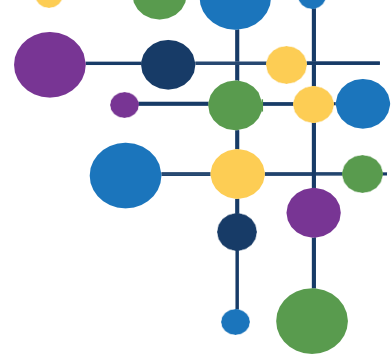


REFEREES PRIVACY NOTICE FOR USE WITHIN THE TRUST

Version	2.0
Name of policy writer	Jayne Newson
Date of last review	6 th February 2025
Next review date	June 2027
Approved by Directors or Delegated Authority	1 st June 2026





Contents

Introduction	2
The categories of information that we process.....	2
Why we collect and use your information	3
Collecting your information.....	3
Storing your information.....	4
Who we share your information with and why.....	4
The use of Artificial Intelligence (AI)	4
Requesting access to your personal data.....	4
The right to raise concerns, complaints or withdrawal of consent.....	5

Introduction

SHARE Multi-Academy Trust, whose registered office is at Shelley College, Huddersfield Road, Shelley, Huddersfield HD8 8NL is the data controller for the use of personal data in this privacy notice.

The trust is registered with the ICO under registration number ZA479462.

The trust has a Data Protection Officer whose contact details are set out below:

Jayne Newson – Data Protection Officer

Email: jayne.newson@sharemat.co.uk

Tel: 01484 955007

By post to:

Mrs J Newson
 Data Protection Officer
 Heaton Avenue, A SHARE Primary Academy
 South Parade
 Cleckheaton
 West Yorkshire
 BD19 3AE

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

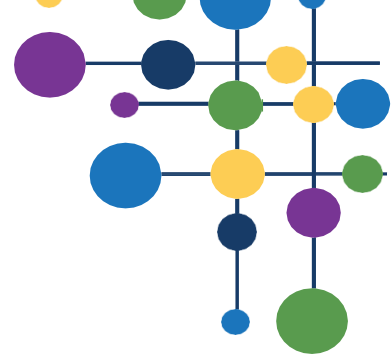
We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations. The trust processes personal data in accordance with UK GDPR, the Data Protection Act 2018, and other applicable UK data protection legislation, including relevant provisions under the Data (Use and Access) Act 2025.

We are required to explain how and why we collect such data and what we do with that information. This notice will also provide information about your personal information that is held and processed by us.

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.

Where processing is likely to result in a high risk to individuals’ rights and freedoms, the trust carries out Data Protection Impact Assessments (DPIAs).

All third party processors handling personal data on behalf of the trust are subject to contractual data protection obligations.

Why we collect and use your information

We collect and use your information for the following reasons:

- a) To facilitate safer recruitment
- b) 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.

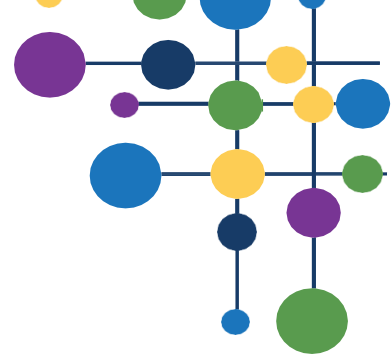
Collecting your information

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 take the security of personal data very seriously. Data is stored in the UK/Ireland, however some service providers may process limited personal data outside the UK. Where this occurs, appropriate safeguards are applied in accordance with UK GDPR. 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.

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.

We hold data securely for the set amount of time shown in our data retention schedule which is aligned with the IRMS Management Toolkit. 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.

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)

The trust may use approved AI tools to support administrative activities. AI tools are not used to make solely automated decisions. Any use of AI involving personal data is subject to human oversight, security controls and data protection safeguards. The trust currently uses Microsoft 365 Copilot within its secure Microsoft environment.

Further information about the use of AI can be found in the SHARE MAT Artificial Intelligence Policy & Procedure.

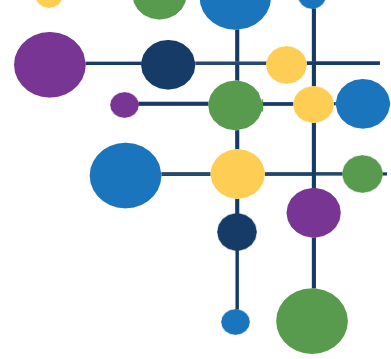
Requesting access to your personal data

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, whose contact details are set out at the beginning of this privacy notice.

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.

We will normally respond to information rights requests within one calendar month.

The right to raise concerns, complaints or withdrawal of consent

If you have any concerns about the way we collect or process your data or you would like to discuss anything in this privacy notice, please contact the Data Protection Officer in the first instance.

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. This only applies where consent is the lawful basis and does not affect statutory processing.

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://www.gov.uk/guidance/data-protectionhow-we-collect-and-share-research-data>).

If you require this privacy notice in an alternative format, please contact the Data Protection Officer.

Schedule of Amendment

Version	Amendment
1.0	New version
2.0	Strengthened the document in terms of AI governance, CCTV transparency, international transfers and DUAA 2025 awareness and technical wording amended to be more reader friendly

