

Privacy Notice for Prospective Employees

Privacy notice – how the school uses prospective employee information

About Us

This privacy notice explains how Keystone Academy Trust (the trust) collect, use, share and retain personal data about individuals who apply to work for Keystone Academy Trust, including unsuccessful candidates and speculative applicants. This notice is provided in accordance with Articles 13 and 14 of the UK GDPR.

Keystone Academy Trust is the data controller for the personal data processed during recruitment. The Chief Executive Officer (CEO) is responsible for data protection compliance on behalf of the Trust.

Data Controller

Keystone Academy Trust
Westbourne Park, Bourne, Lincs. PE10 9QS
Website: www.keystoneacademytrust.org.uk

Data Protection Officer (DPO)

Joe Lee
Ark ICT Solutions
Email: DPO@ark.me.uk

What personal data do we collect?

The personal data we will collect includes:

- name, address, telephone number and email address
- date of birth
- National Insurance number
- employment history and experience
- qualifications and training records
- reference details and reference information
- identification documents
- results of psychometric or assessment testing, where applicable

We may process special category and criminal offence data relating to:

- race or ethnicity
- religious or philosophical beliefs
- sexual orientation
- trade union membership
- physical or mental health

Where we process special category data during recruitment, we do so only where it is necessary and lawful. This includes processing that is necessary for the purposes of carrying out our obligations and exercising specific rights in the field of employment (Article 9(2)(b) UK GDPR), and processing necessary for reasons of substantial public interest such as safeguarding of children and individuals at risk (Article 9(2)(g) UK GDPR), as authorised by domestic law, including relevant conditions in Schedule 1 to the Data Protection Act 2018.

Information relating to criminal convictions, offences and related security measures (including DBS information) is processed in accordance with Article 10 UK GDPR. This processing is carried out only where it is authorised by domestic law providing appropriate safeguards, including relevant conditions in Schedule 1 of the Data Protection Act 2018, and only where necessary for safeguarding and employment suitability purposes.

Why do we collect your personal data?

It is necessary for us to collect and process personal data about you in order to assess your eligibility to work with us and to make a decision about your recruitment and employment although we do not make recruitment decisions based solely on automated processing (including profiling) which produces legal effects concerning you or similarly significantly affects you. More specifically, this will include but is not limited to the following:

- assessing skills, qualifications and suitability for a role
- carrying out safer recruitment checks, including references and vetting
- communicating with candidates during the recruitment process
- maintaining accurate recruitment records
- complying with legal and regulatory obligations, including safeguarding and right-to-work checks
- establishing, exercising or defending legal claims

We will not collect any personal data that we do not need and as far as is reasonable and practicable will ensure that the information recorded is accurate and kept up to date.

Lawful Bases for Processing

We process recruitment data under the following lawful bases:

- Legal obligation and public task - (Article 6(1)(c) UK GDPR), including employment law, safeguarding duties and right-to-work checks. Keeping Children Safe in Education (updated annually)
- Legitimate interests - (Article 6(1)(f) UK GDPR), to manage recruitment, assess suitability and retain recruitment records, where those interests are not overridden by your rights.

How do we collect your information?

This information is collected in the following ways:

- directly from you via application forms on My New Term and interviews
- from referees you nominate
- from background checks, including limited online searches which may include social media platforms relevant to recruitment suitability

In the unlikely event data about you is obtained from third parties prior to your application on My New Term, this privacy information will be provided to you within one month, unless a legal exemption applies.

How do we keep your data safe?

We have a Data Protection Policy which sets out how we aim to keep your personal data secure. The policy can be found on the trust's website www.keystoneacademytrust.org.uk.

Relevant information may be held on secure online systems used by the trust for example My New Term. We apply appropriate technical and organisational measures, including role-based access controls and staff training.

Personal data is not transferred or processed outside the UK or EEA.

Who do we share your data with?

We will only share information when it is necessary to do so for the purpose of recruitment and in accordance with the law. Where necessary, we will share your data with organisations that deliver services on behalf of the trust.

We may share personal data with:

- the Disclosure and Barring Service, for safeguarding checks
- occupational health providers, to assess fitness for work
- previous employers and referees
- professional advisers supporting recruitment

All recipients are required to process data lawfully and securely.

Why do we share your information?

We share personal information where this is necessary to comply with our legal obligations, fulfil our statutory duties, to safeguard children, or where it is otherwise permitted under data protection law. This processing does not generally rely on consent. Where consent is required for a specific, limited purpose, this will be made clear at the point of collection.

How long do we keep your data for?

We are required to retain your personal data only for as long as is necessary, after which it will be securely destroyed in line with the trust's Records Management Policy which you can find on our website www.keystoneacademytrust.org.uk.

- Recruitment data for unsuccessful candidates is retained for 6 months after the recruitment process ends
- For successful candidates, recruitment data forms part of the personnel file and is retained for the duration of employment in line with the Trust's Records Management Policy

Your Rights

You have specific rights to the processing of your data; these are the right to:

- access your personal data
- rectification of inaccurate data
- erasure, in certain circumstances
- restriction of processing
- object to processing based on legitimate interests. If you object, we will consider your objection and will stop that processing unless we can demonstrate compelling legitimate grounds which override your interests, rights and freedoms, or the processing is for the establishment, exercise or defence of legal claims.
- data portability, where applicable
- not be subject to solely automated decision-making

Where we rely on consent for a specific, limited purpose, you have the right to withdraw your consent at any time. Where we rely on legal obligation or public task, withdrawal of consent will not apply.

To exercise any of your rights please contact the schools Data Protection Officer, contact details below.

Further Information

If you wish to make a request or make a complaint about how we have handled your personal data please contact:

- Joe Lee, Ark ICT Solutions, Data Protection Officer, DPO@ark.me.uk
- Email: tracey.roscher@keystonemat.org

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law you can complain to the Information Commissioner's Office (ICO)
www.ico.org.uk