

Three Counties Academy Trust



Privacy Statement – Job Applicants Data – FI12(F)

Three Counties Academy Trust (TCAT)

Effective Date: Academic year 2026-2027

Last Reviewed: June 26th, 2026

1. Introduction

Three Counties Academy Trust, commonly referred to as TCAT, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **job applicants** data across all schools within TCAT in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data held by our schools unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

2. What Data We Collect

We collect, store, and process the following categories of job applicants data:

- **Personal Information** – Name, title, date of birth, and gender
- **Contact Information** – Home address, email address, phone numbers
- **Employment and Professional Background** – CVs, cover letters, application forms, employment history, references, qualifications, and training records
- **Right to Work Information** – Passport details, visa documentation, and other legal right-to-work evidence
- **Financial Information** – Bank details (if reimbursement for interview expenses is provided)
- **Criminal Record Checks** – Disclosure and Barring Service (DBS) checks, where applicable
- **Medical and Health Information** – Where relevant for reasonable adjustments or fitness to work assessments
- **Correspondence and Interview Records** – Emails, notes from interviews, assessments, and recruitment decisions
- **Equal Opportunities Monitoring** – Information on ethnicity, disability, gender, and other protected characteristics (collected voluntarily and anonymised where possible)
- **Photographs and Video** – If required for identification during the recruitment process
- **CCTV Footage** – If applicants visit TCAT schools where CCTV is in operation

3. Why We Collect and Use job applicants Data

We process job applicants data under the following lawful bases as defined under UK GDPR:

- **Legal Obligation (Article 6(1)(c))** – To comply with employment law, safeguarding, and right-to-work regulations
- **Public Task (Article 6(1)(e))** – To assess applications for roles within the education sector in the public interest
- **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for the Trust's recruitment process, balanced against individual rights
- **Consent (Article 6(1)(a))** – For specific activities such as equal opportunities monitoring and interview recordings

Additionally, we may process **special category data** (e.g., health, ethnicity, and SEND data) under **Article 9(2)(b) and (g) UK GDPR**, as processing is necessary for reasons of substantial public interest, safeguarding, or legal obligations.

4. How We Use job applicants Data

We use job applicants data for the following purposes:

- To assess candidates' suitability for employment within TCAT
- To conduct pre-employment checks, including references and DBS checks where applicable
- To verify right-to-work status and ensure compliance with immigration laws
- To contact applicants regarding the recruitment process
- To arrange and conduct interviews and assessments
- To process interview expenses where applicable
- To ensure equal opportunities and diversity monitoring (collected anonymously where possible) To comply with safeguarding and child protection requirements
- To respond to queries and disputes related to the recruitment process

5. How We Store and Protect job applicants Data

We take the security of job applicants data seriously and implement the following measures:

- **Physical Security** – Secure storage of paper records in locked areas
- **Technical Security** – Encryption, password-protected systems, secure cloud storage
- **Organisational Measures** – Staff training, data protection policies, regular audits to ensure compliance

We only retain job applicants data for as long as necessary in line with our **Records Management Policy**, which follows guidance from the **Information and Records Management Society (IRMS) Schools Toolkit**.

- Unsuccessful application data will be retained for **six months** after the recruitment process ends unless a longer retention period is required for legal reasons
- Successful applicants' data will be transferred to their **staff personnel file** and retained in accordance with the **Staff Privacy Notice**

6. Who We Share job applicants Data With

We only share job applicants data when it is lawful and necessary, including with:

- **Disclosure and Barring Service (DBS)** – For safeguarding and background checks
- **Local Authorities** – For safeguarding and employment checks where applicable
- **Department for Education (DfE)** – Where required for compliance with education sector regulations
- **Educational and Professional References** – To verify employment and qualifications
- **Law Enforcement Agencies** – If required for legal compliance or safeguarding concerns
- **Occupational Health Services** – For medical and workplace adjustment assessments where necessary

All third parties we share data with must comply with strict data protection agreements.

7. International Data Transfers

We do not routinely transfer job applicants data outside the UK. If we do, we ensure appropriate safeguards are in place, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

8. Job applicants Rights

Under UK GDPR, job applicants have the following rights regarding personal data:

- **Right to Be Informed** – About how we use their data
- **Right of Access** – To request a copy of their personal data
- **Right to Rectification** – To correct inaccurate or incomplete data
- **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request data deletion
- **Right to Restrict Processing** – To limit how data is used
- **Right to Data Portability** – To request data in a transferable format (where applicable)
- **Right to Object** – To processing based on legitimate interests
- **Rights Related to Automated Decision-Making** – We do not use job applicants data for automated decisions

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

9. Contact Details

For any questions about this privacy statement or to exercise your rights, please contact:

N Cook Data Protection Officer

on behalf of Three Counties Academy Trust

Schools DPO, c/o PSB jubilee House, Townsend Lane, London, NW9 8TZ

Email: nicola@schoolsdpdpo.com

Tel: 01296 658502

If you have concerns about how your data is handled, you can also contact the **Information Commissioner's Office (ICO)**:

ICO Website: www.ico.org.uk

ICO Helpline: 0303 123 1113

10. Changes to This Privacy Statement

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.