

**PRIVACY NOTICE FOR:
TRUSTEES;
SUPPLIERS, PROVIDERS AND CONTRACTORS;**

CONSULTANTS; JOB APPLICANTS; AGENCY WORKERS; AND WEBSITE USERS

At The Sheiling Special Education Trust, we are committed to protecting and respecting your privacy. This privacy notice explains what personal information we collect about you, how and why we process (collect, store, use and share) your personal information, your rights in relation to your personal information and how to contact us or make a complaint.

When we process your personal information, we are regulated under European and national data protection laws and we are responsible as 'controller' of that personal information for the purposes of those laws.

By 'personal information', we mean information which relates to you as an individual and tells us something about you. It does not include information relating to organisations.

1 The personal information we collect and use

The personal information we collect, and the use we make of it, varies depending on our relationship with you. For that reason, this privacy notice distinguishes between our Trustees, Providers/Suppliers, contractors, consultants, agency workers and website users. Please be sure to read the sections of the privacy notice which relate to you.

2 Trustees of SSET

2.1 Personal information we collect about you includes:

- 2.1.1** Your name, contact details (phone, fax, telephone, email and address);
- 2.1.2** Characteristics information, such as gender, age, ethnic group, gender, religion and marital status (for the purpose of equal opportunities monitoring)
- 2.1.3** Personal information regarding your skills, qualifications and experience (where relevant, including any relevant employment history and/or training courses attended);
- 2.1.4** Details relating to your eligibility to be a Trustee, including that you are not disqualified or prevented from acting in this capacity/role;
- 2.1.5** Details relating to any conflicts of interest, including: any relevant material business or pecuniary interests; any governance roles in other educational institutions; and/or material interests arising from close family relationships or with senior employees of SSET;
- 2.1.6** Criminal records information, including the results of an enhanced Disclosure and Barring Service (DBS) check and section 128 checks (as required)
- 2.1.7** Bank details for the purposes of processing any expenses claims made by you in the course of your duties;
- 2.1.8** Information on grievances raised by or involving you;
- 2.1.9** Your image, in photographic and video form, for example in CCTV images;
- 2.1.10** Details of your use of business-related social media, such as LinkedIn;

- 2.1.11 Other personal information provided by you.
- 2.2 SSET also puts a photograph and biography information about each Trustee on the Trustee Register, which is available on the SSET website.
- 2.3 How we collect your personal information
 - 2.3.1 We collect personal information about you when you apply to us to be Trustee of SSET and during any ongoing relationship with the organisation in your role.
 - 2.3.2 Occasionally we may receive information about you from other sources, such as Disclosure and Barring Service (DBS) or other public authority.
- 2.4 How we use your personal information
 - 2.4.1 We use your personal information to assess your suitability for the position of Trustee, to communicate with you in relation to that role and to record the administration and governance of SSET. We cannot do this without your personal information.
 - 2.4.2 We may monitor and record communications with you (such as emails) for the purposes of good governance.
- 2.5 Who we share your personal information with
 - 2.5.1 Generally, we will not share your information with anyone outside SSET unless we are legally obliged to do so, for example with the regulators, (eg Ofsted and the CQC) DfE, Edubase, Companies House, Charity Commission (as may be required). However, your data will be stored on our personnel databases.
 - 2.5.2 However, we will share personal information with law enforcement or other authorities if required by applicable law
 - 2.5.3 We will not transfer your personal information outside the UK.
- 2.6 How long we keep your personal information for

We will keep your personal information in line with any statutory requirements and for a minimum of seven years after you cease to be a Trustee.
- 2.7 The legal basis on which we collect and use your personal information
 - 2.7.1 We process your personal information on the following legal bases:
 - (a) our and your legitimate interests in the administration of SSET as you would reasonably expect and without materially impacting your rights, freedom or interests;
 - (b) to comply with a legal obligation; and/or
 - (c) performance of a task carried out in the public interest as an education provider.
- 3 Suppliers, providers and contractors¹**
- 3.1 Personal information we collect about you

¹ This includes potential suppliers, providers and contractors.

- 3.1.1 Your name, contact details (phone, fax, telephone, email and address), employer organisation and job title. Some of this information may be obtained directly from your employer or via its website.
 - 3.1.2 Your bank details, tax or VAT number (including information on VAT status) and credit report.
- 3.2 How we use your personal information
 - 3.2.1 We use this information to communicate with you or your employer organisation regarding the provision of goods and services to us.
 - 3.2.2 We use your financial information to manage and administer our accounts with you regarding the provision of goods and services to us.
 - 3.2.3 Supplier information is used to pay invoices, check VAT status and to check registration at Companies House.
- 3.3 Who we share your personal information with
 - 3.3.1 Generally, we will not share your information with anyone except relevant SSET employees, regulators or your employer organisation.
 - 3.3.2 We will not transfer your personal information outside the UK.
 - 3.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.
- 3.4 How long we keep your personal information for

We keep your personal information for seven years after you cease to be a supplier or contractor of ours.
- 3.5 The legal basis on which we collect and use your personal information

We process your personal information on the basis that it is necessary to comply with our contractual obligations with you and where it serves our and your legitimate interests to be able to communicate in a way that you would reasonably expect and which does not materially impact your rights, freedoms or interests.

