



Privacy Notice for Job Applicants

How we use applicant information

Version	September 2026
Next review	September 2027
Data Controller	St Thomas Aquinas Catholic Multi-Academy Trust

This notice explains how the Trust collects, uses, stores and shares personal information about people who apply for work or other roles with the Trust and its academies.

1. Who we are

St Thomas Aquinas Catholic Multi-Academy Trust (the Trust) is the data controller for personal information processed by the Trust and its academies.

Registered/central office: Unit 5, Charnwood Edge Business Park, Cossington, Leicestershire, LE7 4UZ

Telephone: 0116 296 8171

Website: <https://www.aquinas-cmat.org>

Our Data Protection Officer (DPO) is Antoinette Bouwens. Questions about this notice or the way we use personal information can be sent to: dpo@aquinas-cmat.org or to the address above.

2. Who this notice applies to

This notice applies to people who apply for employment or other roles with the Trust or its academies. This may include prospective employees, workers, agency candidates, contractors, apprentices and volunteers where their personal information is processed as part of recruitment and selection. It may also cover information about referees, emergency contacts or other individuals provided during an application.

3. The information we collect and use

Depending on the role and stage of recruitment, we may process the following categories of information:

- personal identifiers and contact details, such as name, address, telephone number, email address and date of birth;
- application information, including application forms, CVs, supporting statements, employment history, job titles and reasons for leaving previous employment;
- education, qualifications, training, professional memberships and registration information;
- references and information supplied by referees;
- interview notes, assessments, scoring, selection decisions and recruitment correspondence;
- identity and right-to-work information, including copies of relevant documents and immigration or visa status where applicable;
- salary, remuneration and other information relevant to an offer of employment;
- information about employment gaps and other information required for safer recruitment;
- equality and diversity monitoring information;
- health, disability and access or reasonable-adjustment information where relevant;
- safeguarding, suitability and vetting information, including Disclosure and Barring Service (DBS) information and barred-list or other checks where lawful and required;
- publicly available online/ social media searches conducted for shortlisted candidates under Keeping Children Safe in Education (KCSIE) guidance;
- criminal conviction and offence information where relevant and lawful;
- information from professional or regulatory bodies, including teacher status or restrictions where applicable;
- photographs, CCTV images and visitor/security records if you attend one of our sites; and
- other information necessary to assess your suitability, meet legal or safeguarding duties, or administer the recruitment process.

Some of this information is special category personal data and requires additional protection. This may include information about health, disability, racial or ethnic origin, religion or philosophical beliefs, sexual orientation or trade union membership. Criminal offence information is subject to separate legal safeguards.

4. Why we collect and use personal information

Purpose of Processing	Primary UK GDPR Lawful Basis (Article 6)	Supporting Legal/Contractual Framework
Administering applications & evaluating suitability	Article 6(1)(b) Contract: Taking steps prior to entering into a contract.	Employment contract negotiations.
Pre-employment checks (Right to Work, TRA, Safeguarding)	Article 6(1)(c) Legal Obligation: Statutory duties under employment and education law.	Immigration Act 2014; Education Act 2002; KCSIE statutory guidance.
Online searches on shortlisted candidates	Article 6(1)(e) Public Task: Performing functions in the public interest / statutory duties.	Keeping Children Safe in Education (KCSIE) safeguarding requirements.
Health adjustments & suitability assessment	Article 6(1)(c) Legal Obligation & Article 6(1)(b) Contract.	Equality Act 2010 (duty to make reasonable adjustments).
Equality & Diversity monitoring	Article 6(1)(a) Consent or Article 6(1)(e) Public Task.	Equality Act 2010 monitoring standards.
Defending legal claims or handling complaints	Article 6(1)(f) Legitimate Interests or Article 6(1)(e) Public Task.	Trust legal governance and defence rights.

5. Our lawful bases

Under Article 6 of the UK General Data Protection Regulation (UK GDPR), we rely on one or more of the following lawful bases, depending on the purpose of the processing:

- Article 6(1)(b), contract: where processing is necessary to take steps at your request before entering into a contract, or to enter into a contract with you;
- Article 6(1)(c), legal obligation: where processing is necessary for us to comply with the law, for example relevant right-to-work or safeguarding requirements;
- Article 6(1)(e), public task: where processing is necessary to perform our functions in the public interest or in the exercise of official authority;
- Article 6(1)(a), consent: where we ask for freely given consent for a particular optional use of information; and
- Article 6(1)(f), legitimate interests: only where this basis is available and appropriate, and after balancing our interests against the individual's rights and interests.

The specific lawful basis depends on the activity and the legislation that applies to it. Our records of processing activities identify the relevant purpose, lawful basis and supporting legislation for each processing activity.

