



NPAT RECRUITMENT PRIVACY NOTICE

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1. INTRODUCTION

We are Northampton Primary Academy Trust. As part of your application to join us or one of our schools, we will gather and use information relating to you. Information that we hold in relation to individuals is known as their “**personal data**”. This will include data that we obtain from you directly and data about you that we obtain from other people and organisations.

We might also need to continue to hold an individual’s personal data for a period of time after the recruitment process, even if you are unsuccessful. We retain records for a period of 6 months after the appointment of the successful candidate. Anything that we do with an individual’s personal data is known as “processing”.

This privacy notice sets out what personal data we will gather and hold about individuals who apply for a position with us, why we process that data, who we share this information with, and your rights in relation to your personal data processed by us.

Northampton Primary Academy Trust ‘The Trust’ is the ‘**data controller**’ for the purposes of UK data protection law.

Our Data Protection Officer, Angela Corbyn, is contactable by email at: DPO@npatschools.org

2. THE PERSONAL DATA WE HOLD

We may collect, hold, share and otherwise use the following information about you during your application process.

Up to and including shortlisting stage:

- your name and contact details (i.e. address, home and mobile phone numbers, email address);
- details of your qualifications, training, experience, duties, employment history (including job titles, salary, relevant dates and working hours), details of driving licence (if relevant for role), membership of professional bodies and interests;
- details of your referees;
- whether you are related to any member of our workforce; and
- details of any support or assistance you may need to assist you at the interview because of a disability.
- Photographs and CCTV images captured in school/on site

Following shortlisting stage, and prior to making a final decision

- information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;*
- confirmation of your academic and professional qualifications (including seeing a copy of certificates);*
- information via the DBS process, regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs), whether you are barred from working in regulated activity;*
- your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;*
- Copies of right to work documentation
- medical check to indicate fitness to work;*
- a copy of your driving licence (or other appropriate documentation as listed on the Home Office list);*
- if you are a teacher, we will check the National College of Teaching and Leadership (“NCTL”) or replacement organisation, Teachers Services about your teacher status, whether you are subject to a prohibition from teaching order and any other relevant checks (for example Section 128 direction for management posts and EEA teacher sanctions);* and
- equal opportunities monitoring data.

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked (*) above to us to enable us to verify your right to work and suitability for the position. Without providing us with this information, or if the information is not satisfactory, then we will not be able to proceed with any offer of employment.

If you are employed by us, the information we collect may be included on our Single Central Record. In this scenario, a further privacy notice in relation to data we collect, process, hold and share about you during your time with us, will be issued to you.

We may also collect, use, store and share (when appropriate) information about you that falls into ‘Special categories’ of more sensitive personal data . This includes but is not restricted to;

- Information about race, ethnicity, religious beliefs, sexual orientation and political opinions
- Information about disability and access requirements

We may also collect, use, store and share (when appropriate) information about criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

Depending on the position that you have applied for, we may collect this information from you, your referees (details of whom you will have provided), your education provider, any relevant professional body, the Disclosure and Barring Service (DBS), NCTL and the Home Office, during the recruitment process.

3. WHERE DO WE GET INFORMATION FROM ABOUT YOU?

A lot of the information we have about a job applicant comes from the individuals themselves. Whilst the majority of information you provide to us is mandatory, there is some information that can be provided voluntarily. In order to comply with UK GDPR, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this.

4. WHY WE USE THIS DATA

We will process your personal data during your application process for the purpose of complying with legal obligations, carrying out tasks which are in the public interest, and taking steps with a view to entering into an employment contract with you. This includes:

- to assess your suitability for the role you are applying for including relevant experience and qualifications;
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- to take steps to enter into a contract with you;
- to check that you are eligible to work in the United Kingdom or that you are not prohibited from teaching; and
- so that we are able to monitor applications for posts in the [Trust/Academy/School] to ensure that we are fulfilling our obligations under the public sector equality duty under the Equality Act 2010.
- To ensure that appropriate access arrangements can be provided for candidates that require them.

5. WHY WE USE SPECIAL CATEGORY DATA

For 'special category' data, we only collect and use it when we have both a lawful basis, as set out above, and 1 of the following conditions for processing as set out in UK data protection law:

- We have obtained your explicit consent to use your personal data in a certain way
- We need to perform or exercise an obligation or right in relation to employment, social security or social protection law
- 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 the establishment, exercise or defence of legal claims
- We need to process it for reasons of substantial public interest as defined in legislation
- We need to process it for health or social care purposes, and the processing is done by, or under the direction of, a health or social work professional or by any other person obliged to confidentiality under law
- 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 purposes, scientific or historical research purposes, 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

6. USE OF YOUR PERSONAL DATA FOR MARKETING PURPOSES

We do not share your personal data for marketing purposes, unless where you have given us consent to do so.

7. USE OF YOUR PERSONAL DATA IN AUTOMATED DECISION MAKING AND PROFILING

We do not currently process any job applicant personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices in order to explain the processing to you, including your right to object to it.

8. HOW WE STORE THIS DATA

We will hold information relating to your application only for as long as necessary. If you are successful then how long we need to hold on to any information will depend on Our record retention schedule within the NPAT Records Management Policy sets out how long we keep information about job applicants.

If you are unsuccessful we will hold your personal data only for six months, after which time it is securely deleted.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it

9. WHO WE SHARE DATA WITH

We will not share information gathered during your application process with third parties, other than professional advisors such as legal as HR advisors or platforms used to process job applications.

10. TRANSFERRING DATA INTERNATIONALLY

Where we transfer personal data to a country or territory outside the UK, we will do so in accordance with UK data protection law.

11. YOUR RIGHTS

You have the right to request access to personal data that we hold about you, subject to a number of exceptions. To make a request for access to your personal data, you should contact: dpo@npatschools.org

Please also refer to our Subject Access Request Policy, available on the Trust website, for further details on making requests for access to your personal data.

You also have the following rights:

- the right to be informed about the collection and use of your personal data – this is called ‘right to be informed’.
- the right to ask us to change any information you think is not accurate or complete – this is called ‘right to rectification’.
- the right to ask us to delete your personal information – this is called ‘right to erasure’
- the right to ask us to stop using your information – this is called ‘right to restriction of processing’.
- the ‘right to object to processing’ of your information, in certain circumstances
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commissioner if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don’t have the right to object, but you have the right to withdraw consent.
- 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 or directly to the Information Commissioner’s Office at raise a concern with ICO.

- For further information on how to request access to personal information held centrally by the Department for Education (DfE), please see the 'How Government uses your data' section of this notice.

If you want to exercise any of these rights then you should contact dpo@npatschools.org

The law does not oblige the Trust to comply with all requests. If the Trust does not intend to comply with the request then you will be notified of the reasons why in writing.

12. CONCERNS

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.

Please contact: Data Protection Officer – email: dpo@npatschools.org

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

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