

# **Privacy notice for job applicants**

Approved by:	Trust Board	Date:	10.10.25
Reviewed on:	10.10.25	Date of next review:	10.10.26

#### **Version Control Updates**

Date of review	Reviewer	Amendment made
September 2025	Michelle Ridsdale	Implementation of Privacy Notice specifically for job applicants

## **Table of Contents**

<b>1</b> .	Introduction	2
2.	The personal data we collect, hold and share include:	3
3.	Why we use this data	3
3.1	Use of your personal data in automated decision making and profiling	3
3.2	Use of your personal data for marketing purposes	3
3.3	Use of your personal data for filtering and monitoring purposes	4
4.	Our lawful basis for using this information	4
4.1	Our basis for using special category data	4
5.	Collecting this information	5
6.	How we store this data	5
<i>7</i> .	Who we share your information with	5
8.	Transferring data internationally	6
9.	Your Rights – personal information that we hold about you	6
10.	Other rights regarding your data	6
11.	Complaints	6
12.	Contact us	7

#### 1. Introduction

Under UK data protection law, individuals have a right to be informed about how Forward As One CE MAT, or any of its schools, uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how the Trust and each of our schools, collects and hold personal information relating to individuals applying for a job role within the Trust, or any of its schools .

This Privacy Notice applies to all personal data held by the MAT and its schools.

For the Trust: Forward As One CE MAT (Newnham Street, Bolton BL1 8QA) is the 'data controller' for the purposes of UK data protection law.

We will comply with the data protection law and principles, which means that your data will be:

- Used lawfully, fairly and in a transparent way
- Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes
- Relevant to the purposes we have told you about and limited only to those purposes

- Accurate and kept up to date
- Kept only as long as necessary for the purposes we have told you about
- Kept securely

Our data protection officer is Mrs. Michelle Ridsdale (see 'Contact us' below).

## 2. The personal data we collect, hold and share include:

Personal data that we may collect, use, store, and share (when appropriate) about you includes, but is not restricted to:

- Your personal information such as your name and contact details
- Employment details and/or professional details
- References
- Evidence of qualifications
- Employment details
- Photographs and CCV images captured as part of the identification and security procedures at our school premises
- Safeguarding information

We may also collect, use, store, and share (when appropriate) information about your child that falls into "special categories" of more sensitive personal data. This includes, but is not restricted to, information about:

- Details which may fall under 'protected characteristics'.
- Information about your health conditions, disabilities, or other medical information for example where you have provided this information to facilitate access arrangements or catering provision.
- Disclosure and Barring Service (DBS) information, where appropriate, to comply with safeguarding requirements.

## 3. Why we use this data

We use the data listed above to:

- Facilitate safer recruitment, as part of our safeguarding obligations
- Undertake equalities monitoring
- Get in touch with you
- Stay in touch in future, for example alumni communications
- Facilitate visits to our premises
- Identify you whilst in our premises

#### 3.1 Use of your personal data in automated decision making and profiling

We do not currently process your personal information through any automated decision making or profiling process. This means we don't make any decisions about you using only computers without any human involvement. If this changes in future, we will amend any relevant privacy notices to explain the processing to you, including your right to object to it.

## 3.2 Use of your personal data for marketing purposes

Where you have given, us consent to do so, we may send you messages by email or text promoting Trust / school events, campaigns, charitable causes, or services that may be of interest to you.

You can withdraw consent or 'opt out' of receiving these emails and/or texts at any time by clicking on the 'Unsubscribe' link at the bottom of any such communication, or by contacting us (see 'Contact us' below).

#### 3.3 Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. Safeguarding and Child protection) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s)
- Protect your welfare

# 4. Our lawful basis for using this information

- a. We only collect and use your personal data when the law allows us to. The Trust needs to establish a lawful basis to do this as set out in data protection law.
- b. Our lawful bases for processing your personal information are typically:
  - We need to comply with a legal obligation this means that we need to process the data to meet our responsibilities under law.
  - We need it to perform a task in the public interest this means we need to use your data to fulfil our official functions in our schools and as an educational Trust.
  - You have given us specific and explicit consent to use it in a certain way.
  - We need to protect your vital interests (or someone else's interests) for example in a medical emergency.
  - We have legitimate interests in processing the data where there is minimal privacy impact and we have a compelling reason to do so.
- c. Where you have provided us with your consent to use your information, you may take back this consent at any time. We will make this clear when requesting your consent and will explain how you would go about withdrawing your consent, in which case, the information about you will no longer be collected or processed.

## 4.1 Our basis for using special category data

Special categories of personal data will normally only be processed under the following legal grounds ('special category' information includes information about a person's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, physical or mental health or condition or sexual life, or genetic or Biometric Data):

- We need to process the information for reasons of substantial public interest in complying with legal obligations, for example, for the purposes of equality of opportunity and treatment.
- We are legally obliged to collect and use it in relation to employment, social security, or social protection
- We need to protect you or someone else, for example providing your medical information to the emergency services where there is a medical emergency.
- We have obtained specific and explicit consent to use your information in a certain way.
- We intend to use it to make or defend legal claims.
- We need to process it for public health reasons, and the processing is done by, or under the direction of, a health professional or by any other person obliged to confidentiality under law.
- We need to process it for archiving or for statistical purposes, and the processing is in the public interest.

