



**Central Region  
Schools Trust**

*Founded by the RSA*

## PRIVACY NOTICES

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**Recommended by:**

COO

**Ratified by:**

**Audit & Risk Committee**

**Signed:**

**Position on the Board:**

Chair to A&R Committee

**Ratification Date**

**13.03.2024**

**Next Review:**

Spring Term 2026

**Policy.Tier  
(Central/Hub/School):**

Central

### **Key Changes in this Edition**

|                                                                                  |
|----------------------------------------------------------------------------------|
| Reworded privacy notice introductions and removed reference to Internal Auditor. |
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| Updated contact information to remove reference to Internal Auditor. |
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# Privacy Notice for Parents/Carers

At the Central Region Schools Trust (the Trust), we are committed to protecting the privacy and data of our students. This Privacy Notice explains how we collect, store, and use personal data about pupils.

The Trust is the 'data controller' for the purposes of data protection law, and each school's Principal/Head of School is responsible for ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018). Our Data Protection Officer (DPO) oversees data protection compliance.

## **The personal data we hold**

The personal data that we may collect, use, store and share (where appropriate) about pupils includes, but is not restricted to:

- name, unique pupil number, address, date of birth, identification documents
- contact name, email address, telephone number, contact preferences
- results of internal assessments and externally set tests/exams
- pupil and curriculum records
- characteristics such as ethnicity, language, eligibility for free school meals
- behaviour and exclusion information
- details of any medical conditions, including physical and mental health, or special educational needs
- doctors' name and contact details
- attendance information such as sessions attended, number of absences and absence reasons
- safeguarding information
- details of any support received, including care packages, plans and support providers
- photographs and videos
- CCTV footage where used
- destination information including university attended and employment taken after leaving school
- social media and other online information

We may also hold data about pupils that we have received from other organisations, including other schools, local authorities and the Department for Education.

## **Why we collect and use this data**

We use this data to:

- support pupil learning
- monitor and report on pupil progress
- monitor and report on attendance for safeguarding compliance
- provide appropriate pastoral care
- protect pupil welfare
- assess the quality of our services
- administer admissions waiting lists
- carry out research
- comply with the law regarding data sharing
- support a young person in their transition to a post-16 provider of education or training

### **The lawful basis on which we use this information**

We only collect and use pupils' personal data when the law allows us to. Most commonly, we process it where:

- we need to comply with a legal obligation
- we need it to perform an official task in the public interest

Less commonly, we may also process pupils' personal data in situations where:

- we have obtained consent to use it in a certain way
- we need to protect the individual's vital interests (or someone else's interests)

Where we have obtained consent to use pupils' personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

Some of the reasons listed above for collecting and using pupils' personal data overlap, and there may be several grounds which justify our use of this data.

### **Collecting this information**

Whilst the majority of information we collect about pupils is mandatory, there is some information that can be provided voluntarily. In order to comply with the UK GDPR and DPA 2018, we will inform you whether you are required to provide certain pupil information to us or if you have a choice in this. If it is mandatory, we will explain the possible consequences of not complying.

### **How we store this data**

We keep personal information about pupils while they are attending our school. We may also keep it beyond their attendance at our school if this is necessary in order to comply with our legal obligations. This will be done in accordance with the Trust's Records Management Policy. Pupil personal information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

### **Data sharing**

We do not share information about pupils with any third party without consent unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with data protection law), we may share personal information about pupils with:

- other schools in the Central Region Schools Trust
- schools that the pupils attend after leaving us
- other education providers
- the schools' local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns and exclusion
- the Department for Education
- the pupil's family and representatives
- educators and examining bodies
- our regulators (eg Ofsted)
- suppliers and service providers – to enable them to provide the service we have contracted them for
- financial organisations

- central and local government
- our auditors
- survey and research organisations
- health authorities
- school nurse
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies

### **National Pupil Database**

We are required to provide information about pupils to the Department for Education as part of statutory data collections such as the school census. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about our pupils with the Department for Education under regulation 5 of the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the pupil information we share with the Department for Education, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform independent research, as well as studies commissioned by the Department of Education. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information>

The Department for Education may share information from the NPD with other organisations who promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

The Department for Education has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the Department for Education releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

For more information about the Department for Education's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education has provided pupil information, (and for which project), please visit the following website:

<https://www.gov.uk/government/publications/national-pupil-database-requests-received>

To contact the Department for Education: <https://www.gov.uk/contact-dfe>

### **Youth support services**

Once our pupils reach the age of 13, we are legally required to pass on certain information about them to their local authority and/or provider of youth support services, as they have legal responsibilities regarding the education or training of 13-19 year olds.