6. Special category and criminal offence information

Where we process special category personal data, we also identify an appropriate condition under Article 9 UK GDPR and, where required, a condition in the Data Protection Act 2018. Depending on the circumstances, these may include processing necessary for employment, social security and social protection law; substantial public interest, including equality of opportunity or treatment and safeguarding; occupational health; explicit consent where appropriate; or the establishment, exercise or defence of legal claims.

We process criminal record details (via DBS checks) strictly in compliance with Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018. Checks are conducted solely where necessary, proportionate, and lawfully mandated under safeguarding and education regulation.

7. How we collect information

We collect information directly from you during the recruitment process and may also receive information from:

- referees whose details you provide;
- previous employers, education providers and training organisations;
- recruitment agencies or other recruitment service providers;
- the Disclosure and Barring Service (DBS);
- the Teaching Regulation Agency (TRA) and other relevant professional or regulatory bodies;
- the Home Office and right-to-work checking services;
- occupational health providers where appropriate; and
- publicly available professional sources where it is necessary and lawful to verify information relevant to the role.

Some information is necessary for us to consider your application or to meet legal and safeguarding obligations. Where information is required, we will make this clear. If you do not provide information that is necessary for these purposes, we may be unable to progress your application or offer you a role.

8. How long we keep information and how we protect it

We keep recruitment information only for as long as it is needed for the purpose for which it was collected, or for as long as we are required to keep it. If your application is unsuccessful, we normally retain recruitment information for 12 months after the recruitment process has concluded, after which it is securely deleted or destroyed, unless there is a lawful reason to keep it for longer.

If your application is successful, relevant recruitment information will become part of your employment or personnel record and will be retained in accordance with the Trust's Retention and Destruction Policy. Different records may have different retention periods.

We use appropriate organisational and technical measures to protect personal information against accidental or unlawful loss, alteration, disclosure or access. When information is no longer required, we dispose of it securely.

9. Who we share information with

We only share personal information where there is a lawful basis to do so. Depending on the role and circumstances, we may share information with:

- relevant employees, governors or trustees involved in recruitment and decision-making;
- other academies within the Trust where relevant to the recruitment process;
- recruitment agencies and recruitment-platform providers;
- the Disclosure and Barring Service (DBS);
- the Teaching Regulation Agency (TRA) and other professional or regulatory bodies;
- the Home Office and right-to-work checking services;
- occupational health providers;
- professional advisers, including legal and HR advisers;
- contracted suppliers and service providers, including HR, recruitment, IT, communications and secure cloud services; and

- police, courts, regulators, safeguarding bodies or other public authorities where disclosure is required or permitted by law.

Where an organisation processes personal data on our behalf, we put appropriate contractual and data protection arrangements in place.

10. International transfers

Where third-party service providers (such as cloud platform suppliers) host or process personal data outside the United Kingdom, we ensure appropriate safeguards are in place in accordance with Chapter V of the UK GDPR. These safeguards include:

- Data transfers to countries recognized as providing an adequate level of protection by the UK Government; or
- Standard contractual safeguards, such as the UK International Data Transfer Agreement (IDTA) or UK Addendum to EU SCCs, supplemented by technical security assessments.

11. Consent and recruitment communications

Where we rely on consent for an optional use of personal information, we will explain what the information will be used for and how consent can be withdrawn. Withdrawing consent will not affect processing that took place lawfully before consent was withdrawn.

Communications necessary to administer your application do not rely on marketing consent. If we wish to retain your details for future vacancies or contact you about other opportunities beyond the recruitment exercise, we will explain the basis for doing so and provide any choices required by law.

12. Automated decision-making and profiling

We do not currently make recruitment decisions that have legal or similarly significant effects based solely on automated processing. If this changes, we will provide appropriate privacy information explaining the processing, its significance and the rights available to individuals.

13. Your data protection rights

Depending on the circumstances and the lawful basis used, you may have the following rights under data protection law:

- the right to be informed about how your personal information is used;
- the right of access to your personal information;
- the right to have inaccurate information corrected;
- the right to erasure in certain circumstances;
- the right to restrict processing in certain circumstances;
- the right to data portability where it applies;
- the right to object to processing in certain circumstances;
- rights relating to automated decision-making and profiling; and
- the right to withdraw consent where consent is the lawful basis.

These rights are not absolute and do not all apply in every circumstance. To exercise a right, contact our DPO using the details in section 1.

14. Complaints

If you have a concern about our use of personal information, please contact our DPO first so that we can try to resolve it.

You also have the right to complain to the Information Commissioner's Office (ICO):

Website: <https://ico.org.uk/make-a-complaint/>

Telephone: 0303 123 1113

Post: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

15. Changes to this notice

We review this privacy notice at least annually and whenever there is a significant change to how we use personal information. The current version will be made available through the Trust website.

16. Further information

For further information about data protection contact the DPO using the details in section 1.