

RECRUITMENT PRIVACY NOTICE

Data protection privacy notice (recruitment)

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. It applies to all individuals applying for a position at the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. It also applies to individuals we will contact in order to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are applying to work with us (whether as an employee, worker, or contractor). We are required to notify you of this information under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

WHO COLLECTS THE INFORMATION

Pitsford School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

Pitsford School Pitsford Hall Pitsford Northamptonshire NN6 9DY

Telephone: 01604 880306

Email: Office@pitsfordschool.com



DATA PROTECTION PRINCIPLES

We will comply with the data protection law and principles when gathering and using personal information, as set out in our privacy notice for staff and our Data Protection Policy. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.
- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept safely and securely.

ABOUT THE INFORMATION WE COLLECT AND HOLD

Table 1 below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

Table 2 below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

WHERE INFORMATION MAY BE HELD

Information may be held on school premises in our filing systems and on our servers. It may also be held on our behalf by third party agencies, service providers and representatives.

HOW LONG WE KEEP YOUR INFORMATION

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application, or the application you are



supporting (e.g. as a referee) is successful and you (the job applicant) become employed by us, the nature of the information concerned and the purposes for which it is processed.

We will keep recruitment information (including interview notes) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. This is likely to be for six months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by the School. If there is a lawful reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised, and the longer period for which they will be kept.

If you are an applicant and your application is successful and you join the School, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the Privacy Notice for Staff.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

Further details on our approach to information retention and destruction are available in our Data Protection Policy.

YOUR DATA RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

Please contact our Bursar, Mrs Sarah Sherlock who can be contacted on <u>SSherlock@pitsfordschool.com</u>, or telephone 01604 880306 if you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You also have other rights including the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. Our Bursar, Mrs Sarah Sherlock will provide you with further information about your data rights, if you ask for it. You may also want to read the privacy notice for staff which provides more detail on this.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine need to know it. Those



processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected personal data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

HOW TO COMPLAIN

Mrs Sarah Sherlock, Bursar oversees compliance with this privacy notice. We hope that our Bursar can resolve any query or concern you raise about our use of your information. If not, you can contact the Information Commissioner's Office at https://ico.org.uk/concerns/ or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.



SCHEDULE ABOUT THE INFORMATION WE COLLECT AND HOLD

Table 1: Up to and including the shortlisting stage

The information we collect	How we collect the	Why we collect the	How we use
	information	information	and may share
			the
			information
Your current and any former names, title, date of birth, gender, national insurance number, and contact details (i.e. current address, home and mobile phone numbers, email address)	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your	From you, in the	Legitimate interest: to	To make an
qualifications, experience,	completed application	carry out a fair	informed
employment history	form and interview	recruitment process	recruitment
(including job titles, salary	notes (if relevant)	Legitimate interest: to	decision
and working hours) and		make an informed	Both the person
interests		decision to shortlist for	making the
			making the

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		interview and (if	shortlisting
		relevant) to recruit	decision and, if
			you are invited
			for interview, the
			interviewer will
			receive these
			details.
Your name, contact details	From you, in the	Legitimate interest: to	To make an
and details of your	completed application	carry out a fair	informed
qualifications, experience,	form and interview	recruitment process	recruitment
employment history and	notes (if relevant)		decision. To
interests			comply with
			legal/ regulatory
			obligations.
			Information
			Information
			shared with
			relevant
			managers and
			HR Personnel.
Information about you that is	From standard online	Legitimate interest: to	To make an
publicly available online	searches using a web	form part of the	informed
through online searches	browser, website, or	school's wider	recruitment
	social media platform.	safeguarding due	decision.
		diligence.	
			The member of
		Legitimate interest: to	staff carrying out
		make an informed	the search, if not
		decision to shortlist for	involved in the
		interview and (if	decision-making
		relevant) to recruit.	process, may



To comply with our	share any
legal obligations	relevant
including those	information
contained in the	related to
statutory guidance for	suitability with
schools: <i>Keeping</i>	the individuals
Children Safe in	who will be
Education (KCSIE).	interviewing.
	This way the
	decision makers
	will only have
	the relevant
	information that
	may need to be addressed at
	interview and
	will not be
	exposed to
	other
	information.
	Search results
	will be reviewed
	and, if
	appropriate,
	explored with
	the applicant at
	interview.
	To comply with
	legal/regulatory
	obligations.