We may also share certain personal data relating to children aged 16 and over with their local authority and/or post-16 education and training providers in order to secure appropriate services for them.

This information enables it to provide youth support services, post-16 education and training services and careers advisers.

Parents/carers, or pupils once aged 16 or over, can contact our Data Protection Officer to request that we only pass the individual's name, address and date of birth to the local authority or post-16 education and training providers.

### **Transferring data internationally**

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

### **Parents and pupils' rights regarding personal data**

Under data protection legislation, individuals have a right to make a Subject Access Request to gain access to personal information that the Trust holds about them.

Parents/carers can make a request with respect to their child's data where the child is not considered mature enough to understand their rights over their own data (usually under the age of 12), or where the child has provided consent.

Parents/carers also have the right to make a Subject Access Request with respect to any personal data the Trust holds about them.

If you make a Subject Access Request, and if we do hold information about you or your child, we will:

- 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 or your child
- 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, and any consequences of this
- give you a copy of the information in an intelligible form

Individuals also have the right for their personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer.

### **Other rights**

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 personal data if it would cause, or is causing, damage or distress
- prevent 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)
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

### **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.

To make a complaint, please contact our Data Protection Officer.

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

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

### **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 via one of the methods below:

- Address: The Central Region Schools Trust, B.06 Assay Studios, 141-143 Newhall Street, Birmingham, B3 1SF
- Telephone number: 0121 270 3117
- Email: [dpo@crst.org](mailto:dpo@crst.org)

# Privacy Notice for Pupils

At the Central Region Schools Trust (the Trust), we are committed to protecting the privacy and data of our students. This Privacy Notice explains how we collect, store, and use personal data about pupils.

The Trust is the 'data controller' for the purposes of data protection law, and each school's Principal/Head of School is responsible for ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018). Our Data Protection Officer (DPO) oversees data protection compliance.

## **The personal data we hold**

We hold some personal information about you to make sure we can help you learn and look after you.

For the same reasons, we get information about you from some other places too – like other schools, the local council and the government.

This information includes:

- your name, unique pupil number, address, date of birth, identification documents
- the name of your contacts along with their email address, telephone number and contact preference
- your test results and assessment details
- details of any behaviour issues or exclusions
- your attendance records
- information to help keep you safe
- details of support you may need

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 information about (where applicable), but is not restricted to:

- your characteristics, like your ethnic background, language, if you have free school meals or any special educational needs
- any medical conditions you have
- photographs, videos and CCTV footage where used
- biometric data

## **Why we use this data**

We use this data to help run the Trust including to:

- get in touch with you and your parents/carers when we need to
- check how you are doing in lessons and exams
- work out whether you or your teachers need any extra help
- track how well the Trust and its schools as a whole are performing
- look after your wellbeing

## **Our legal basis for using this data**

We will only collect and use your information when the law allows us to. Most often, we will use your information where:

- we need to comply with the law
- we need to use it to carry out a task in the public interest (in order to provide you with an education)

Sometimes, we may also use your personal information where:

- you, or your parents/carers have given us permission to use it in a certain way
- we need to protect your interests (or someone else's interest)

Where we have got permission to use your data, you or your parents/carers may withdraw this at any time. We will make this clear when we ask for permission and explain how to go about withdrawing consent.

Some of the reasons listed above for collecting and using your information overlap, and there may be several grounds which mean we can use your data.

### **Collecting this information**

While in most cases you, or your parents/carers, must provide the personal information we need to collect, there are some occasions when you can choose whether or not to provide the data.

We will always tell you if it is optional. If you must provide the data, we will explain what might happen if you do not.

### **How we store this data**

We will keep personal information about you while you are a pupil in our Trust. We may also keep it after you have left the Trust where we are required to by law.

We have a Records Management Policy which sets out how long we must keep information about pupils.

