Data Protection Complaints Policy has further information about the complaints process.

If you are not happy with our response, or you want to contact the UK Information Commissioner's Office, which regulates and enforces data protection law in the UK, you can find details about how to do this at www.ico.org.uk.

If you have any questions about this privacy notice, please contact the Compliance Office on the details above.