4 Consultants²

- 4.1 Personal information we collect about you
 - 4.1.1 Personal information, such as your name, contact details (address, home and mobile phone numbers, email address) and emergency contacts (name, relationship and home and mobile phone numbers);
 - 4.1.2 Characteristics information, such as gender, age, ethnic group, religion and marital status;
 - 4.1.3 Information collected during the appointment process and references;
 - 4.1.4 Contract information, such as start date, hours worked, post and role;
 - 4.1.5 Employment history details;
 - 4.1.6 Bank details and relevant tax information;

² This includes potential consultants.

- 4.1.7 Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information, including right to work in the UK;
 - 4.1.8 Criminal records information, including the results of Disclosure and Barring Service (DBS) checks and section 128 checks (as required);
 - 4.1.9 Professional body registration details and details of regarding your professional indemnity insurance if relevant
 - 4.1.10 Information on grievances raised by or involving you;
 - 4.1.11 Information on conduct and/or other disciplinary issues involving you;
 - 4.1.12 Details of your time and attendance records;
 - 4.1.13 Information regarding your work output and/or performance;
 - 4.1.14 Information about your use of our IT, communication and other systems, and other monitoring information;
 - 4.1.15 Your image, in photographic and video form, for example in CCTV images;
 - 4.1.16 Details of your use of business-related social media, such as LinkedIn;
 - 4.1.17 Your use of public social media (only in very limited circumstances, to check specific risks for specific functions within our organisation; you will be notified separately if this is to occur); and
 - 4.1.18 Details in references about you that we give to others.
- 4.2 How we use your personal information
- 4.2.1 We use this information to communicate with you regarding the provision of services to us.
 - 4.2.2 We use your financial information to process the payment of invoices submitted to us by you.
 - 4.2.3 We check your VAT status and credit status.
 - 4.2.4 We check your right to work in the UK.
 - 4.2.5 We cannot do this without your personal information.
- 4.3 Who we share your personal information with
- 4.3.1 Generally, we will not share your information with anyone except relevant employees and site managers.
 - 4.3.2 We will not transfer your personal information outside the UK.
 - 4.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.
- 4.4 How long we keep your personal information for
- We keep your personal information for seven years after you cease to be a supplier of ours.
- 4.5 The legal basis on which we collect and use your personal information

We process your personal information on the basis that it is necessary to comply with our contractual obligations with you and where it serves our and your legitimate interests to be able to communicate in a way that you would reasonably expect and which does not materially impact your rights, freedoms or interests.

5 Job applicants

5.1 Personal information we collect about you

- your name, contact details (mobile phone, email and address details);
- your qualifications, references and other information contained within your curriculum vitae;
- details of your education and employment history;
- your gender, date of birth and marital status_(including sensitive personal information regarding your sexual orientation);
- your NI number;
- your organisation membership details_(where necessary for the role in question);
- criminal records information;
- your racial and ethnic origin, religious or philosophical beliefs and disability status;
- your username for the recruitment portal;
- your IP address;
- other personal information provided by you.

5.2 How we use your personal information

We use your personal information for the following purposes:

- to assess your suitability for a job and contact you in relation to that job;
- to check your right to work in accordance with our legal obligations;
- to monitor our recruitment processes for equality and diversity purposes.

Who we share your personal information with

Generally, we will not share your information with anyone outside SSET or outside the UK. We will only share your data with the Disclosure and Barring Service and your employment agency (where necessary).

However, we will share personal information with law enforcement or other authorities if required by applicable law.

5.3 Whether information has to be provided by you, and if so why

The provision of your name, contact details, CV, qualifications and references are necessary for us to assess your suitability for the particular job. We cannot do this without this personal information. We will inform you if the provision of any additional information is mandatory.

5.4 How long we keep your personal information for

We will keep your personal information for 6 months from the date of rejection for a job role or, if you are accepted for a job role, in accordance with our Privacy Notice for Staff.

5.5 The legal basis on which we collect and use your personal information

We process your personal information on the basis of entering into a contract of employment to consider your job application as you would reasonably expect and without materially impacting your rights, freedom or interests. We process your sensitive personal information to check your right to work and suitability for the role.

6 Agency Workers

6.1 Personal information we collect about you

- your name, contact details (mobile phone, telephone, email and address);
- your qualifications, and other information contained within your curriculum vitae;
- your date of birth;
- criminal records information, including the results of Disclosure and Barring Service (DBS) checks/DBS number and issue date;
- your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information (including sensitive personal information regarding your racial and ethnic origin);
- copies of identification documents such as a copy of your driving licence or agency ID card; and
- your image in photographic form;
- other personal information provided by you.

6.2 How we use your personal information

We use your personal information for the following purposes:

- to maintain our single central record of staff;
- to assess your suitability for engagement as temporary cover and
- to meet the requirements of keeping Children Safe In Education

6.3 Who we share your personal information with

Generally, we will not share your information with anyone outside SSET or outside the UK. We will only share your data with the Disclosure and Barring Service, the regulators and your employment agency (where necessary).

However, we will share personal information with law enforcement or other authorities if required by applicable law.

6.4 Whether information has to be provided by you, and if so why

The provision of your name, contact details, CV, qualifications and DBS check details are necessary for us to assess your suitability for the particular job and maintain our record of employees. We cannot do this without this personal information. We will inform you if the provision of any additional information is mandatory.

6.5 How long we keep your personal information for

We will keep your personal information for 12 months from the end of your assignment or, if you are accepted for a employed role at SSET, in accordance with our Privacy Notice for Staff.

6.6 The legal basis on which we collect and use your personal information

We process your personal information in accordance with our legal obligations.

7 Website users

7.1 Personal information we collect about you

7.1.1 Your name, email, address and other details you may choose to provide when you register or make an enquiry via our website. We also collect personal information when you post material to our website.

7.2 How we use your personal information

7.2.1 We use this information to identify and communicate with you;

7.2.2 Process your enquiry or request;

7.2.3 Notify you of any changes to our website that may affect you.

We cannot do this without your personal information.

7.3 Who we share your personal information with

7.3.1 Generally, we will not share your information with anyone except SSET.

7.3.2 We will not transfer your personal information outside the UK.

7.3.3 However, we will share personal information with law enforcement or other authorities if required by applicable law.

7.4 How long we keep your personal information for

7.4.1 We keep your personal information in line with the SSET retention of records schedule;

7.5 The legal basis on which we collect and use your personal information

7.5.1 We process your personal information on the following legal bases:

- (a) our and your legitimate interests in the administration of SSET as you would reasonably expect and without materially impacting your rights, freedom or interests;
- (b) to comply with a legal obligation; and/or
- (c) performance of a task carried out in the public interest as an education provider.

8 Consequences of our use of your personal information

Our processing of your personal information allows us to decide whether or not to enter into a contract with you, to perform that contract and manage it in the interests of our business.

9 Transfer of your information out of the EEA

We do not intend to transfer your information out of the UK or outside of the EEA during the course of our general operations. The data we hold is stored in the UK. In the event that we do need to transfer your data overseas, we will inform you accordingly.

10 Your rights

10.1 Under data protection laws you have a number of important rights free of charge. In summary, those include the right to:

- 10.1.1** access to your personal information and to certain other supplementary information that this Privacy Notice is already designed to address;
- 10.1.2** require us to correct any mistakes in your information which we hold;
- 10.1.3** require the erasure of personal information concerning you in certain situations;
- 10.1.4** receive the personal information concerning you which you have provided to us, in a structured, commonly used and machine-readable format and have the right to transmit that information to a third party in certain situations;
- 10.1.5** object at any time to processing of personal information concerning you for direct marketing;
- 10.1.6** object in certain other situations to our continued processing of your personal information; and
- 10.1.7** otherwise restrict our processing of your personal information in certain circumstances.

10.2 For further information on each of those rights, including the circumstances in which they apply, see the [Guidance from the UK Information Commissioner's Office \(ICO\) on individuals rights under the General Data Protection Regulation](#).

10.3 If you would like to exercise any of those rights, please:

- 10.3.1** Email, call or write to us - all correspondence to be marked for the attention of our Data Protection Lead (please see 'How to Contact Us' below)
- 10.3.2** let us have enough information to identify you;
- 10.3.3** let us have proof of your identity and address (a copy of your driving licence or passport and a recent utility or credit card bill); and

10.3.4 let us know the information to which your request relates.

11 Keeping your personal information secure

- 11.1 We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.
- 11.2 We also have procedures in place to deal with any suspected information security breach. We will notify you and any applicable regulator of a suspected information security breach where we are legally required to do so.

12 Changes to this privacy notice

- 12.1 This Privacy Notice was last updated on 19th December 2018.
- 12.2 We may change this Privacy Notice from time to time and when we do, a copy of the amended version will be available on the SSET website.

13 How to complain

- 13.1 We hope that we can resolve any query or concern you raise about our use of your information. If you have a concern about the way we are collecting or using your information, we ask that you raise your concern with us in the first instance.
- 13.2 You also have the right to complain to the UK Information Commissioner, who may be contacted at <https://ico.org.uk/concerns/> or by telephone on 0303 123 1113. If you live or work elsewhere in the EU or EEA, you can also complain to your local supervisory authority.

14 How to contact us

- 14.1 Please contact us if you have any questions about this privacy notice or the information we hold about you.
- 14.2 If you wish to contact our Data Protection Lead please:
- 14.2.1 send an email to dataprotection@thesheilingringwood.co.uk; or
 - 14.2.2 write to c/o SSET, Horton Road, Ashley, Ringwood, Hampshire, BH24 2EB; or
 - 14.2.3 call 01425 477488.

15 Do you need extra help?

- 15.1 If you would like this notice in another format (for example: large print) please contact us (see 'How to contact us' above).