Your information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

### **Data sharing**

We do not share personal information about you with anyone outside the Trust without permission from you or your parents/carers, unless the law and our policies allow us to do so.

Where it is legally required, or necessary for another reason allowed under data protection law, we may share personal information about you with:

- other schools in the Central Region Schools Trust
- schools that you go to after leaving us
- other education providers
- our local authority - to meet our legal duties to share certain information with it, such as concerns about pupils' safety and exclusions
- the Department for Education (a government department)
- your family and representatives
- educators and examining bodies
- our regulator (the organisation or 'watchdog' that supervises us) - Ofsted

- suppliers and service providers - so that they can provide the services we have contracted them for
- financial organisations
- central and local government
- our auditors
- survey and research organisations
- health authorities
- school nurse
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies

### **National Pupil Database**

We are required to provide information about you to the Department for Education as part of statutory data collections such as the school census. This data sharing underpins school funding and educational attainment policy and monitoring. We are required to share information about you with the Department for Education under regulation 5 of the Education (Information About Individual Pupils) (England) Regulations 2013.

To find out more about the pupil information we share with the department, for the purpose of data collections, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

Some of this information is then stored in the [National Pupil Database](#) (NPD), which is owned and managed by the Department for Education and provides evidence on school performance to inform independent research, as well as studies commissioned by the Department of Education. The database is held electronically so it can easily be turned into statistics. The information is securely collected from a range of sources including schools, local authorities and exam boards.

To find out more about the NPD, go to <https://www.gov.uk/government/publications/national-student-database-user-guide-and-supporting-information>

The Department for Education may share information from the NPD with other organisations who promote children's education or wellbeing in England. Such organisations must agree to strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

The Department for Education has robust processes in place to ensure the confidentiality of our data is maintained and there are stringent controls in place regarding access and use of the data. Decisions on whether the Department for Education releases data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested: and
- the arrangements in place to store and handle the data

For more information about the Department for Education's data sharing process, please visit:

<https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

For information about which organisations the Department for Education has provided pupil information, (and for which project), please visit the following website:

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To contact the Department for Education: <https://www.gov.uk/contact-dfe>

### **Youth support services**

Once you reach the age of 13, we are legally required to pass on certain information about you to your local authority and/or provider of youth support services, as they have legal responsibilities regarding the education or training of 13-19 year olds.

This information enables it to provide youth support services, post-16 education and training services, and careers advisers.

Your parents/carers, or you, once you are 16, can contact our Data Protection Officer to ask us to only pass your name, address and data of birth to the local authority or post-16 education and training providers.

### **Transferring data internationally**

Where we share data with an organisation that is based outside the UK, we will protect your data by following data protection law.

### **Your rights**

#### **How to access personal information we hold about you**

You can find out if we hold any personal information about you, and how we use it, by making a Subject Access Request, as long as we judge that you can properly understand your rights and what they mean.

If we do hold information about you, we will:

- give you a description of it
- tell you why we are holding and using it, and how long we will keep it for
- explain where we got it from, if not from you or your parents
- tell you who it has been, or will be, shared with
- let you know if we are using your data to make any automated decisions (decisions being taken by a computer or machine, rather than by a person)
- give you a copy of the information

You may also ask us to send your personal information to another organisation electronically in certain circumstances.

If you want to make a request, please contact our Data Protection Officer.

### **Your other rights over your data**

You have other rights over how your personal data is used and kept safe, including the right to:

- say that you do not want it to be used if this would cause, or is causing, harm or distress
- stop it being used to send you marketing materials

- say that you do not want it used to make automated decisions (decisions made by a computer or machine, rather than by a person)
- in certain circumstances, have it corrected, deleted or destroyed if it is wrong, or restrict our use of it
- claim compensation if the data protection rules are broken and this harms you in some way

### **Complaints**

We take any complaints about how we collect and use your personal data very seriously, so please let us know if you think we have done something wrong.

You can make a complaint at any time by contacting our Data Protection Officer.

