



ACE Schools Multi Academy Trust

# Managing Sub-Contracted Processing

Issue	Date	Author/Reviewer Job Role	Comments	Signed by DPO
	12/3/19	<i>Kristy Gouldsmith</i>		<i>K Gouldsmith</i>

## Contents

MANAGING SUB-CONTRACTED PROCESSING	1
1 Scope.	1
2 Responsibilities.	1
3 Procedure	1

# MANAGING SUB-CONTRACTED PROCESSING

## 1 Scope.

- 1.1 All external suppliers that process personal data on behalf of ACE Schools MAT are within the scope of this procedure.

## 2 Responsibilities.

- 2.1 [Insert relevant department] is responsible for approving the selection of all sub-contracted processors of personal data in line with the requirements of this procedure.
- 2.2 The [owners] of third-party relationships are responsible for ensuring that all data processing is carried out in line with this procedure.
- 2.3 The Head of IT is responsible for ensuring that adequate technical and other resources that might be required are made available to support the relationship [owner] in the monitoring and management of the relationship.
- 2.4 [Insert relevant department] is responsible for carrying out regular audits of third-party compliance.

## 3 Procedure

- 3.1 ACE Schools MAT selects only suppliers that can provide technical, physical and organisational security that meet ACE Schools MAT's requirements in terms of all the personal information they will process on ACE Schools MAT's behalf.
- 3.2 Suppliers from outside the EU will only be selected under the following conditions, in addition to the conditions noted elsewhere in this procedure:
  - 3.2.1 If the supplier or the state in which it resides has been positively identified in an adequacy decision by the EU Commission; and
  - 3.2.2 Where there are EU Model Contracts in place.

- 3.3 An information security risk assessment and an audit of the supplier's data protection policies and procedures may be conducted before entering into the contract.
- 3.4 ACE Schools MAT requires a written agreement to provide the service as specified and requires the supplier to provide appropriate security for the personal information it will process.
- 3.5 All data processing contracts allow ACE Schools MAT to conduct regular audits of the supplier's security arrangements during the period in which the supplier has access to the personal information.
- 3.6 All data processing contracts forbid suppliers from using further subcontractors without ACE Schools MAT's written authorization for the processing of personal information.
- 3.7 Contracts with second-level subcontractors will only be approved if they require the subcontractors to comply with at least the same security and other provisions as the primary subcontracting organisation (the supplier) if they specify that, when the contract is terminated, related personal information will either be destroyed or returned to ACE Schools MAT.