

## **Privacy Notice (How we use information in the process of recruitment)**

Stour Vale Academy Trust ('the Trust'), comprising the member schools and settings and the central team, collects and processes personal data as part of our recruitment process. The Trust and individual member schools and settings are joint data controllers for the purposes of Data Protection law.

We will gather and use information relating to the candidate.

Information that we hold in relation to individuals is known as their 'personal 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;
- to take steps to enter into a contract with you;
- to check that you are eligible to work in the United Kingdom;
- to check that you are not prohibited from teaching (where applicable); and
- to monitor applications for posts in the Trust to ensure that we are fulfilling our obligations under the public sector equality duty under the Equality Act 2010.

This will include data that we obtain from the candidate directly and data about the candidate obtained 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 unsuccessful.

We are committed to being transparent about how we collect and use the data and to meeting our data protection obligations. This privacy notice will inform you about why we collect and process a range of information about you as part of our recruitment process.

### **The categories of recruitment information that we collect, process and share include:**

#### *Candidates*

- personal information (such as name, address and contact details, employee or teacher number, details of your bank, national insurance number, information about your marital status, nationality, next of kin, dependants and emergency contacts);
- copies of your identification documents;

- special categories of data including characteristics information (such as gender, age, ethnic group, religion and sexual orientation);
- contract information (such as start dates, terms and conditions of your employment, hours worked, post, roles and salary information, information about entitlement to benefits such as pensions, information about your nationality, entitlement to work in the UK and periods spent outside the UK);
- work absence information (such as number of absences and reasons);
- qualifications (such as skills, experience and employment history, where relevant, subjects taught);
- information about your membership of professional bodies;
- details of driving licence (if relevant to the role);
- information about your criminal record;
- information about your DBS status (date of check and certificate number) (if held);
- details of any disciplinary or grievance procedures in which you have been involved (such as any warnings issued to you and related correspondence);
- assessments of your performance (such as appraisals, performance reviews and ratings, performance improvement plans and related correspondence);
- information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments);
- whether you are related to any pupil, employee, member, trustee or local governor within the Trust;
- details of any support or assistance you may need to assist you at the interview because of a disability.

### *Recruitment*

- last application date
- action taken date
- application notes
- candidate current job details
- application URL
- candidate status history and dates
- shortlisting notes
- online checks
- interview notes
- reason for rejection
- outcome information relating to interviews (including feedback and resulting recommendations)
- and other general candidate feedback

## **Why we collect and use recruitment information**

We collect and process personal data relating to prospective employees to ensure that our safeguarding and safer recruitment protocols are upheld.

We process personal data to meet the requirements set out in UK employment and childcare law, including those in relation to the following:

- Safeguarding Vulnerable Groups Act 2006 (as amended)

- Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018
- Keeping Children Safe in Education (latest version)
- Working Together to Safeguard Children 2026

The information collected also:

- enables individuals to be paid;
- informs the development of recruitment and retention policies;
- provides an accurate and up-to-date employment record with contact details (including details of who to contact in the event of an emergency);
- ensures that we comply with duties in relation to individuals with disabilities, meeting our obligations under health and safety law, and ensuring that employees are receiving the pay or other benefits to which they are entitled;
- ensures effective general HR and business administration;
- maintains and promotes equality in the workplace;
- enables the development of a comprehensive picture of the workforce and how it is deployed;
- improves the management of workforce data across the sector;
- allows better financial modelling and planning.

Some special categories of personal data, such as information about health or medical conditions, are processed to carry out employment law obligations (such as those in relation to employees with disabilities).

We may use artificial intelligence (AI) to support workforce administration, recruitment and data analysis. This processing is carried out in line with our legal obligations and public task in delivering education services. AI tools assist staff but do not replace professional judgement, particularly in safeguarding and employment decisions. We do not make solely automated decisions that have a significant impact on individuals without informing them and providing appropriate safeguards. All AI use is subject to human oversight, data protection controls and strict security measures. Where applicable, the Trust will undertake a data protection impact assessment.

