



BMAT Recruitment Privacy Notice

The Beacon Multi-Academy Trust (hereinafter, 'BMAT') is the data controller for the purposes of this notice. As part of its candidate application and recruitment activities, BMAT collects, processes and stores personal and special categories of data (hereinafter, 'personal data') which may directly or indirectly identify individual data subjects. BMAT processes personal data for a range of purposes relating to general recruitment activities, as well as the recruitment process. This may include application data, interview or assessment data, pre-employment screening data, and worker permissions data. This Candidate Privacy Notice (hereinafter, 'Privacy Notice') sets out:

1. Why BMAT collects your personal data;
2. What personal data BMAT collects; and
3. How that personal data is processed within the recruitment process.

Throughout this Privacy Notice, the term "processing" is used to cover all activities involving your personal data, including: collecting, handling, storing, sharing, accessing, using, transferring and disposing of the data.

1. Why does BMAT collect your personal data? BMAT only processes your personal data where it is lawfully permitted for one or more of the purposes set out below.

Not all of the purposes set out below will apply to you all of the time.

- a. *Application:* Activities carried out in the course of receiving and assessing candidate applications, including reviewing general applications or applications for specific jobs and processing data to enable subscription to job alerts. This may involve the processing of your CV, name, address, employment history, academic and professional qualifications, age, diversity data including gender, ethnicity, disability, sexual orientation, nationality and previous disciplinary matters;



- b. *Assessment*: activities carried out in the course of assessing candidate suitability for roles at BMAT, which may involve the processing of your CV, psychometric tests (such as a situational judgement test, ability or personality test), interview (face to face, telephone or video), behavioural assessments (such as a role play, group exercise or presentation), and technical assessments;
- c. *Pre-employment screening (PES)*: pre-employment screening activities carried out for the purposes of financial, credit history and insurance risk assessments; criminal records checks; county court judgements checks, adverse media checks, screening against external databases and sanctions lists to establish connections to politically exposed persons; determining penalties for tax evasion.
- d. *Candidate searches*: In the course of its search activities, BMAT uses personal data that it has collected concerning candidates to identify professional opportunities that BMAT thinks may be of interest. BMAT may contact potential candidates from time to time regarding such opportunities.
- e. *General recruitment activities*: market research activities and specific or speculative recruitment-related activities.

2. What personal data might BMAT process and how will BMAT collect it?

Generally, BMAT collects personal data directly from you in circumstances where you provide it to us by applying directly for a role at BMAT, or information that BMAT learns about you through your interactions with the organisation, or with third parties (e.g. recruitment agencies). BMAT may also collect personal data about you from third parties, including, for example, when a referee provides information about you, when a colleague recommends that BMAT considers you for a position or from other sources where you have made your personal data publicly available for the purposes of recruitment on jobs boards, LinkedIn (or other publicly available social media networks and databases). Here are some examples of the type of personal BMAT may process about you. There's a full list in the schedule at the end of this notice.

- a. *Your Personal data, including:*



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- i. Personal details such as name, address, email address and date and place of birth;
- ii. Work history/job data; previous employers, positions, dates, etc.
- iii. Compensation; basic salary, benefits, bonuses, etc.;
- iv. Education and work history including professional qualifications and skills;
- v. Employer feedback / references, to include regulated references where necessary;
- vi. Nationality / visa / right to work permit information; (e.g. passport, driving licence, National Insurance numbers);
- vii. Photographs and images from recorded assessments or from on site CCTV;
- viii. Results of pre-employment screening checks (e.g. credit history, criminal records checks where permitted under local law);
- ix. Assessment results e.g. psychometric assessment results, results from ramification and video or telephone assessment.

b. Your Special Categories of Information:

- i. During the process BMAT may also inadvertently capture some special categories of personal data about you (e.g. information relating to your racial or ethnic origin, religious or philosophical beliefs, trade union membership, physical or mental health or condition, sexual orientation), where this has been provided or made publicly available by you or can be inferred from your CV;
- ii. BMAT may also process certain special categories of information about you (e.g. information about a physical or mental health or condition) to make reasonable adjustments to enable candidates to apply for jobs with BMAT, to be able to take online/telephone assessments, to attend interviews/assessment centres, to prepare for starting at BMAT (if successful) and to ensure that BMAT complies with regulatory obligations.
- iii. BMAT may also process information relating to criminal convictions and offences (e.g. as part of pre-employment screening checks).