You can also complain to the Information Commissioner's Office in one of the following ways:

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

### **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 via one of the methods below:

- Address: The Central Region Schools Trust, B.06 Assay Studios, 141-143 Newhall Street, Birmingham, B3 1SF
- Telephone number: 0121 270 3117
- Email: [dpo@crst.org](mailto:dpo@crst.org)

# Privacy Notice for Staff, Members, Trustees, Governors and Volunteers

Under data protection law, individuals have a right to be informed about how Central Region Schools Trust use any personal data that they hold about them. Central Region Schools Trust comply with this right by providing 'Privacy Notices' (sometimes called 'fair processing notices') to individuals where they are processing their personal data.

This Privacy Notice explains how we collect, store and use personal data about individuals we employ, or otherwise engage, to work at our schools.

The Trust is the 'data controller' for the purposes of data protection law, and each school's Principal/Head of School is responsible for ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018). Our Data Protection Officer (DPO) oversees data protection compliance.

## **The personal data we hold**

We process data relating to those we employ, or otherwise engage, to work at our schools. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- name and contact details
- date of birth, marital status and gender
- next of kin and emergency contact numbers
- salary, annual leave, pension and benefits information
- bank account details, payroll records, National Insurance number and tax status information
- recruitment information, including copies of right to work documentation, online checks, references and other information included in a CV or cover letter or as part of the application process
- qualifications and employment records, including work history, job titles, working hours, training records, professional memberships, and childcare disqualification declaration
- performance information
- outcomes of any disciplinary and/or grievance procedures
- absence data
- copy of driving licence and car details including registration number
- photographs and videos
- CCTV footage where used
- data about your use of the Trust's information and communications system

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable), but is not restricted to:

- race, ethnicity, religious beliefs, sexual orientation and political opinions
- trade union membership
- health, including any medical conditions, and sickness records
- genetic and biometric data

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.

### **Why we use this data**

The purpose of processing this data is to help us run the Trust, including to:

- enable you to be paid
- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- support effective performance management
- inform our recruitment and retention policies
- allow better financial modelling and planning
- enable ethnicity and disability monitoring
- improve the management of workforce data across the sector
- support the work of the School Teachers' Review Body

### **Our lawful basis for using the data**

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- fulfil a contract we have entered into with you
- comply with a legal obligation
- carry out a task in the public interest

Less commonly, we may also use personal information about you where:

- you have given us consent to use it in a certain way
- we need to protect your vital interests (or someone else's interests)

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the Trust's use of your data.

### **Our basis for using 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 one 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 need to perform or exercise an obligation or right in relation to employment, social security or social protection law
  - 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

### **Collecting this information**

While the majority of information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

We may also obtain information from tax and regulatory authorities such as HMRC, previous employers, your trade union, the Disclosure & Barring Service, other staff members, pupils or their parents, and publicly available resources including on-line services. In addition, we may obtain information from automated monitoring of our websites and other technical systems such as our computer networks and systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail and mobile phone records.

### **How we store this data**

We create and maintain an employment file for each staff member. The information contained in this file is kept secure and only used for purposes directly relevant to your employment.

Once your employment with us has ended, we will retain this file and delete the information in it in accordance with the Trust's Records Management Policy. Your information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

### **Data sharing**

We do not share information about you with any third party without your consent unless the law and our policies allow us to do so. Where it is legally required, or necessary (and it complies with data protection law) we may share personal information about you with:

- the relevant local authority to meet our legal obligations to share certain information with it, such as safeguarding concerns

- the Department for Education
- other schools in the Central Region Schools Trust
- your family or representatives
- educators and examining bodies
- our regulators (eg Ofsted)
- suppliers and service providers – to enable them to provide the service we have contracted them for, such as payroll
- financial organisations
- central and local government
- our auditors
- survey and research organisations
- trade unions and associations
- health authorities
- security organisations
- health and social welfare organisations
- professional advisers and consultants
- charities and voluntary organisations
- police forces, courts, tribunals
- professional bodies
- employment and recruitment agencies

### **Local authority**

We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

### **Department for Education**

We are required to share information about our staff with the Department for Education under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

The Department for Education collects and processes personal data relating to those employed by schools (including multi academy trusts) and local authorities that work in state funded schools (including all maintained schools, all academies and free schools and all special schools including Pupil Referral Units and Alternative Provision). All state funded schools are required to make a census submission because it is a statutory return under sections 113 and 114 of the Education Act 2005

To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>.