For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law. Conditions include:

- We have obtained your consent to use it in a specific way.
- We need to protect an individual's vital interests (i.e., protect your life or someone else's life), in situations where you're physically or legally incapable of giving consent.

- The data concerned has already been made manifestly public by you.
- We need to process it for, or in connection with, legal proceedings, to obtain legal advice, or for the establishment, exercise or defence of legal rights.
- We need to process it for reasons of substantial public interest as defined in legislation.

# 5. Collecting this information

- a. While in most cases you must provide the personal information we need to collect, there are some occasions where you can choose whether or not to provide the data.
- b. We will always tell you if you have a choice. If you must provide the data, we will explain what might happen if you don't.
- c. Most of the data we hold about you will come from you, but we may also hold data about you from:
  - Local authorities
  - Government departments or agencies
  - Police forces, courts, tribunals
  - Medical professionals
  - Your representatives
  - Your family members
  - Your employer

#### 6. How we store this data

- a. We keep personal information about you during our contact with you. We may keep it after our contact has ended, if this is necessary.
- b. We have a Data Retention Schedule which explains how long we must keep certain categories of information.
- c. We have security measures in place to prevent your personal information from being accidently lost, used, or accessed in an unauthorised way, altered or disclosed.
- d. We will dispose of your personal data securely when we no longer need it.

# 7. Who we share your information with

- a. We do not share information about you with anyone outside of the Trust without permission from you unless the law and our policies allow us to do so.
- b. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with others such as:
  - Your family for example where we need to protect your vital interests in the case of an emergency.
  - Your representatives for example where you have a representative acting on your behalf.
  - Local authorities to meet our obligations to share certain information with it, such as safeguarding concerns.
  - Government bodies such as Department for Education (DfE) to meet our legal obligations and acting in the public interest regarding the education of young people.
  - Our regulator, Ofsted, to comply with our legal obligations and in the public interest to provide education services.
  - Police forces, Courts and Tribunals fulfilling our legal obligations to prevent crime, assist investigations or comply with court orders etc.
  - Our suppliers and service providers such as catering services, security services, IT services, software and online applications, payment providers to enable them to provide the service we have engaged them for in line with our contractual obligations.
  - The Trust's auditors to meet our legal obligations of having internal and external audits.
  - Health authorities such as the NHS to protect your vital interests.
  - Professional advisors and consultants acting under the public interest in providing educational support and consultancy.

# 8. Transferring data internationally

Where we transfer personal data to a country or territory internationally, we will do so in accordance with UK Data Protection Law

# 9. Your Rights – personal information that we hold about you

- a. You have the right to make a 'subject access request' to gain access to personal information that we hold about you.
- b. If you make a subject access request, and if we do hold information about you, we will (unless there is a good reason why we shouldn't)
  - Give you a description of it.
  - Tell you why we are holding and processing it, and how long we will keep it for.
  - Explain where we got it from, if not from you.
  - Tell you who it has been, or will be, shared with.
  - Let you know whether any automated decision-making is being applied to the data (decisions made by a computer or machine, rather than by a person), and any consequences of this.
  - Give you a copy of the information in a form you can understand.
- c. You may have the right for your personal information to be shared electronically with another organisation in certain circumstances.
- d. If you would like to make a request, please contact us (see "Contact Us" below). You can also read the information set out in the Trust's Data Protection Policy and the Subject Access guidance on our school websites where you will find a Subject Access Request Form. You are not required to use the form, but by doing so, it helps us to deal with your request more efficiently.

#### 10. Other rights regarding your data

- a. Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe, including the right to:
  - · object to the use of your personal data if it would cause, or is causing, damage or distress
  - stop it being used to send direct marketing
  - object to decisions being taken by automated means (by a computer or machine rather than by a person)
  - have the personal data we hold about you rectified if it is inaccurate or incomplete
  - restrict our processing of your personal data (i.e. permitting its storage but no further processing)
  - seek redress, either through the Information Commissioner's Office or through the Courts.
- b. To exercise these rights, please contact us (see "Contact us" below).

#### 11. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- > Report a concern online at <a href="https://ico.org.uk/make-a-complaint/">https://ico.org.uk/make-a-complaint/</a>
- > Call 0303 123 1113
- > Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## 12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact our **data protection officer**:

- Data protection Officer: Michelle Ridsdale
- Email address: <u>ridsdalem@fa1.uk</u>
- Address: Data Protection Officer, Forward As One CE MAT, c/o St. Paul's CE Primary School, Newnham Street, Astley Bridge, Bolton, BL1 8QA