



Greater Manchester Academies Trust

Recruitment Privacy Notice

Greater Manchester Academies Trust

Revision Information

This document has been approved for operation within	All Trust Establishments
Date of last review	July 2026
Date of next review	August 2028
Status	Approved
Date of approval	
Review Period	Every two years, or when there has been material changes to the relevant courses of business
Person Responsible for Policy	Chief Operating Officer
Owner	Greater Manchester Academies Trust

Table of changes

Review Date	Changes Made	By Whom
Sept 2021	- Layout Changed - DPO statement added - DPO email address changed	NB
09/09/2024	DPO email address changed	AW
27/07/2026	- Updated UK GDPR terminology. - Updated students' rights wording. - Updated international transfer wording. - Added AI and automated decision-making wording. - Minor legislative and formatting updates.	NB

Data Protection Officer

The data protection officer (DPO) is responsible for overseeing the implementation of this policy, monitoring our compliance with data protection law, and developing related policies and guide- lines where applicable.

They will provide an annual report of their activities directly to the Trust governing board and, where relevant, report to the Trust board their advice and recommendations on Academy data protection issues.

The DPO is also the first point of contact for individuals whose data the Trust processes, and for the ICO.

Full details of the DPO's responsibilities are set out in their job description.
Our DPO is Andrew Woolley and is contactable via DPO@gmatrust.co.uk

With you...for you...about you...

GDPR Privacy Notice: Applicants to a new role Prospective employees

Who processes your information?

As part of Greater Manchester Academies Trust's (GMAT) recruitment process, certain personal information needs to be collected so that your application can be considered. This privacy notice explains how GMAT collects, uses, stores and shares your personal data.

Greater Manchester Academies Trust is the data controller for the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This means that the Trust determines the purposes and means by which your personal data is processed.

Our Data Protection Officer (DPO) is Mr Andrew Woolley and can be contacted at DPO@gmatrust.co.uk if you have any questions about how the Trust processes your personal data.

Where third parties process personal data on behalf of the Trust, appropriate data protection arrangements will be put in place to ensure that personal data is processed securely and in accordance with data protection legislation.

Why do we need your information?

We will only collect and use your personal information when the law allows us to.

Most commonly, we will process your personal information where:

- we need to comply with a legal obligation;
- we need to take steps at your request before entering into an employment contract;
- we need to fulfil our obligations under an employment contract;
- it is necessary for the legitimate interests of the Trust or a third party, where those interests are not overridden by your rights and freedoms; or
- we need to protect your vital interests, or those of another person.

We also process personal information where necessary to meet our safeguarding and safer

recruitment responsibilities and to carry out appropriate pre-employment checks.

Where we process special category personal data, such as information about your health, ethnicity or disability, we will only do so where an appropriate condition under data protection law applies.

Where we process information relating to criminal convictions or offences, including information obtained through Disclosure and Barring Service (DBS) checks, we will only do so where permitted by law and where the appropriate safeguards are in place.

Where we rely on your consent to process personal information, you have the right to withdraw that consent at any time.

Employment checks:

- Failure to provide the GMAT with ample proof of a right to work in the UK will prevent employment at GMAT.
- Failure to complete a DBS application, will prevent employment within GMAT.
- Employees found to be working illegally could face prosecution by law enforcement officers.
- Employees unwilling to provide two suitable referees may be prevented from employment within GMAT.
- Employees unwilling to complete a medical questionnaire, could be unwittingly unsupported in the delivery of their duties.

Salary requirements:

- Failure to provide accurate tax codes and/or national insurance numbers could lead to issues of delayed payments or an employee paying too much tax.
- Failure to provide banking details may prevent timely payment of salary to employees.

For which purposes are your personal data processed?

We use personal data about applicants and prospective employees to:

- manage the recruitment and selection process;
- assess your suitability for the role you have applied for;
- communicate with you about your application;
- verify your identity, qualifications, skills and employment history;
- obtain references and carry out appropriate pre-employment checks;
- undertake safeguarding and safer recruitment checks, including Disclosure and Barring Service (DBS) checks where appropriate;
- verify your right to work in the UK;
- consider and make reasonable adjustments during the recruitment process;
- comply with our legal and regulatory obligations; and

- where you are offered employment, take the necessary steps to enter into an employment contract and establish your employment record.

This is basically an expanded and clearer version of what the existing notice already says about contractual requirements, employment checks and reasonable adjustments.

The personal data we hold

The personal data GMAT will collect from the prospective members of staff includes the following:

- Name
- Phone number
- Address
- Work history for example, previous employers and positions
- Compensation for example, basic salary or benefits
- Education and work history, including professional qualifications and skills
- References, including regulated references where necessary
- Nationality, visa, proof of right to work permit information including passport, driving licence, National Insurance numbers
- Photographs and images from recorded assessments
- Results of pre-employment screening checks for example, credit history, criminal records check where permitted under local law
- Characteristics such as ethnic group
- Remuneration details
- Qualifications
- Absence information

The collection of personal information will benefit GMAT by:

- Improving the management of workforce data across the trust.
- Enabling the development of a comprehensive picture of the workforce and how it is deployed
- Informing the development of recruitment and retention policies.
- Allowing better financial modelling and planning.
- Enabling ethnicity and disability monitoring.
- Supporting the work of the School's teachers' review body.

Where we get your personal data from

We collect most of the personal information we process directly from you as part of the recruitment and selection process.

We may also obtain personal information about you from third parties where this is necessary and permitted by law. These may include:

- previous employers and referees;
- the Disclosure and Barring Service (DBS);
- relevant professional or regulatory bodies;
- organisations responsible for verifying qualifications or professional status; and
- occupational health or other appropriate health professionals, where relevant to the recruitment process.

Information obtained from third parties may include references, employment history, professional qualifications or status, criminal record information where appropriate, and information relevant to occupational health or reasonable adjustments.

We will only obtain and process information from third parties where there is an appropriate lawful basis for doing so and in accordance with data protection legislation.

How is your information shared?

We will only share your personal information with third parties where there is a lawful basis for doing so.

Where necessary and appropriate as part of the recruitment process, we may share your personal information with:

- the Disclosure and Barring Service (DBS);
- previous employers and referees;
- occupational health providers;
- relevant professional or regulatory bodies;
- local authorities and government departments or agencies;
- organisations providing recruitment, HR or employment-related services on behalf of the Trust; and
- other organisations where we are legally required or permitted to share information.

Where an organisation processes personal data on behalf of the Trust, we will ensure that appropriate data protection arrangements are in place.

We will only share the personal information that is necessary for the purpose for which it is being shared.

How long is your data retained for?

We will only retain your personal data for as long as necessary to fulfil the purposes for which it was collected, including for the purposes of satisfying any legal, accounting or reporting requirements.

Personal data relating to recruitment will be retained in accordance with the Trust's Data Retention Policy and retention schedule.

Where an applicant is successful, relevant personal information collected during the recruitment process will become part of their employment record and will be retained in accordance with the Trust's retention requirements for staff records.

Where an applicant is unsuccessful, their personal information will be retained for the appropriate period set out in the Trust's retention schedule and will then be securely deleted or destroyed.

Further information about how long we retain personal data can be obtained from the Data Protection Officer at DPO@gmatrust.co.uk.

What are your rights?

Under data protection law, you have rights regarding how your personal data is used and kept. Depending on the circumstances, these include the right to:

- ask to see the personal information we hold about you;
- ask us to correct personal information that is inaccurate or incomplete;
- ask us to delete your personal information where the law allows;
- ask us to restrict the processing of your personal information in certain circumstances;
- object to the processing of your personal information in certain circumstances;
- withdraw your consent at any time where we are relying on consent to process your personal information;
- ask us to transfer your personal information to another organisation where the right to data portability applies;
- object to decisions based solely on automated processing, including profiling, where applicable; and
- make a complaint to the Information Commissioner's Office (ICO).

These rights do not apply in all circumstances and may be subject to exemptions under data protection legislation.

If you wish to exercise any of these rights, please contact the Data Protection Officer at DPO@gmatrust.co.uk.

Subject Access Requests

You have the right to request access to personal information that the Trust holds about you. This is known as a Subject Access Request.

To make a Subject Access Request, please contact the Data Protection Officer at DPO@gmatrust.co.uk.

The Trust will respond to requests in accordance with the requirements and timescales set out in data protection legislation.

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 Andrew Woolley (DPO@gmatrust.co.uk), the trust's data protection officer.

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

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/>

For any further information, please contact Andrew Woolley – data protection officer for GMAT.