The Department for Education may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

The Department for Education has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether Department for Education releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

For more information about the Department for Education's data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>

To contact the Department for Education: <https://www.gov.uk/contact-dfe>

### **Transferring data internationally**

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

### **Your rights**

#### **How to access personal information we hold about you**

Individuals have a right to make a Subject Access Request to gain access to personal information that the Trust holds about them.

If you make a Subject Access Request, and if we do hold information about you, we will:

- 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, and any consequences of this
- give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer.

#### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress
- prevent your data being used to send direct marketing
- object to the use of your personal data for decisions being taken by automated means
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing

- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

### **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.

To make a complaint, please contact our Data Protection Officer, please see the contact details below.

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- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

### **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 via one of the methods below:

- Address: The Central Region Schools Trust, B.06 Assay Studios, 141-143 Newhall Street, Birmingham, B3 1SF
- Telephone number: 0121 270 3117
- Email: [dpo@crst.org](mailto:dpo@crst.org)

# Privacy Notice for Job Applicants

Under data protection law, individuals have a right to be informed about how Central Region Schools Trust use any personal data that they hold about them. Central Region Schools Trust comply with this right by providing 'Privacy Notices' (sometimes called 'fair processing notices') to individuals where they are processing their personal data.

This Privacy Notice explains how we collect, store and use personal data about individuals who apply to volunteer, otherwise engage or work at our schools.

Central Region Schools Trust (the Trust) are the 'data controller' for the purposes of data protection law. The Trust has delegated responsibility to the Principal/Head of School in each school for ensuring compliance with the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018).

The Trust, as part of the recruitment process 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. Anything that we do with an individual's personal data is known as "processing".

## **What information do we process during the application process?**

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

Up to and including shortlisting stage:

- 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; and
- whether you are related to any member of our workforce.

Following shortlisting stage, and prior to making a final decision:

- the online checks record;
- 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 interview and 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;\*
- 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 Department for Education's 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.

We may also collect, store and use information about you that falls into 'special categories' of more sensitive personal data. This includes information about (where applicable):

- your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs;
- details of any support or assistance you may need to assist you at the interview because of a disability.

If you are employed by us, a further privacy notice in relation to data we collect, process, hold and share about you during your time with us as a member, trustee, governor, volunteer or employee will be issued to you. The information we collect may be included on our Single Central Record.

#### **Our basis for using 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 one 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 need to perform or exercise an obligation or right in relation to employment, social security or social protection law
  - 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

### **Where do we get information from during your application process?**

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), the Department for Education and the Home Office, during the recruitment process.

### **Why do we use this information?**

We process your personal data during the 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;
- take steps to enter into a contract with you;
- check that you are eligible to work in the United Kingdom or that you are not prohibited from teaching; and
- monitor applications for posts in the Trust or one of our schools to ensure that we are fulfilling our obligations under the Equality Act 2010.

### **How long will we hold information in relation to your application?**

We will hold information relating to your application in accordance with the Trust's Records Management Policy. If you are unsuccessful we will hold your personal data for six months, after which time will be securely deleted.

If you are successful then the retention period will depend on type of information held. For further detail please see the Trust's Records Management Policy.

Your information is stored securely and at the end of the retention period is disposed of in a secure way. Our methods of disposal are in accordance with government guidance and are conducted in a way that ensures that reconstruction is highly unlikely.

### **Who will we share information with about your application?**

We will not share information gathered during your application process with third parties, other than professional advisors such as legal as HR advisors.

### **Your rights**

#### **How to access personal information we hold about you**

Individuals have a right to make a Subject Access Request to gain access to personal information that the Trust holds about them.

If you make a Subject Access Request, and if we do hold information about you, we will:

- 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, and any consequences of this

- give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

Please also refer to our Data Protection Policy for further details on making requests for access to personal data.

If you would like to make a request, please contact our Data Protection Officer.

### **Your other rights regarding your data**

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- object to the use of your personal data if it would cause, or is causing, damage or distress
- prevent your data being used to send direct marketing
- object to the use of your personal data for decisions being taken by automated means
- in certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing
- claim compensation for damages caused by a breach of the data protection regulations

To exercise any of these rights, please contact our Data Protection Officer.

### **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.

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