



# RECRUITMENT PRIVACY NOTICE

<b>Policy Owner</b> Human Resources	<b>Applies to</b> Prior Park Schools (Trust wide)	<b>Superseded documents</b> Recruitment Privacy Notice 2018
<b>Associated documents</b> GDPR Data Protection policy Retention and Destruction Policy Data Processing Agreement Privacy Impact Assessment	<b>Review frequency</b> Every year (unless the legislation/regulations update before this time) <b>Implementation date</b> 1 September 2019	<b>Legal Framework</b> General Data Protection Regulations Data Protection Act (DPA) 2018



## Introduction

This notice is correct as at October 2019 and is written in line with the General Data Protection Regulation (GDPR) of May 2018. This notice supersedes any previous Data Protection statements or policies.

Prior Park Schools (PPS) comprises three schools. Two of those schools, Prior Park College and The Paragon School are incorporated in England as Prior Park Educational Trust Ltd (PPET). The third school, Prior Park School Gibraltar, is incorporated in Gibraltar as Prior Park School Ltd. Both are companies limited by guarantee and registered charities.

### 1. General Statement of PPET Duties

1.1 Prior Park Educational Trust (PPET) is committed to responsible data processing in accordance with its legal obligations under the General Data Protection Regulation of May 2018. Prior Park Educational Trust is committed to ensuring that any personal data we hold about you is protected in accordance with data protection laws and is stored and used in line with your expectations.

1.2 PPET is required to process relevant personal data regarding pupils, their parents or guardians and members of staff as part of its operation and shall take all reasonable steps to do so in accordance with this policy. Processing may include obtaining, recording, holding, disclosing, destroying or otherwise using data.

### 2. Data Protection Officer

2.1 PPET has appointed a Data Protection Compliance Lead to oversee all three schools:

- Prior Park College: Business Director
- The Paragon: Business Director
- Prior Park School, Gibraltar: Business Director

2.2 The Data Protection Compliance Lead will endeavour to ensure that all personal data is processed in compliance with this policy and the Principles of the General Data Protection Regulation of May 2018.

2.3 Details of the processing of data can be found in the entry in the Register of Data Controllers (no: Z6476375) and Gibraltar Regulatory Authority.

In the course of our recruitment process, we will collect, use and hold (“process”) personal data relating to you as an applicant. This makes the school a data controller of your personal information, and this Privacy Notice sets out how we will use that information and what your rights are. This Recruitment Privacy Notice explains how the school collects, uses and shares (or “processes”) personal data of applicants, and your rights in relation to the personal data we hold.

### 3. Who this document applies to

Anyone who expresses an interest in, or who applies for, employment at Prior Park Educational Trust.

Please note that any references to “employment”, “staff” etc. in this Notice are not intended to imply or confer any employment rights on you if you are a contractor, non-employed worker, or job applicant, even if the Notice is relevant to how we process your personal data.



If you succeed in your application and take up employment with us, the information you provide during the application process will be used in the administration of your employment. Further information relating to the processing and storage of your data once you are employed by us can be found in the school's Staff Privacy Notice.

## 4. How we collect your information

Information will be collected:

- from you directly when you apply for a job with us. We may also collect information from a recruitment or contract agency if you have applied for a job with us through a third party. This could be through the following methods:
- from information you provide to us during the application process (e.g. via application forms, CVs, covering letters, emails and notes taken during telephone conversations);
- from information you provide to us during interviews;
- from third parties, for example the Disclosure and Barring Service (DBS), barred lists and referees (including your previous or current employers or school), or (if you are a contractor or a substitute) your own employer or agent, in order to verify details about you and/or your application to work for us and to verify your eligibility to work in the setting.

In providing us with personal information, you are giving us consent to use the information as detailed in this Recruitment Privacy Policy. All data obtained via a third party will be collected lawfully.

During the application process, it is your responsibility to ensure that all information we hold about you is current and correct, and to inform us of any changes in a timely manner. Failure to do so could result in the withdrawal of any offers of employment that might be offered to you.

## 5. The types of information we collect

We will only collect information from you that is relevant to the particular role for which you are applying. This information will be used to shortlist candidates for interview and make decisions regarding whether candidates are successful in their applications for employment with us.

During the application process, we may collect the following types of personal data about you:

- contact, communications, and identity information, including:
- your contact details (including email address(es), telephone numbers and postal address(es);
- identity documents (e.g. passport, driving licence, utility bill) - copies of these are collected when you attend an interview with us to confirm your identity and are held on file in line with statutory guidelines.
- records of communications and interactions we have had with you;
- biographical, educational and social information, relevant to your application for employment or to confirm your identity including:
- your name, title, nationality (to verify your right to work in the UK) and date of birth;
- your image and likeness, including as captured in photographs;
- details of your education (including qualification certificates relevant to the role) and references from your institutions of study;



- your interests and extra-curricular activities;

you may choose to provide us with financial information, including:

- your current or previous salary details;
- information related to pensions, national insurance, or employee benefit schemes;

work related information, including:

- details of your work history and references from your previous employer(s);
- details of your professional activities and interests;
- your involvement with and membership of sector bodies and professional associations;
- details of any gaps in your career history since leaving school or university;
- and any other information relevant to your employment or other engagement to work for the school.

Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data, and information about criminal convictions and offences, including:

- information revealing your racial or ethnic origin (for the purposes of Equal Opportunities Monitoring);
- trade union membership, where applicable;
- information concerning your health and medical conditions (for example, where required to understand previous sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment);
- information about certain criminal convictions (for example, where this is necessary for due diligence purposes, or compliance with our legal and regulatory obligations);

However, this will only be undertaken where and to the extent it is necessary for a lawful purpose in connection with your employment or other engagement to work for the school.

## **6. Why do we collect personal data about you?**

We collect personal data about you during our recruitment process to enable us to assess your suitability to work for us. Any information requested will solely be used for recruitment purposes. The information we collect is tailored to meet the needs of the role you are undertaking. We also collect information in order to follow safeguarding requirements relating to the children in our care, and to follow all necessary legal and statutory requirements. In this respect, depending on your role and status, we are likely to use your personal data for the following purposes:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, including by checking references in relation to your education and your employment history and undertaking third party checks (e.g. Disclosure and Barring Service checks) in line with statutory requirements.
- We process your personal data because it is necessary for our (or sometimes a third party's) legitimate interests. Our "legitimate interests" include our interests in running the school in a professional, sustainable manner, in accordance with all relevant ethical, educational, charitable, legal and regulatory duties and requirements (whether or not connected directly to data protection law).



- We also process your personal data for our compliance with our legal obligations, notably those in connection with employment law and child welfare. In this respect, depending on your role and status, we may also use your personal data for the following: for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

## 7. Sharing your information with others

For the purposes of recruitment as referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. We may disclose limited personal data (including in limited cases special category or criminal data) to a variety of recipients including:

- DBS and other relevant authorities and agencies such as the Department for Education, TRA, the ICO, Charity Commission and the local authority;
- other schools in the Prior Park Educational Trust/Prior Park Schools group;
- external auditors or inspectors;
- our advisers where it is necessary for us to obtain their advice or assistance, including insurers, lawyers, accountants, or other external consultants;
- when the school is legally required to do so (by a court order, government body, law enforcement agency or other authority of competent jurisdiction), for example HM Revenue and Customs or the police.

## 8. How we store your information

Prior Park Educational Trust is committed to the safe and secure storage of all data and information provided to us by staff members. Personal information may be held and stored in the following ways:

- As paper copies held in files in secure locked storage
- As password protected electronic copies (please see the IT Code of Conduct for further information).

Personal information will not be shared with others, except in the circumstances outlined above, without your consent.

Further information about the measures we use to protect Personal Data is available from our Data Protection Compliance Lead.

## 9. How long your information is kept

Personal data relating to unsuccessful job applicants is deleted 6 months from the end of the application process, except where we have notified you that we intend to keep it for longer (and you have not objected).

For unsuccessful candidates, documents confirming your identity that are required at interview will be destroyed immediately following the end of the recruitment process, except where we have notified you that we intend to keep it for longer (and you have not objected).

Unsuccessful job applicants have the right to request that any personal information held by us is deleted / destroyed sooner than the 6-month period as set out above. In this circumstance, data will be deleted / securely destroyed within one month of your request, in line with GDPR guidelines.



## 10. Your rights

You have the following rights:

- to obtain access to, and copies of, the personal data that we hold about you;
- to require us to correct the personal data we hold about you if it is incorrect;
- to require us (in certain circumstances) to erase your personal data;
- to request that we restrict our data processing activities (and, where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal);
- to object, on grounds relating to your particular situation, to any of our particular processing activities where you feel this has a disproportionate impact on your rights.
- to expect that we will notify you in the case of any breach in the processing of your data as set out in this document.

It is important to note that references received in confidence may not be accessible under your GDPR rights.

Please also note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. The school will endeavour to respond to any such requests within the statutory one-month time-limit.

If you wish to exercise your rights as detailed above, you should contact us by email ([recruitment@priorparkschools.com](mailto:recruitment@priorparkschools.com)).

## 11. This notice

The school will review this Recruitment Privacy Notice on an annual basis and will update this policy from time to time. An up to date copy of this Privacy Notice will always be available on our website. You may request an up to date copy of this notice at any time.

## 12. Contact and complaints

If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact your line manager / refer the matter through the staff grievance procedure.

If you are not satisfied with how we are processing your personal data, or how we deal with your complaint, you can make a complaint to the Information Commissioner: [www.ico.org.uk](http://www.ico.org.uk). The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral.