



Privacy Notice for Third Parties

FROM APRIL 2026

Aquinas Church of England Education Trust





Policy control			
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V1	03/09/24	MCA	Placed in new house style following the school bus template
V2	30/04/26	MCA	Updated to reflect The Data (Access and Use) Act 2025



Template

Privacy notice for Third Parties

This privacy notice is for third party contractors or volunteers providing services at **Bishop Ridley Church or England Primary School** (the Academy) part of **AQUINAS Church of England Education Trust** (the Trust).

The Academy collects a lot of data and information about individuals working or volunteering at the Academy so that we can run effectively as a school and so that we and the Trust can comply with our contractual, health and safety and safeguarding responsibilities. This privacy notice explains how and why we collect data from you, what we do with it and what rights you have in relation to the personal data and information collected.

Why do we collect and use your information?

We collect and use your information under the following lawful bases:

- a. where we have the consent of the data subject (Article 6 (a));
- b. where it is necessary for the performance of a contract with the data subject (Article 6 (b));
- c. where it is necessary for compliance with a legal obligation (Article 6 (c));
- d. where processing is necessary to protect the vital interests of the data subject or another person (Article 6(d));
- e. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (Article 6 (e)).
- f. where it is necessary for the purpose of recognised legitimate interests. This condition is lawful basis for the Trust in limited public interest conditions such as the sharing of information for the safeguarding of children, for the prevention, detection or investigation of a crime, emergency response or to support another organisation's public interest task.

Where the personal data we collect about you is sensitive personal data, we will only process it where:

- a. we have explicit consent;
- b. processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent; and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. In addition, the processing satisfies one of the requirements of Schedule 1 Part 2 of the Data Protection Act 2018.

Please see the Trust's Data Protection Policy for a definition of sensitive personal data.

We use your data to support our statutory functions of running a school and in order to meet our contractual, health and safety and safeguarding responsibilities, in particular:

- a. to ensure that you are recompensed for your services where relevant;
- b. to assess the need for the services provided;
- c. to assess the quality of the services provided by;
- d. for the protection and welfare of pupils and others in the Academy;
- e. for the safe and orderly running of the Academy.
- f. for the administration and business functions of the Academy.



The categories of information that we collect, hold and share include:

- a. Personal information (such as name, address, date of birth);
- b. Contractual information, where relevant (such as references, professional qualifications, employment checks including disclosure and barring service check, contract, job description, payment details);
- c. Information included on a volunteer application
- d. Medical Information (such as disability/ condition);
- e. Health and safety information (such as accident reports);
- f. Photographs taken for employment records and security cards which are held on the personal file and on the Academy's information management system;
- g. CCTV footage.

From time to time and in certain circumstances, we might also process personal data about you some of which might be sensitive personal data, including information about criminal proceedings / convictions, and child protection / safeguarding. This information is not routinely collected and is only likely to be processed by us in specific circumstances such as a child protection or criminal matter. Where appropriate, such information may be shared with external agencies such as the child protection team at the Local Authority, the Local Authority Designated Officer and / or the Police. Such information will only be processed to the extent that it is lawful to do so and appropriate measures will be taken to keep the data secure.

We collect information about you when you begin working or volunteering with the Trust and it is updated during your time working or volunteering at the Trust as and when new information is acquired or created. We may also ask you to review some of the personal information we hold to ensure that it is accurate.

Collecting information about you

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the Data Protection Legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this. Where appropriate, we will ask you to consent to processing personal data where there is no other lawful basis for processing it. Where you have given consent for the processing of personal information for a specific purpose, you are entitled to withdraw consent at any time.

Storing your data

We hold personal data in accordance with the Trust's Document Management and Retention Policy. A significant amount of personal data is stored electronically, for example, on our database, information management systems, finance and payroll systems and IT systems. Some information may also be stored in hard copy format.

Data stored electronically will be saved on VSL On Premises to Cloud backup. Veeam Endpoint is used to back up server data to a local NAS for faster recovery. All data storage centres are located within the UK and Europe. The contracts with these providers contain the necessary provisions to ensure the security of personal data. All data is backed up and measures are in place to protect the data from cyberattacks and ransomware

Who do we share your information with?

The information and data you have provided with is routinely shared with senior leaders at the Academy and staff within Trust's human resources, payroll and finance departments, where necessary.



From time to time, we may also need to share your information other third parties including the following:

- the Police and law enforcement agencies;
- healthcare professionals;
- Courts, if ordered to do so;
- Local Authority Designated Officer;
- Prevent teams in accordance with the Prevent Duty on schools;
- our legal advisers;
- the Risk Protection Arrangement;
- Disclosure and Barring Service.

Some of the above organisations may also be Data Controllers in their own right in which case we will be jointly controllers of your personal data and may be jointly liable in the event of any data breaches. In the event that we share your personal data with third parties, we will provide the minimum amount of personal data necessary to fulfil the purpose for which we are required to share the data.

Why we share your information

We do not share information about you with anyone without consent unless the law allows us to do so.

Requesting access to your personal data

Under data protection legislation, you have the right to request access to information we hold about you ("Subject Access Request"). To make a request for your personal data, contact one of the following; although any written request for personal data will be treated as a Subject Access Request.: The Trust's Data Protection Officer: Mary Capon by writing to her at Aquinas Trust, Magpie Hall Lane, Bromley BR2 8HZ or emailing her at info@aquinatrust.org and inserting 'subject access request' in the subject box.

The Academy's Data Protection Lead: admin@bishop-ridley.bexley.sch.uk

Subject to the section below, the legal timescales for us to respond to a Subject Access Request is one calendar month. As we have limited staff resources outside of term time, we encourage you to submit Subject Access Requests during term time and to avoid sending a request during periods when the Academy is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see the Trust's Data Protection Policy.

You 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 subject to the Trust's Data Protection Policy;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of our data protection responsibilities.

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with us in the first instance by contacting the Trust's data protection officer or the Academy's data protection lead. Alternatively, you can contact directly the Information Commissioner's Office at <https://ico.org.uk/concerns/>



Complaints

If you have concerns about how we use your personal data or wish to make a complaint about our compliance with data protection law, you should contact the Trust data protection officer (DPO) in the first instance.

Email: info@aquinatrust.org

Post: Data Protection Officer, Aquinas Church of England Education Trust, Magpie Hall Lane, Bromley BR2 8HZ

We take all data protection complaints seriously and will follow the procedure and investigate them in accordance with our Data Protection Policy

Updating this privacy notice

We may need to update this privacy notice periodically if we change how we collect and process data. The Academy will inform you when this privacy notice has changed; however, we also recommend that you revisit this privacy notice periodically.

How can you find out more information?

If you have any queries regarding this notice or the use of your personal information, please contact:

- The Trust's data protection officer, Mary Capon, who can be contacted by writing to her at The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ, by emailing info@aquinatrust.org or calling 0203949 7000.
- Alternatively, you can contact the academy Data Protection Lead, Stuart Keep at admin@bishop-ridley.bexley.sch.uk.

If you require further information about how we and/or the DfE store and use your personal data, please visit our website at www.aquinatrust.org and the Gov.UK website, (<https://www.gov.uk/guidance/data-protection-how-we-collect-and-share-research-data>) or download our Data Protection Policy and Records Management Policy from the website.