

## 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

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#### **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 employees or those applying to join the school. 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

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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.

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 <a href="mailto:SSherlock@pitsfordschool.com">SSherlock@pitsfordschool.com</a>, 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 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

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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 <a href="https://ico.org.uk/concerns/">https://ico.org.uk/concerns/</a> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

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# 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 | From you              | Legitimate interest: to carry out a fair recruitment process  | To enable HR personnel or the manager of the relevant  |
| (i.e. current address, home and mobile phone numbers, email address)  |                       | Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages | 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)   | Logitimo eta iletarra eta ta  | decision   |
| and working hours) and  |                       | Legitimate interest: to make an informed  | Both the person  |

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|                               | T                      | T ,                       | 1                  |
|-------------------------------|------------------------|---------------------------|--------------------|
| interests                     |                        | decision to shortlist for | making the         |
|                               |                        | 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        |
|                               |                        |                           | 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        |
| unrough online scarones       | social media platform. | safeguarding due          | decision.          |
|                               | 300iai media piatioim. | diligence.                | decision.          |
|                               |                        | diligerice.               | 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    |

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relevant) to recruit. process, may share any To comply with our relevant legal obligations information including those related to contained in the suitability with statutory guidance for the individuals schools: Keeping who will be Children Safe in interviewing. Education (KCSIE). 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

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|   |                      |                           | 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          |
| D. C. H. C. |                      |                           |                  |
| 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.     |
|   |                      |                           |                  |

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| Criminal Record Information | From your self-  | Legitimate interests: to  | To make an               |
|-----------------------------|------------------|---------------------------|--------------------------|
| or information that would   | declaration form | carry out a fair          | informed                 |
| make you unsuitable to work |                  | 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          |
|                             |                  | To comply with our        | the School.              |
|                             |                  | legal obligations         | To comply with           |
|                             |                  | including those           | legal/regulatory         |
|                             |                  | contained in the          | obligations              |
|                             |                  | statutory guidance for    | Can foundle an           |
|                             |                  | schools: Keeping          | For further              |
|                             |                  | Children Safe in          | information, see * below |
|                             |                  | Education (KCSIE).        | " below                  |
|                             |                  | For reasons of            |                          |
|                             |                  | substantial public        |                          |
|                             |                  | interest (preventing or   |                          |
|                             |                  | detecting unlawful acts,  |                          |
|                             |                  | and protecting the        |                          |
|                             |                  | public against            |                          |
|                             |                  | dishonesty)               |                          |
|                             |                  |                           |                          |

Table 2: Before making a final decision to recruit

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# Pitsford School

| 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                          | ······································ | 400.0.0.                 | you              |
| 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                         |  | statutory guidance for   |                  |
| recent post, and facts of any                     |  | schools: Keeping         | Information      |
| substantiated safeguarding                        |  | Children Safe in         | shared with      |
|   |  | Education (KCSIE).       | relevant         |
| concerns/allegations that meet the harm threshold |  |                          | managers and     |
|   |  | Legitimate interests: to | HR personnel     |
| under the statutory guidance                      |  | maintain employment      |                  |
| "Keeping Children Safe in                         |  | records and to comply    |                  |
| Education" (KCSIE), from                          |  | with legal, regulatory   |                  |
| references obtained about                         |  | and governance           |                  |
| you from previous employers                       |  | obligations and good     |                  |
| and/or education providers. †                     |  | employment practice      |                  |
| 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                         |  | decision to rectuit      | Obligations      |
| sanctions or restrictions                         | (or countries) in which                | To comply with our       | Information      |
|   | you have worked.                       | legal obligations        | shared with      |
| and/or any circumstances                          |  | including those          | relevant         |
| impacting your suitability to                     |  | contained in the         | managers and     |

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| teach †  |  | statutory guidance for schools: Keeping Children Safe in                           | HR personnel                                |
|--|--|--|---|
|  |  | Education (KCSIE).   | shared with DBS and other                   |
|  |  | Legitimate interests: to maintain employment                                       | regulatory authorities as                   |
|  |  | records and to comply  | required                                    |
|  |  | with legal, regulatory   |   |
|  |  | and governance   |   |
|  |  | obligations and good   |   |
|  |  | employment practice  |   |
| 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) | (DBS). From overseas   | To comply with our legal obligations   | recruitment<br>decision                     |
| in accordance with the Rehabilitation of Offenders                             | jurisdictions in accordance with Home                        | Legitimate interest:   | To carry out statutory checks               |
| Act 1974 (Exceptions) Order 1975 (as amended and, where appropriate, overseas  | Office guidance.  In respect of agency and third-party staff | For reasons of substantial public interest (preventing or detecting unlawful acts, | Information<br>shared with<br>DBS and other |
| criminal records checks †  | (supply staff), from any                                     | and protecting the   | regulatory                                  |

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|                           | 1                        | T                       | 1 11 111         |
|---------------------------|--------------------------|-------------------------|------------------|
|                           | agency or third party    | public against          | authorities as   |
|                           | organisation.            | dishonesty)             | required         |
|                           | In respect of fee-       |                         | 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   |                          |                         |                  |
| 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      |
|                           |                          | To comply with our      | decision         |
|                           |                          | legal obligations       | To ensure that   |
|                           |                          | logal obligations       | you have a       |
|                           |                          | To comply with the      | clean driving    |
|                           |                          | terms of our insurance  | licence          |
|                           |                          |                         |                  |
|                           |                          |                         | Information may  |
|                           |                          |                         | be shared with   |
|                           |                          |                         | our insurer      |
|                           |                          |                         | ļ                |

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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.

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