			For further
			information, see
			* below
	- ·	-	
Your racial or ethnic origin,	From you, in a	To comply with our	To comply with
sex and sexual orientation,	completed anonymised	legal obligations and for	our equal
religious or similar beliefs	equal opportunities	reasons of substantial	opportunities
	monitoring form	public interest (equality	monitoring
		of opportunity or	obligations and
		treatment).	to follow our
			equality and
			other policies
			For further
			information, see
			* below
			below
Details of your referees	From your completed	Legitimate interest: to	To carry out a
	application form.	carry out a fair	fair recruitment
		recruitment process	process
		To comply with our	To comply with
		legal obligations to	legal/regulatory
		request references	obligations
			Information
			shared with
			relevant
			managers, HR
			personnel and
			the referee.
Criminal Record Information	From your self-	Legitimate interests: to	To make an
or information that would		carry out a fair	informed



make you unsuitable to work	declaration form	recruitment process	recruitment
with children		including giving	decision and
		candidates the	given
		opportunity to discuss	candidates the
		their disclosure with the	opportunity to
		School before a DBS	discuss their
		check is obtained.	disclosure with
			the School.
		To comply with our	
		legal obligations	To comply with
		including those	legal/regulatory
		contained in the	obligations
		statutory guidance for	
		schools: <i>Keeping</i>	For further
		Children Safe in	information, see
		Education (KCSIE).	* below
		For reasons of	
		substantial public	
		interest (preventing or	
		detecting unlawful acts,	
		and protecting the	
		public against	
		dishonesty)	

The information we collect	How we collect the	Why we collect the	How we use
	information	information	and may share



			the information
Information about your	From your referees	Legitimate interest: to	To obtain the
previous academic and/or	(details of whom you	make an informed	required
employment history,	will have provided)	decision to recruit	reference about
including details of any conduct, grievance or		To comply with our	you
performance issues,		legal obligations	To comply with
appraisals, time keeping and		including those	legal/regulatory
attendance, the reason you		contained in the	obligations
left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance <i>"Keeping Children Safe in Education" (KCSIE)</i> , from references obtained about you from previous employers and/or education providers. †		statutory guidance for schools: <i>Keeping</i> <i>Children Safe in</i> <i>Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	Information shared with relevant managers and HR personnel
In respect of applicants for	From a letter from the	Legitimate interest: to	To comply with
teaching positions who have	professional regulating	make an informed	legal/regulatory
lived or worked outside the	authority in the country	decision to recruit	obligations
UK, information about any	(or countries) in which	To comply with our	Information
sanctions or restrictions	you have worked.	legal obligations	shared with
and/or any circumstances		including those	relevant
impacting your suitability to		contained in the	managers and
teach †		statutory guidance for	HR personnel
		schools: Keeping	F



		ChildrenSafeinEducation (KCSIE).Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	Information shared with DBS and other regulatory authorities as required
Information regarding your	From you, from your	Legitimate interest: to	To make an
academic and professional	education provider,	verify the qualifications	informed
qualifications †	from the relevant	information provided by	recruitment
	professional body.	you.	decision.
		To comply with our legal obligations.	
Information regarding your	From the Disclosure	To perform the	To make an
criminal record, in criminal	and Barring Service	employment contract	informed
records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended and, where appropriate, overseas	(DBS). From overseas jurisdictions in accordance with Home Office guidance. In respect of agency	To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or	recruitment decision To carry out statutory checks Information shared with DBS and other
criminal records checks †	and third-party staff (supply staff), from any agency or third party organisation.	detecting unlawful acts, and protecting the public against	regulatory authorities as required



	In respect of fee-	dishonesty)	For further
	funded trainee		information, see
	teachers, from the		* below
	initial teacher training		
	provider.		
Your nationality and	From you and, where	To enter into/perform	To carry out
immigration status and	necessary, the Home	the employment	right to work
information from related	Office	contract	checks
documents, such as your		To comply with our	Information mark
passport or other		To comply with our	Information may
identification and		legal obligations	be shared with
immigration information †		Legitimate interest: to	the Home Office
		maintain employment	
		records	
A copy of your driving	From you	To enter into/perform	To make an
licence †		the employment	informed
		contract	recruitment
			decision
		To comply with our	
		legal obligations	To ensure that
			you have a
		To comply with the	clean driving
		terms of our insurance	licence
			Information may
			be shared with
			our insurer



You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '†' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our recruitment of ex-offenders policy, available from the Bursar, Mrs Sherlock.