THORPE HALL
SCHOOL

# RECRUITMENT PRIVACY NOTICE

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.

## 1. Who collects the information

Thorpe Hall School ('the School') is a 'controller' and gathers and uses certain information about you. The School's contact details are as follows:

Thorpe Hall School
Wakering Road
Southend-on-Sea
SS1 3RD
Tel: 01702 582340
sec@thorpehall.southend.sch.uk

## 2. Data protection principles

We will comply with the data protection principles when gathering and using personal information, as set out in 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.

## 3. About the information we collect and hold

The table in Part 1 of the Schedule 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.

The table in Part 2 of the Schedule below summarises the additional information we collect before making a final decision to recruit, ie 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.

**4. 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 by third party agencies, service providers and representatives.

**5. 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 twelve 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 clear business 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, and once the twelve month period set out above comes to an end, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the Staff 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 Retention Policy.

**6. Your DATA rights to correct and access your information and to ask for it to be erased**

Please contact our IT Systems Manager, Mr Goudie, who can be contacted as detailed under 1 above 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 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 Compliance Officer, Mrs Hargreaves will provide you with further information about your data rights, if you ask for it. You may also want to read the Staff Privacy Notice which provides more detail on this.

**7. Keeping your personal information secure**

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

## 8. How to complain

We hope that our IT Systems Manager or Compliance Officer 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**

**Part 1. - Up to and including the shortlisting stage**

| The information we collect | How we collect the information | Why we collect the information | How we use 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<br><br>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<br><br>To inform the relevant manager or department of your application |
| **Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests** | From you, in the completed application form and interview notes (if relevant) | Legitimate interest: to carry out a fair recruitment process<br><br>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit | To make an informed recruitment decision<br><br>Both the person making the shortlisting decision and, if you are invited for interview, the interviewer will receive these details. |
| **Information about you that is publicly available online through online searches** | From standard online searches using a web browser, website, or social media platform. | Legitimate interest: to form part of the school's wider safeguarding due diligence.<br>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.<br>To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE). | To make an informed recruitment decision.<br>The member of staff carrying out the search, if not involved in the decision-making process, may share any relevant information related to suitability with the individuals who will be 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).<br>Search results will be reviewed and, if appropriate, explored with the applicant at interview.<br>To comply with legal/regulatory obligations.<br>For further information, see * below |

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| **Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs** | From you, in a completed anonymised equal opportunities monitoring form | To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment) | To comply with our equal opportunities monitoring obligations and to follow our equality and other policies<br><br>For further information, see ***** below |
| **Details of your referees** | From your completed application form | Legitimate interest: to carry out a fair recruitment process<br><br>In the regulated sector, to comply with our legal obligations to request references | To carry out a fair recruitment process<br><br>To comply with legal/regulatory obligations<br><br>Information shared with relevant managers, HR personnel and the referee |
| **Criminal Record Information or information that would make you unsuitable to work with children** | From your self-declaration form | Legitimate interests: to carry out a fair recruitment process including giving candidates the opportunity to discuss their disclosure with the School before a DBS check is obtained.<br><br>To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE).<br><br>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty) | To make an informed recruitment decision and given candidates the opportunity to discuss their disclosure with the School.<br><br>To comply with legal/regulatory obligations<br><br>For further information, see * below |

**Part 2. - Before making a final decision to recruit**

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

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| **professional qualifications** | the relevant professional body | information provided by you<br><br>To comply with our legal obligations | |
| **Information regarding your criminal record, in criminal 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 criminal records checks** | From the Disclosure and Barring Service (DBS)<br>From overseas jurisdictions in accordance with Home Office guidance<br>In respect of agency and third-party staff (supply staff), from any agency or third party organisation<br>In respect of fee-funded trainee teachers, from the initial teacher training provider | To perform the employment contract<br><br>To comply with our legal obligations<br>Legitimate interest:<br><br>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty) | To make an informed recruitment decision<br><br>To carry out statutory checks<br><br>Information shared with DBS and other regulatory authorities as required<br><br>For further information, see ***** below |
| **Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information** | From you and, where necessary, the Home Office | To enter into/perform the employment contract<br><br>To comply with our legal obligations<br><br>Legitimate interest: to maintain employment records | To carry out right to work checks<br><br>Information may be shared with the Home Office |
| **Information regarding your health, including your medical history, present health status and any workplace adjustments required** | From you, including via a health questionnaire and medical examination | To comply with our legal obligations including those contained in the Equality Act 2010 and statutory guidance for schools: *Keeping Children Safe in Education* (KCSIE) | To make an informed recruitment decision<br>To comply with legal/regulatory obligations including considering adjustments necessary to enable you to perform the role for which you have applied<br>Information shared with the School's medical advisers including the School doctor and occupational health adviser |

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| | | | Information shared with medical adviser carrying out your medical examination |
| **(If Applicable to the role)**<br><br>**A copy of your driving licence** | From you | To enter into/perform the employment contract<br><br>To comply with our legal obligations<br><br>To comply with the terms of our insurance | To make an informed recruitment decision<br><br>To ensure that you have a clean driving licence<br><br>Information may be shared with our insurer |

***** Further details on how we handle sensitive personal information and information are set out in our Data Protection Policy available upon request or via the staff HR portal.