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BMAT will only process special categories of information or information about criminal convictions and offences where BMAT has obtained your explicit consent or where permitted by applicable laws. Where BMAT processes personal data based on your consent, you have the right to withdraw that consent at any time where there is no other legal basis for the processing.

3. Legal basis for the processing: BMAT's entitlement to process your personal data is governed by a number of processing conditions. This means that BMAT may rely on more than one of these conditions to process elements of your personal data throughout the recruitment process, for example:

- a. It is in the legitimate interests of BMAT to process your personal data in the administration of your application and for general recruitment purposes;
- b. BMAT will also process your personal data where it is required by law or regulation. This processing will always be fair and lawful and will comply with the principles of applicable privacy laws;
- c. During the course of your application it may also be necessary for BMAT or its suppliers to process special categories of information about you (as per the detail in Schedule 1 of this notice) where BMAT has obtained your explicit consent or where permitted by applicable laws.

4. Who does BMAT share your personal data with? BMAT will need to share your personal data internally and may require share it with some external parties or associates of BMAT.

- a. To enable recruitment processes, your personal data will be shared internally, but the information shared is limited to what is required by each individual to perform their role in the recruitment process. Internal sharing is limited to:
 - i. Those employees who would have managerial responsibility for you or those acting on their behalf;
 - ii. Employees in HR who have responsibility for certain HR processes (for example, recruitment, assessment, pre-employment screening);



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- iii. Employees with responsibility for investigating issues of non-compliance with laws and regulations, internal policies and contractual requirements;
 - iv. Employees in IT and system owners who manage user access;
 - v. Audit and Investigations employees in relation to specific audits/investigations; and
 - vi. Security managers for facilities / premises.
- b. BMAT may also need to share your personal data with certain external third parties including:
- i. Companies who provide recruitment and candidate interview and assessment services to BMAT;
 - ii. Suppliers who undertake background screening on behalf of BMAT (credit checking agencies, criminal checking bureaus, etc.);
 - iii. Academic institutions, invalidating information you've provided;
 - iv. Individuals and companies that you have previously worked for who may provide references/recommendations to BMAT;
 - v. Other third-party suppliers (or potential suppliers), who provide services on BMAT's behalf.
- c. If BMAT transfers your personal data outside the EEA, BMAT will ensure that it is protected in a manner that is consistent with how your personal data will be protected by within the EEA. This will be determined by reference to guidance from the ICO and/or European Commission.
- d. Your data will only be shared if it is necessary or required (for example in order to carry out pre-employment screening).
- e. How does BMAT protect your information? BMAT's HR and Recruitment systems are protected to ensure that unauthorised or unlawful processing of personal data, accidental loss or destruction of, or damage to, personal data does not occur. This is done in accordance with the [BMAT Data Protection Policy](#).
- f. Where BMAT shares personal data with other parties located outside your country, as a minimum, BMAT will require that such personal data is protected as required by the laws of the country where you work.



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- g. In addition to using your personal data for the position for which you have applied, BMAT may retain and use your personal data to consider you for other positions. If you do not want to be considered for other positions or would like to have your personal data removed, you may contact us as specified under Inquiries, Complaints and Objections below.
- h. Unless required for tax or other legal purposes or in connection with employment as specified above, your personal data will be retained in accordance with the [BMAT Retention Schedule](#) (which means that BMAT may hold some information after your application to BMAT is complete).

5. Your Rights

- a. *Access, correction and deletion:* You are entitled to see the personal data that BMAT holds about you. You can also request changes to be made to incorrect personal data and can ask for your personal data to be deleted or blocked if you legitimately think that BMAT shouldn't be processing that data or is processing it incorrectly, except where retention of that personal data is required in the context of a legal dispute, or as otherwise required by law. If access, correction or deletion is denied, the reason for doing so will be communicated to you.
- b. *Inquiries, objections and complaints:* If you have any queries about this notice or your personal data generally, including questions about accessing your personal data or correcting it, you should contact the BMAT Data Protection Officer in the first instance, at data@beaconacademytrust.co.uk. You may also withdraw consent to the processing of your personal data or submit complaints and/or objections to the processing of your personal data by sending a request in writing to data@beaconacademytrust.co.uk. For more information on subject access requests, see the [BMAT Data Protection Policy](#).
- c. It is your responsibility to keep your personal data up to date so that accurate application records can be maintained. You can manage all of your applicant data by contacting the BMAT HR Team at hr@beaconacademytrust.co.uk, in the first instance.