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

We process this information under the following UK General Data Protection Articles:

6.1 (b) Processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.

6.1 (c) Processing is necessary for compliance with a legal obligation to which the controller is subject.

For example: The Health and Safety at Work Act, Equality Act 2010

6.1 (e) Processing 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.

For example: The Education Act requires the collection of workforce data for the purpose of Departmental Census. Working together to Safeguard Children Guidelines (DfE).

9.2 (b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

## **Collecting recruitment information**

We collect personal information in a variety of ways. For example, data might be collected through application forms; obtained from your passport or other identification documents such as your driving licence; from forms completed by you at the start of employment; from correspondence with you; or through interviews, meetings or other assessment. These collection methods include applications via online/website portals such as MyNewTerm.

In some cases, we may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law (such as Disclosure and Barring Service (DBS)).

## **Will your personal data be sought from third parties?**

Personal data is only sought from the data subject. No third parties will be contacted to obtain personal data pertaining to prospective members of staff without the data subject's consent.

Prospective staff members' personal data may be obtained and processed from third parties where the law requires us to do this, e.g. medical records from a GP. The categories of data obtained and processed from third parties include:

- Medical Records
- References
- DBS – Criminal Records

Where data is obtained from third parties, the personal data originates from the following sources:

- Medical professionals – medical check to indicate fitness to work
- Disclosure and Barring Service – regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs), whether you are barred from working in regulated activity

- Previous Employers – 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
- Home Office – immigration status and information from related documents, such as your passport or other identification and immigration information
- Check a Teacher's Record – if you are a teacher, we will use the DfE Check a Teacher's Record service to verify 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 or an overseas certificate relating to any criminal convictions if you have lived abroad)

## Storing this information

We hold data securely for the set amount of time shown in our data retention schedule.

If you are successful then how long we need to hold on to any information will depend on the type of information.

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

## Who we share this information with

Your information may be shared internally, including with those people responsible for HR and recruitment (including payroll), senior staff who you will report to or who will have supervisory/management responsibilities for you and business support and IT staff if access to the data is necessary for performance of their roles.

Some of the information we collect will be included in the Single Central Record of the school or setting in which you will be employed (or in the Single Central Record of the central team for centrally employed staff). The Privacy Notice (Workforce), explaining the data we collect, process, hold and share about you during your time with us, will be issued to you.

We routinely share this information with:

- our local authority
- the Department for Education (DfE)
- MyNewTerm
- iTrent/Neo People Management
- School/setting management information system (MIS)
- Health Assured
- CareCheck
- Office for National Statistics
- AvePoint
- Civica Education Operations (Parago)
- Evolve Advice
- TES Educare
- Relevant staff within Halesowen College (*central team employees only*)

## Why we share school, setting and central team workforce information

We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

### 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 (DfE)

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

All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current [government security policy framework](#).

For more information, please see 'How Government uses your data' section.

### MyNewTerm

We use MyNewTerm for job advertisements, applicant tracking and hiring of individuals in accordance with safer recruitment requirements.

### iTrent/Neo People Management

We are required to share information about workforce members with Neo People Management for the purposes of creating employment contracts for successful candidates through the HR information and payroll system iTrent. Information entered into the system is taken from new workforce members' application forms, qualification certificates, next-of-kin information and HMRC starter checklist forms to enable them to be paid. The system is also used to record absences and changes to roles, such as contract type or hours worked.

### Management Information Systems

We use management information systems for the purposes of recording staff data, including categories of personal information such as contact details.

### Health Assured

We offer use of Health Assured's anonymous mental health and wellness support platform and Wisdom App to all staff. We use Health Assured for pre-employment medical clearance and occupational health referrals.

### CareCheck

We use CareCheck, an umbrella body authorised by the Home Office, to process DBS applications.

### Office for National Statistics

We are required to complete an annual survey of hours and earnings on a

sample of workforce members selected by the ONS.

### **AvePoint**

We use AvePoint for secure cloud-to-cloud backup of online information and records held in Office 365, including that relating to workforce members.

