

Privacy notice for job applicants

Kings Academy Trust

**Effective from**

1 September 2026

Next review

September 2027, or earlier if processing changes

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1. Introduction

This privacy notice explains how Kings Academy Trust collects and uses personal information about people applying for employment, work placements or other roles with the Trust. It applies across the Trust and its academies unless a more specific notice is provided at the point of collection.

Kings Academy Trust is the data controller. We process personal information under the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and the Data (Use and Access) Act 2025.

The Trust's Data Protection Officer is Satswana and can be contacted at admin@satswana.com.

2. Personal information we use

- identity and contact details and information contained in application forms, CVs and covering letters
- employment history, references, qualifications, professional memberships and evidence of suitability for the role
- right-to-work, identity and, where applicable, teaching-status, prohibition, DBS, barred-list and overseas-check information
- interview, assessment, shortlisting, selection and correspondence records
- salary expectations, availability, reasonable adjustments and relevant health information
- equality-monitoring information where provided
- publicly available online information reviewed for shortlisted candidates in accordance with safer-recruitment guidance
- photographs, CCTV and visitor records created when attending Trust premises.

3. Why we use it

- administer applications and communicate with candidates
- assess qualifications, experience and suitability and make recruitment decisions
- make reasonable adjustments and monitor equality of opportunity
- carry out identity, right-to-work, safeguarding and safer-recruitment checks
- maintain records, respond to challenges and establish or defend legal claims
- protect pupils, staff, candidates and Trust premises.

4. Lawful bases

- Article 6(1)(b), contract: taking steps at your request before entering into an employment or engagement contract
- Article 6(1)(c), legal obligation: right-to-work, equality, safeguarding and employment-law requirements
- Article 6(1)(e), public task: safer recruitment and safeguarding processing necessary for the Trust's education functions
- Article 6(1)(f), legitimate interests: recruitment administration, fraud prevention, organisational security and defending legal claims where this is not an official public task and your rights do not override the interest
- Article 6(1)(d), vital interests: responding to a life-threatening emergency
- Article 6(1)(a), consent: genuinely optional processing such as joining a future-vacancies list. Consent is not used where another basis is necessary for recruitment.

5. Special category and criminal offence data

Some information needs additional protection under data protection law. The special category data we may use includes:

- health, disability and reasonable-adjustment information
- racial or ethnic origin, religious or philosophical beliefs, sexual orientation and other equality-monitoring information.

We use this information only where it is necessary for the purposes described in this notice and where we have both an Article 6 lawful basis and an Article 9 condition. Depending on the purpose, the Article 9 conditions we rely on are:

- Article 9(2)(b): employment and social-protection obligations and rights

- Article 9(2)(f): establishing, exercising or defending legal claims
- Article 9(2)(g): substantial public interest, including equality monitoring and safeguarding where an applicable DPA 2018 Schedule 1 condition is met
- Article 9(2)(h): occupational-health assessment subject to the required safeguards
- Article 9(2)(a): explicit consent, only where appropriate and freely given.

Photographs and ordinary CCTV images are personal data but are not automatically special category data. They become biometric special category data only if they are technically processed to uniquely identify a person.

Where we use information about criminal convictions or offences, including relevant DBS information, we do so under Article 10 UK GDPR and an applicable condition in Schedule 1 of the Data Protection Act 2018. This will normally relate to employment, safeguarding, preventing fraud or protecting children and other vulnerable people. Where required, the Trust maintains an Appropriate Policy Document.

6. How we collect information

We collect information from you through applications, correspondence, interviews, assessments and pre-employment checks. We will explain whether information is mandatory and the consequences of not providing it. If information needed to assess or lawfully appoint you is not provided, we may be unable to progress the application.

We may also receive information from referees, previous employers, recruitment agencies or platforms, the Disclosure and Barring Service, Teaching Regulation Agency, Home Office or other right-to-work services, occupational-health providers, local authorities, police, professional bodies and publicly available online sources.