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- d. When asked to remove a record from its database, BMAT will retain minimal personal data to prevent future contact and where required in accordance with legal or regulatory requirements.

6. Screening Checks: As part of the selection process, BMAT performs screening checks, where permitted by local law. These checks are only performed on successful applicants. Consent will be required before these checks are performed.

7. Criminal records checks: Given the nature of its business, BMAT has legal and regulatory obligations to ensure that the people it employs are safe to work with and around children. BMAT therefore asks questions about any prior civil or criminal proceedings you may have been subject to and may also conduct criminal record checks.

8. Credit reference agencies: BMAT may undertake searches about you at credit reference agencies who will supply it with information, including information from the electoral register, in support of recruitment decisions. The agencies will record details of the search but will not make them available for use by lenders to assess your ability to obtain credit. BMAT may use scoring methods to assess this application and to verify your identity. You have the right of access to your personal records held by credit reference agencies. BMAT will supply their names and addresses upon request.

9. Fraud prevention agencies: To prevent or detect fraud, or assist in verifying your identity, BMAT may now and periodically make searches at fraud prevention agencies. Should its investigations identify fraud or the commission of any other criminal offence by you (on your part) when applying for, or during the course of your employment with BMAT, BMAT will record details on this on fraud prevention databases. This information may be accessed from the UK and other countries and used by law enforcement agencies and by BMAT and other employers (and potential employers) to prevent fraud. Please contact us if you



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want to receive details of the relevant fraud prevention databases through which BMAT may share information.

10. Automated processing: BMAT does not generally make recruiting or hiring decisions based solely on automated decision-making. In the event that BMAT relies solely on automated decision-making that could have a significant impact on you (e.g. automated psychometric and behavioural testing), it will provide you an opportunity to express your views and will provide any other safeguards required by law.

11. Direct Marketing: BMAT will not use personal data collected about you for the purposes of recruitment to offer you any products or services for personal or family consumption, or provide your personal data to third parties for their direct marketing. BMAT will ask for your consent prior to sending you communications about future events and opportunities that are relevant to you.

12. Changes to this Privacy Notice: As this Privacy Notice is updated, the current version will be published.

Schedule 1: Full list of personal data that BMAT may process

- Name, work and home contact details;
- Date and place of birth;
- Education and work history;
- *Individual demographic information in compliance with legal requirements (such as marital status, national identifier, passport/visa information, nationality, citizenship, military service, disability, work permit, date and place of birth or gender);
- *Health issues requiring adaptations to working environment
- Job title, grade and job history;
- Employment contract related information (including compensation, location, hours of work and so on);
- Reporting and managerial relationships;
- *Leaves of absence (such as maternity leave, sickness absence);



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- Photograph(s);
- Disciplinary / grievance records;
- Time and attendance details;
- *Bank account details for salary payment purposes;
- Personal data contained in CVs (e.g. name, address, telephone number, e-mail address, employment history, degree(s) and other qualifications, languages and other skills). These may also include, without limitation: age, nationality and race (only to the extent allowed by law), compensation details, a record of BMAT's contact history with you and comments from third parties;
- Skills and qualifications;
- Personal data which you have made available for the purposes of recruitment on jobs boards, LinkedIn (or other publicly available social media networks) and to third parties such as recruitment agencies that BMAT works with;
- Training history and plans;
- Results of original and on-going employee screening, where relevant;
- Details provided in relation to conduct policies (such as conflicts of interest, personal account dealing, trade body membership and so on);
- *Health & safety incidents, accidents at work and associated records;
- BMAT CCTV images;
- Audio recordings of telephone interviews;
- Video recordings of interviews;
- Notes from face to face interviews;
- Psychometric test results and associated reports;
- Results from behavioural assessments (e.g. Assessment Centre exercises);
- Results from technical assessments;
- References and recommendations;

**These categories of information might potentially include some special categories of data. Special categories of information are not routinely collected about all applicants, but may be collected where BMAT has a legal obligation to do so, or if you choose to disclose it to us during your relationship with BMAT.*