

PRIVACY NOTICE FOR ALL JOB APPLICANTS

Introduction

Aquinas Church of England Education Trust (Trust) is a Church of England trust, which is the data controller for the purposes of General Data Protection Regulation (GDPR). The Trust is a charitable company limited by guarantee under company number 07525735. The Trust's offices are at Magpie Hall Lane, Bromley BR2 8HZ. For further information please see www.aquinastrust.org.

As part of any recruitment process, Trust collects and processes personal data relating to job applicants.

The Trust is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations under the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA).

The purpose of this privacy notice is to make all job applicants aware of how and why we collect and use your personal information, before, during and after a job application process.

What information does the Trust collect?

The Trust collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration;
- whether or not you have a disability for which the Trust needs to make reasonable adjustments during the recruitment process;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The Trust collects this information in a variety of ways. For example, data might be contained in our online portal, application forms, CVs, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

The Trust will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers including information from criminal records checks. The Trust will seek information from third parties only once a provisional job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

Why does the Trust process personal data?

The Trust needs to process data to take steps at your request as a part of the job application process and prior to entering into a contract with you. It also needs to process your data to enter into a contract with you.

In some cases, the Trust needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The Trust processes personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows the Trust to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. The Trust may also need to process data from job applicants to respond to and defend against legal claims. The Trust processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Aquinas collects and use your information under the following lawful bases:

- a. where we have the consent of the data subject [Article 6 (a)];
- b. where it is necessary for the performance of a contract with the data subject [Article 6 (b)];
- c. where it is necessary for compliance with a legal obligation [Article 6 (c)];
- d. where it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller [Article 6 (e)].

Where the Trust processes other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes. As an educational provider the Trust is obliged to seek information about criminal convictions and offences. Where the Trust seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment. We will only process it where:

- a. we have explicit consent;
- b. processing is necessary for carrying out obligations under employment, social security or social protection law, or a collective agreement. In addition, the processing satisfies the requirements of Schedule 1 Part 1 of the DPA and / or
- c. processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject. In addition, the processing satisfies one of the requirements of 1 Part 2 of the DPA.

The Trust will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR department, interviewers involved in the recruitment process, managers in the department with a vacancy, and IT staff if access to the data is necessary for the performance of their roles.

The Trust will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment.

How does the Trust protect data?

The Trust takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does the Trust keep data?

If your application for employment is unsuccessful, the Trust will hold your data on file for six months after the end of the relevant recruitment process. If you wish the Trust to retain your details in relation to future opportunities it will only do so with your consent.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. For further details please see the Trust's Document Management and Retention Policy.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the Trust to change incorrect or incomplete data;

- require the Trust to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the Trust is relying on performance of a task in the public interest as the legal ground for processing; and
- ask the Trust to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the Trust's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Trust's Data Protection Officer Mary Capon by writing to her at Aquinas Trust, Magpie Hall Lane, Bromley BR2 8HZ or emailing her at info@aquinatrust.org and inserting 'subject access request' in the subject box.

If you believe that the Trust has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

You are under no statutory or contractual obligation to provide data to the Trust during the recruitment process. However, if you do not provide the information, the Trust may not be able to process your application properly or at all.