Online searches

As part of safer recruitment, we may conduct a proportionate search of publicly available online information about shortlisted candidates. Its purpose is to identify issues relevant to suitability to work with children or in a school environment that may need to be explored at interview. It is not used to search for protected characteristics or irrelevant private-life information.

7. Retention and security

If you are appointed, relevant recruitment information becomes part of your workforce record. If you are not appointed, we retain recruitment information only for the period specified in the Data Retention Schedule.

The exact period depends on the type of record. We apply the Trust's Data Retention Schedule, taking account of statutory record-keeping duties, safeguarding requirements, financial and audit rules, limitation periods, regulatory guidance and whether information is needed to establish, exercise or defend legal claims. The period is determined by recruitment audit needs, safeguarding obligations, limitation periods, equality monitoring and whether a dispute or legal claim is reasonably anticipated.

We use appropriate technical and organisational measures to protect personal information against accidental loss, unauthorised access, alteration or disclosure. Access is limited to people who need the information for their role. Information is securely deleted or destroyed when it is no longer required.

A copy of the relevant retention schedule or further information about a particular retention period is available from the Data Protection Officer.

8. Sharing and international transfers

Access is limited to staff and panel members involved in recruitment. Where necessary and lawful, we may also share information with recruitment service providers, referees, occupational-health providers, the Disclosure and Barring Service, Teaching Regulation Agency, Home Office or other right-to-work services, local authorities, safeguarding bodies, professional advisers, insurers, courts and law-enforcement bodies.

International transfers

Some service providers may store or allow access to personal information outside the UK. Before making a restricted transfer, we check that UK adequacy regulations apply, or put in place an appropriate safeguard such as the UK International Data Transfer Agreement or UK Addendum and complete the required data

protection test. We use an Article 49 exception only where the law permits. Contact the Data Protection Officer for information about the safeguard used for a particular service.

9. Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- be informed about how we use your personal information
- ask for access to the personal information we hold about you
- ask us to correct inaccurate or incomplete information
- ask us to erase information or restrict its use in certain circumstances
- object to processing in certain circumstances, including direct marketing
- receive information in a portable format where the right to data portability applies
- withdraw consent at any time where consent is our lawful basis, without affecting earlier lawful processing
- ask for safeguards and human involvement where a significant decision is made solely by automated means
- complain to us and to the Information Commissioner's Office.

These rights are not absolute. For example, erasure does not normally apply where we must keep information to comply with a legal obligation or perform a public task. We will explain any restriction that applies when responding to a request.

To exercise a right, contact the Data Protection Officer or the Trust's Data Protection Lead using the details in section 12. We may ask for information needed to confirm identity and locate the relevant records.

10. Automated decision-making and profiling

The Trust does not currently make decisions about you based solely on automated processing where the decision has a legal or similarly significant effect. Digital and artificial-intelligence tools may support administrative work, but accountable staff remain responsible for significant decisions.

If this changes, we will update the relevant privacy information before the processing begins and explain the logic involved, likely effects and safeguards, including how to obtain human intervention and challenge a decision.

11. Data protection complaints

You can make a data protection complaint by emailing admin@satswana.com or ddonnelly@kingsacademytrust.co.uk, or by writing to the Trust at the address in section 12. Please describe the issue and the outcome you are seeking.

We will acknowledge receipt within 30 days. Without undue delay, we will make appropriate enquiries, keep you informed where an investigation is continuing, and tell you the outcome and any action taken.

You may also complain to the Information Commissioner's Office. The ICO can be contacted on 0303 123 1113 or through <https://ico.org.uk/make-a-complaint/>. The ICO's postal address is Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

12. Contact us

Kings Academy Trust, City Approach 1, Albert Street, Eccles, M30 0BG

Data Protection Officer: Satswana — admin@satswana.com

Data Protection Lead: David Donnelly — ddonnelly@kingsacademytrust.co.uk