### **Civica Education Operations (Parago)**

We use the Parago system for health and safety monitoring, including accident and incident reporting, and for recording annual declarations made.

### **Evolve Advice**

We use the Evolve system for approval of offsite visit arrangements, including visit leader contact details.

### **TES Educare**

We use TES Educare for online training courses to be completed by all workforce members.

### **Halesowen College**

We are required to share DBS information about central team members with Halesowen College, our central team office base, for safeguarding purposes.

## **CCTV**

This section of the privacy notice relates to CCTV systems, including, but not limited to, where it has been installed on the outside of some of the buildings. This section applies only to schools/settings that have CCTV systems installed.

### **What personal information does this service use?**

The CCTV system captures images of people and vehicles in and around where a camera is located. Where fixed CCTV cameras are operating, there will be signs clearly displayed. Images captured by CCTV will not be kept for longer than 30 days. However, on occasions there may be a need to keep images for longer, for example where a crime is being investigated.

### **What is this personal information used for?**

We use this personal data for the following reasons:

- a. To increase personal safety of pupils, staff and visitors, and reduce the fear of crime.
- b. To protect the school/setting buildings and their assets.
- c. To support the Police in a bid to deter and detect crime.
- d. To assist in identifying, apprehending and potentially prosecuting offenders.
- e. To protect members of the public and private property.
- f. To assist in managing the school/setting.

### **What is the lawful basis we are relying on?**

We collect and use this information to ensure the school/setting can undertake its remit to educate children ensuring personal safety of pupils, staff and visitors, protecting school/setting buildings and its assets and to assist in managing the school/setting (Article 6(1)(e) of the UK General Data Protection Regulation). The school/setting will use the 'Passport to Compliance', issued by the Surveillance Camera Commissioner, to ensure that the surveillance camera system complies with the Guiding Principles set out in the Surveillance Camera Code of Practice published by the Home Office as a requirement of the Protection of Freedoms Act 2012.

### **Where has your personal information come from?**

The images are captured because you are present in the area which is covered by the CCTV system.

### **Who will we share this personal information with?**

Your personal data is shared securely with the following, where it is both necessary and appropriate to do so:

- Relevant staff within the school/setting
- Our local authority
- The Police

## **Withdrawal of consent and the right to lodge a complaint**

Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting the Lead for Teacher Training.

## **Data Use and Access Act 2025 (DUAA)**

Under the Data Use and Access Act 2025 (DUAA), schools are required to provide an electronic complaints form for individuals who wish to raise complaints about how their personal data is handled.

If you have a complaint of this type, please complete the DUAA Complaints Form by clicking on this [link](#).

## **Last updated**

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time. This version was last updated in September 2026.

## **Requesting access to your personal data**

Under data protection legislation, you have the right to request access to

information about you that we hold. To make a request for your personal information, contact:

**YourIG Data Protection Officer Service**  
**Dudley MBC**  
**The Council House**  
**Dudley**  
**West Midlands**  
**DY1 1HF**

**Email:** [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk)

**Tel:** 01384 815026

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress;
- prevent processing for the purpose of direct marketing;
- object to decisions being taken by automated means;
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations.

In line with statutory guidance, we will respond to Subject Access Requests within one calendar month. However, if the request is received during the school holiday, we will liaise with the requestor to seek their agreement to treat receipt of the request as being on the first day back at school and will respond within the timescale outlined above.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## **Contact**

If you would like to discuss anything in this privacy notice, please contact:

**YourIG Data Protection Officer Service**  
**Dudley MBC**  
**The Council House**  
**Dudley**  
**West Midlands**  
**DY1 1HF**

**Email:** [YourIGDPOService@dudley.gov.uk](mailto:YourIGDPOService@dudley.gov.uk)

**Tel:** 01384 815026

## How to find out what personal information DfE hold about you

Under the terms of the Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data;
- for a description of the data they hold about you;
- the reasons they're holding it and any recipient it may be disclosed to;
- for a copy of your personal data and any details of its source.

If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the department: <https://www.gov.uk/contact-dfe>