ACHIEVING TOGETHER

FOUR STONES GATEWAY TRUST

PRIVACY NOTICE
FOR JOB APPLICANTS

DATE POLICY WAS APPROVED	30.04.2025
DATE POLICY WILL BE REVIEWED	SPRING 2027
MEMBER OF STAFF WITH RESPONSIBILITY FOR REVIEW	Head of IT Services

FOUR STONES GATEWAY TRUST
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Four Stones Gateway Trust is a company limited by guarantee registration number 9115941

Key Definitions

All Policies incorporate the following schools or organisations within Four Stones Gateway Trust ('the Trust'):

- Clee Hill Community Academy
- Cleobury Mortimer Primary School
- Haybridge High School and Sixth Form
- Haybridge Teaching School Hub
- Haybridge SCITT
- King Charles I School
- Lacon Childe School
- SHaW (Shropshire, Herefordshire and Wolverhampton) Maths Hub
- Stottesdon CofE Primary School
- TDMS (The De Montfort School)
- Any other schools or organisations that may join the Trust from time to time and not listed above.

The terms Academy, School, Organisation and Trust are considered interchangeable in the context of all Trust policies.

Where appropriate, in this Policy the term:

"CEO" includes the Chief Executive Officer

"CFOO" includes the Chief Financial Officer

"Trust Senior Leadership Team" includes Executive Headteachers, Headteachers, strategic operational leads and Teaching School/SCITT Directors.

"Headteacher" includes the appropriate School Headteacher.

"Trustees or Trust Board" are appointed Trustees who oversee the business of Four Stones Gateway Trust, agreeing the overarching strategic direction and ensuring robust governance.

"Local Academy Boards (LAB)" are appointed Governors at a local level associated with the Trust's Worcestershire Schools. LAB Governors act as advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Local Governing Bodies (LGB)" are appointed Governors at a local level associated with the Trust's Shropshire Schools. LGB Governors are advocates for their school's Safeguarding, SEND, Standards and Stakeholder engagement.

"Chair" responsible for leading the board and ensuring its effectiveness

"Stakeholders" are any individuals or companies who are invested in the welfare and success of the Trust and/or School and its students, including staff members, students, parents, community members, LAB, LGB or Trust members, trade unions, local business leaders etc.

Purpose of this Privacy Notice

The Data Protection Act 2018 provides individuals with the right to be informed about how their information is used by organisations.

This Privacy Notice explains how we collect, store and use personal data about individuals who apply for jobs with Four Stones Gateway Trust, one of our Academies, or with our SCITT, Teaching School Hub and Maths Hub.

Personal data is any information that can be used to identify you. It may include information you provide as part of an application process, information we already hold about you if you are already an employee, or information we collect from other organisations as part of pre-employment checks. When we use your personal data, this is known as “processing”.

Under data protection law, individuals have a right to be informed about how we collect, use and share personal data in relation to these processes. We comply with this right by publishing a Privacy Notice and making this available to you before you take part in our recruitment process.

This Privacy Notice explains:

- why we use your personal data.
- the reasons we need to do this.
- what kinds of personal data we use
- where we collect your personal data from
- who we will share your personal data with
- Your information rights
- who to contact if you need more information or have a concern.

Four Stones Gateway Trust is the ‘data controller’ for the purposes of data protection law.
The Trust is registered with the Information Commissioners Office: ZA521971

What information do we collect?

The Trust will only collect information about you that is necessary to support our recruitment and candidate management processes. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, training, experience and employment records and work history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information required to conduct statutory safeguarding checks, including searches of information about you that is available online;
- information relating to your performance and conduct from current and previous employers in the form of references;
- information about professional memberships you have
- information about your entitlement to work in the UK; and

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):

- equal opportunities monitoring information, including information about your ethnicity, gender identity, sexual orientation, health, and religion.
- Health and medical information relevant to your application
- Disability and access requirements

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 Local Authority services and the Disclosure and Barring Service in respect of criminal offence data.

How do we collect your information?

When you apply for a job with us, we collect your information in a variety of ways. For example, data might be contained in application forms, 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 and information from criminal records checks via the Disclosure & Barring Service.

In line with Part Three: Safer Recruitment (Keeping Children Safe in Education)

Shortlisting Process – Due Diligence

All shortlisted candidates will complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. An electronic signature will be replaced by a physical signature at the point of interview. The self-declaration will allow candidates the opportunity to share relevant information and allow this to be discussed and considered at interview before an Enhanced DBS certificate is received.

An online search will be undertaken for all shortlisted candidates as part of our due diligence processes. This may help identify any incidents or issues that have occurred and are publicly available online. Any related information will be shared with the interview panel to allow discussion with the candidate(s) at interview.

Where will your data be stored?

Data will be stored in a range of different places, including on your application record, in paper records, on our management systems, on our cloud-based IT infrastructure and on other internal IT systems (including email).

Why we process your personal data?

The Trust needs to process your personal data as part of the recruitment process. In some cases, we need to use your information to ensure we are complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts. We also have statutory duties to undertake in relation to safeguarding and safer recruitment guidance such as *Keeping Children Safe in Education.*

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment, and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where we have relied on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of applicant and potential employees and have concluded that this is not the case.

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.

Where we process 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 education provider, the Trust is obliged to seek information about criminal convictions and offences. Where we seek this information, it does so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

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

Our lawful basis for using this data

Under the UK General Data Protection Regulation (UK GDPR) we only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- 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

Who has access to your data?

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

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:

- Our partner schools
- Our Local Authorities (Worcestershire or Shropshire) to meet our legal obligations to share certain information with it, such as safeguarding concerns
- Suppliers and service providers to enable them to provide the service we have contracted them for, such as HR and recruitment support
- Employment and recruitment agencies
- The DBS service to obtain necessary criminal records checks
- Our legal representatives if you are engaged in a dispute or appeal process that determines it necessary to do so, or we are required to do so by a UK court
- Other official bodies (for the purposes of preventing and investigation of criminal activities, including fraud)
- The Department for Education, Teaching Regulation Authority, Ofsted, or Local Authority (Worcestershire or Shropshire) Designated Safeguarding Officer, where this is necessary as part of a formal investigation process.

Local Authorities

We are required to share information about our workforce members with our Local Authorities (LA) under Section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. The Trust is based in two Local Authorities – Worcestershire and Shropshire.

How does the Trust protect personal data?

The Trust takes the security of your data seriously. It has internal policies such as a Data Protection Policy and Records Management Policy 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. These policies can be viewed on the “Key Information” page of the Trust website.

The Trust will not transfer your data outside the UK without obtaining your consent and before ensuring there are appropriate contractual and security provisions in place.

How long do we keep recruitment data?

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. At this point it will be disposed of securely in line with our Trust Retention Schedule and Records Management Policy.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment.

The periods for which your data will be held will be provided to you in a new Privacy Notice once you are employed by the Trust.

What if you do not provide your 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, we may not be able to process your application properly, or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Your Information Rights

Data Protection law provides you with certain rights.

Requesting access to your personal data

You (or an authorised official representative) have the right to request access to information about you that we hold. 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.

To make a request to access your personal information, please contact our Data Protection Officer by emailing DPO@fourstonesgateway.org.uk

or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE.

When making a request you should confirm:

- The types of records you wish to access.
- any date periods these relate to

Please address letters: For the attention of the Data Protection Officer.

We may require you to provide proof of your identity before we can comply with your request.

Your Other Information Rights:

- **The right to know how your information is being used** – We uphold this by publishing Privacy Notices and letting you know how your information will be used when we collect it.
- **The right to have inaccurate information amended** - We uphold this right by asking you to review the information we hold on record and updating information if you provide evidence to show it has changed
- **The right to have information removed or deleted from your records** – We uphold this right by removing or deleting your information that we are no longer required to keep
- **The right to temporarily restrict how your information is used** - We uphold this right by not using information until we have confirmed what is accurate, unless it is necessary to do so
- **The right to object to us using your data for certain purposes** – We uphold this by asking for your consent or permission to use your information for these purposes (including direct marketing and for scientific/historical research and statistics)
- **The right for important decisions about you not to be made solely by automated systems that use your information (like computer algorithms and AI**) – We uphold this right by letting you know if these systems are used and giving you a choice for these types of decisions to be reviewed.

Who to Contact

The Trust has a Data Protection Officer (provided by Services 4 Schools Ltd). Their role is to oversee and monitor our data protection procedures, and to make sure we are compliant with data protection legislation.

The Data Protection Officer is responsible for helping Students and Parents uphold their information rights. You can contact our Data Protection Officer by emailing: DPO@fourstonesgateway.org.uk

or in writing to: Four Stones Gateway Trust, Love Lane, Cleobury Mortimer, Shropshire, DY14 8PE

Please address letters: For the attention of the Data Protection Officer.

Complaints or Concerns

If you have a concern or complaint about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer in the first instance. You can also raise a concern with the Information Commissioner's Office at https://ico.org.uk/concerns/