

# Academies Trust

2nd Floor, 1 Angel Square,  
Manchester, M60 0AG



## Privacy Notice

## Job Applicants

This document will be reviewed annually and sooner when significant changes are made to the law.

## Contents

Contents	2
1. Privacy Notice (How we use candidate information)	3
2. The categories of school workforce information that we process include:	3
3. Why we collect information about job applicants	4
4. How we collect information about job applicants	5
5. How, where and for how long we store workforce information	5
6. Who we share your data with	6
7. Why we share information about job applicants	6
9. Requesting access to your personal data	7
11. Last updated	7
12. Contacts	8

## 1. Privacy Notice (How we use candidate information)

As part of any recruitment process, the Co-op Academies Trust collects, holds, uses and shares information relating to job applicants. This is known as “personal data” and you have rights around that data, including knowing how and why we are processing the data. “Processing” data means everything from collecting, to storing, using, sharing and disposing of it. The term ‘job applicants’ includes all those individuals who apply for a position with the Trust either with the Central Team or at any of our academies.

The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

For the purposes of Data Protection legislation the Co-op Academies Trust is a data controller and is registered as such with the Information Commissioner’s Office.

## 2. The categories of school workforce information that we process include:

- Personal information (such as name, address and contact details, including email address and telephone number, date of birth and national insurance number)
- Details of your qualifications, skills, experience and education and employment history, including any breaks;
- Information about your current level of remuneration, including benefit entitlements;
- Any close personal relationships you have with those connected with our organisation;
- Whether you have a disability for which the organisation needs to make reasonable adjustments during the recruitment process\*;
- Information about your entitlement to work in the UK, criminal history, and any disqualification or sanction imposed by a regulatory body in relation to working with children/teaching\*.
- Equalities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief\*
- References supplied by former employers
- Information from employment background checks

If you are shortlisted, the organisation will view data about you which is publicly available on-line for the purposes of identifying any concerns about suitability to work with children and to verify employment history.

## 3. Why we collect information about job applicants

We use data from job applicants to:

Undertake the recruitment process and, for the successful applicant, to enter into a contract of employment. In particular it is used to:

- a) Administer the application, shortlisting and selection process
- b) Assess your suitability to work with children and young people
- c) Inform the development of recruitment and retention policies
- d) Defend legal claims

Under the UK General Data Protection Regulation (UK GDPR), the legal basis for processing your personal information include:

- Article 6(c) - Compliance with our legal obligations. For example, it is a requirement to check a successful applicant's identity and eligibility to work in the UK before employment starts and to undertake checks in relation to qualifications, prohibitions, disqualifications and to comply with the Department for Education's statutory guidance "Keeping Children Safe in Education in relation to other pre-employment checks. It is our policy, in line with this statutory guidance to request references at the shortlisting stage, in advance of interview.
- Article 6(f) – For legitimate Interests. The Trust has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Trust to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Trust may also need to process data from job applicants to respond to and defend against legal claims.
- Article 6(a) – Your consent (for any processing which does not fall into the other bases explained above). For example, if your application is unsuccessful, the organisation may keep your personal data on file in case there are future employment opportunities for which you may be suited. The organisation will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

The ways we collect and use *sensitive* data about job applicants is lawful based on:

- Your explicit consent
- For compliance with certain legal obligations
- For exercising certain legal rights;
- For health and public health reasons
- For carrying out tasks that are in the substantial public interest including for safeguarding purposes.

The Trust processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Pre-employment health screening is also required by Regulations.

Please refer to our Special Category Data Policy document for full details of these lawful bases for processing this data. Types of data that are special category are indicated above by \*.

We do not make recruitment decisions based on automated decision making or profiling. Should this change in the future, privacy notices will be updated to explain both the processing and your right to object to it.

#### 4. How we collect information about job applicants

We collect this information in a variety of ways. For example, data is collected through application forms; from your passport or other identity documents such as your driving licence; from correspondence with you, through interviews or other assessments, from previous employers, from the NHS, the Police, the Disclosure and Barring Service, background check providers, the Teacher Regulation Agency and the Department for Education [DfE].

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the organisation may not be able to process your application properly or at all. If your application is successful, it will be a condition of any job offer that you provide evidence to enable us to process all required pre-employment checks.

#### 5. How, where and for how long we store workforce information

Data will be securely stored in a range of different places, including our FACE'Ed Recruitment Platform, our SAM People HR Platform (part of Fusion Education People Systems), and in our Google Workspace. On limited occasions, we may store the information in paper based records.

We also use email to enable authorised users to transfer information to one another.

We only keep the information for the length of time we need it for, as shown in our data retention schedule. For more information on our data retention schedule, please visit our data retention policy here:

<https://www.coopacademies.co.uk/page/?title=GDPR+and+Data+Protection&pid=44>

Should you be successful in your application, your information will be transferred to your personnel file and you will be issued with a separate privacy notice explaining how that data will be managed.

We dispose of personal information securely when we no longer need it.

The Trust takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed,

misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

## 6. Who we share your data with

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process, and other colleagues where access to the data is necessary for the performance of their roles.

The organisation will share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks.

Your personal information may be transferred outside the UK and the European Economic Area ('EEA'), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as "adequate" in relation to data protection law, the information is adequately protected by the use of International Data Transfer Agreements and security measures, and other appropriate safeguards. For more information on international transfers, please contact us at the details below.

## 7. Why we share information about job applicants

We do not share information about job applicants with anyone without consent unless the law and our policies allow us to do so.

## 8. Freedom of Information Act and Environmental Information Regulations 2004

As a public body, our Trust is subject to requests made under the above legislation. Therefore, we have a legal obligation to process any personal data we hold when considering requests under these laws.

For example, we may receive a request asking about numbers of applicants with particular levels of professional qualification.

However, we will never disclose personal data in our responses to these requests where to do so would contravene the principles of data protection.

## 9. Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. Individuals wishing to make a request should contact the Trust's Data Protection Officer using the contact details provided below.

You also have the right to:

- Be informed about the collection and use of your personal data.
- Rectification, ie to have inaccurate personal data rectified, or completed if it is incomplete.
- Erasure, often known as the 'right to be forgotten'; however this does not apply where, amongst other things, processing is necessary to comply with a legal obligation.
- Restrict processing, although, as above this is a limited right.
- Object; though other than for marketing purposes, this is also limited as above.

Where we rely on your consent to process your data, you have the right to withdraw that consent. If you do change your mind, or you are unhappy with our use of your personal data, please let us know

You also have rights in relation to automated decision making and profiling, though these are not currently relevant

Finally, you have the right to seek redress, either through the ICO, or through the courts.

If you make a request, we will keep a record of the request and any personal data supplied for a suitable period after its fulfilment, in order to deal with any questions you, your representatives or regulators may have about it.

## 10. Last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in October 2024.

## 11. Contacts

If you have a concern about the way we are collecting or using your personal data or you would like to discuss anything in this privacy notice, we ask that you raise your concern with us in the first instance.

You may discuss your concerns with the Trust's Head of Data Protection:

Head of Data Protection	Tammy Pyszky
Email:	data@coopacademies.co.uk
Phone:	07815654419

If however you are dissatisfied with our response to your concerns you can of course contact the ICO (contact details below) quoting our ICO registration number ZA201403 and stating that the Data Controller is The Co-op Academies Trust.

Information Commissioners' Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Tel: 0303 123 1113 (local rate) or 01625 545 745 if you prefer to use a national rate number

Fax: 01625 524 510

Website: <https://ico.org.uk/concerns/>