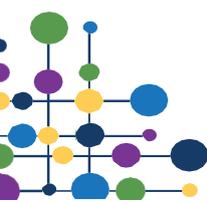
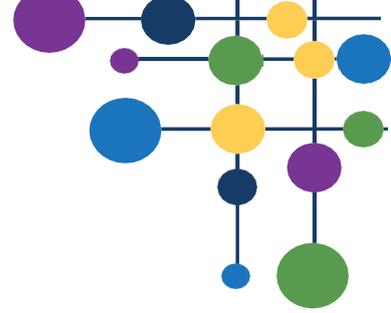


## **REFEREES PRIVACY NOTICE FOR USE WITHIN THE TRUST**

Version	1.0
Name of policy writer	Natalie McSheffrey
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## Introduction

SHARE Multi-Academy Trust is the data controller for the use of personal data in this privacy notice.

This privacy notice advises referees of the trust’s data protection responsibilities on the collection and processing of their personal information.

We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

## The categories of information that we process

The categories of personal information that we process include the following:

- Personal information – e.g. name, contact details and address
- Information relating to your job role – e.g. company/institution name, job title and responsibilities
- Assessment of a prospective employee’s character – e.g. how long you have known them and, where appropriate, their performance
- Your relationship to the applicant – e.g. former employer, relative or other.

This list is not exhaustive.

## Why we collect and use your information

We collect and use your information for the following reasons:

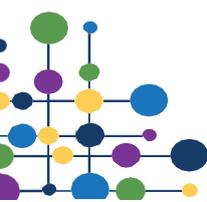
- To facilitate safer recruitment
- To review our recruitment performance

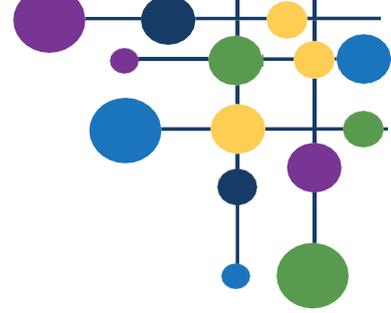
Under the UK GDPR, the legal basis/bases we rely on for processing your personal information as a referee are:

- For the purposes of (a) to comply with a legal obligation
- For the purposes of (a) and (b) to carry out a task in the public interest.

## Legal obligation

We need to process data to ensure that we are complying with our legal obligations. Safer recruitment procedures in schools require appropriate checks to be made on





persons seeking employed or voluntary roles within schools. Seeking references is one of the listed requirements in the statutory guidance for schools and colleges [Keeping Children Safe in Education](#).

Disclosing information to third parties such as the courts or the police where we are legally obliged to do so is also included within this section.

### Public interest

We consider that we are acting in the public interest when providing education. Specifically, we have a public interest in:

- Fulfilling our safeguarding obligations
- Managing the school efficiently.

### Collecting your information

We collect your personal information via the following methods:

- SHARE Multi-Academy Trust Reference Pro-forma.

The collection of data via referees is essential for the trust's operational use and to achieve safer recruitment. The information you provide us with is requested on a voluntary basis. The information we collect from you is kept to a minimum in order to avoid overly burdensome reference checks and to respect your privacy. To comply with the UK GDPR, we will inform you at the point of collection whether you are required to provide certain information to us or if this is optional.

### Storing your information

We hold data securely for the set amount of time shown on our data retention schedule in the SHARE MAT records management policy.

- We create and maintain a file for references received. The information contained in this file is kept secure and is only used for purposes directly relevant to ensuring that a reference is satisfactory.

For more information on our data retention schedule and how we keep your data safe, please visit our data protection policies available on SHARE Multi-Academy Trust's website.

We take the security of your personal data very seriously. We have internal policies and controls in place to try to ensure that data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the performance of their duties.

Where we engage third parties to process personal data on our behalf, they do so based on written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### Who we share your information with and why

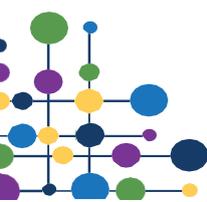
Data obtained via a reference proforma will only be shared with those who are involved in the recruitment process. The trust and its schools will not share data with anyone who has no reason to access it, including the person for whom the reference is for.

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

Any information we share with other parties is transferred securely and held by the other organisation in line with their data security policies.

### The use of Artificial Intelligence (AI)

SHARE MAT only use Microsoft 365 Copilot, which is an AI-powered activity tool



integrated within Microsoft 365 applications and follows strict data security and privacy commitments as set out below:

**Data Collection:** Copilot prompts and inputs are securely processed using Azure OpenAI services. This includes data such as location, IP address, system information, and browser information.

**Data Processing:** Microsoft ensures that organisational data remains protected. The data is processed within the Microsoft 365 Graph, inheriting all existing security, privacy, identity, and compliance requirements.

**Data Storage:** Data is stored securely and encrypted. Microsoft ensures that data is not shared without permission and is not used to train foundation models without consent.

**Privacy Commitments:** Microsoft has outlined several commitments to protect data, including keeping organisations' data private, maintaining access control and enterprise policies, and complying with global data protection regulations.

### **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 the trust's Data Protection Officer at [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk).

You also have the right to:

- Ask to correct any incomplete or inaccurate data
- Withdraw your consent to process your personal data at any time
- Request the deletion or removal of personal data where there is no compelling reason for the continued processing
- Object to direct marketing (including profiling) and processing for the purposes of scientific and/or historical research and statistics
- Not be subject to decisions based purely on automated processing where it produces a legal or similarly significant effect on you
- Complain to the ICO.

### **The right to raise concerns, complaints or withdrawal of consent**

If you are concerned about the way we are collecting or using your information, please raise your concern with us in the first instance to the data protection officer at [Jayne.newson@sharemat.co.uk](mailto:Jayne.newson@sharemat.co.uk). You can also contact the Information Commissioner's Office (ICO) at <https://ico.org.uk/concerns>. The ICO is the UK's independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

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 trust's Data Protection Officer at [Jayne.newson@sharemat.co.uk](mailto:Jayne.newson@sharemat.co.uk).

### **How can you find out more information?**

If you would like to discuss anything in this privacy notice, please contact the DPO at [jayne.newson@sharemat.co.uk](mailto:jayne.newson@sharemat.co.uk).

If you require further information about how we and/or the DfE store and use your personal data, please visit our [website](#) where you can find the latest version of our Data Protection Policy, or the Gov.UK website (<https://form.education.gov.uk>).

