

# ST CHRISTOPHER'S SCHOOL & NURSERY (Including EYFS and Before and After-School Care)

# **RECRUITMENT PRIVACY NOTICE**

### Data protection privacy notice (recruitment)

As part of the staff recruitment process for St Christopher's School ("the School"), the School will collect and process personal information relating to those individual's applying for employment with the School ("applicants"). 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 pat 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.

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

St Christopher's 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:

6 Downs Road Epsom Surrey KT18 5HE

013727 21807

office@st-christophers.surrey.sch.uk

### 2. Data Protection Principles

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

#### 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 on our behalf 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 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 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.

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

Please contact our Bursar, Helen Serrano, who can be contacted via the office email office@stchristophers.surrey.sch.uk 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, 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, 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.

#### 8. How to complain

The Bursar oversees compliance with this privacy notice. We hope that our Bursar, Helen Serrano 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.

Adopted by the Governing Body

Signed	D Roberts	September 2024	
	Mr D Roberts Chair of Gove	rnors	
Signed:	<i>B Grehan</i> Mrs B Grehan Headteacher	September 2024	
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Review date:		September 2024	
Previous review date:		September 2022	
Next review da	ate:	September 2026	

### SCHEDULE ABOUT THE INFORMATION WE COLLECT AND HOLD

The information we collect Your current and any formers names, title, date of birth, gender, national insurance number and contact details (i.e. address, home and mobile phone numbers, email address)	How we collect the information From you	Why we collect the information 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	How we use and may share the information To enable the Bursar 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 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 Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision 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, websites, or social media platform.	Legitimate interest: to form part of the school's wider safeguarding due diligence. Legitimate interest: to make an informed decision to shortlist for	To make an informed recruitment decision. Search results will be reviewed and, if appropriate, explored with the applicant at interview.

## Part 1 Up to and including the shortlisting stage

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

the School before a	To comply with
DBS check is	legal/regulatory
obtained.	obligations
To comply with our	For further information,
legal obligations	see * below
including those	
contained in the	
statutory guidance for	
schools: Keeping	
Children Safe in	
Education (KCSIE).	
For reasons of	
substantial public	
interest (preventing or	
detecting unlawful	
acts, and protecting	
the public against	
dishonesty)	

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

# Part 2 Before making a final decision to recruit

circumstances impacting your	which you have	including those	managers and
suitability to teach	worked	contained in the	Bursar
	worked	statutory guidance	Dursui
		for schools:	Information
			shared with DBS
		Keeping Children	and other
		Safe in Education	regulatory
		(KCSIE).	authorities as
		Legitimate	required
		interests: to	
		maintain	
		employment	
		records and to	
		comply with legal,	
		regulatory and	
		<b>C</b>	
		governance	
		obligations and	
		good employment	
		practice	
Information regarding your	From you, from	Legitimate interest:	To make an
academic and professional	your education	to verify the	informed
qualifications 🗆	provider, from	qualifications	recruitment
	the relevant	information	decision
	professional	provided by you	
	body		
		To comply with our	
		legal obligations	
Information regarding your	From the	To perform the	To make an
criminal record, in criminal	Disclosure and	employment	informed
records certificates (CRCs) and	Barring Service	contract	recruitment
enhanced criminal records	(DBS)		decision
certificates (ECRCs) in		To comply with our	
accordance with the	From overseas	legal obligations	To carry out
Rehabilitation of Offenders Act	jurisdictions in	Legitimate interest:	statutory checks
1974 (Exceptions) Order 1975 (as	accordance with		Information
amended) and, where		For reasons of	shared with DBS
		substantial public	
	1	1	

		interest	and other
appropriate, overseas criminal	Home Office	interest	and other
records checks □	guidance	(preventing or	regulatory
	In rooport of	detecting unlawful	authorities as
	In respect of	acts, and	required
	agency and	protecting the	
	third-party staff	public against	For further
	(supply staff),	dishonesty)	information, see *
	from any agency		below
	or third party		
	organisation		
	In respect of		
	fee-funded		
	trainee		
	teachers, from		
	the initial		
	teacher training		
	provider		
Your nationality and immigration	From you and,	To enter	To carry out right
status and information from	where	into/perform the	to work checks
related documents, such as your	necessary, the	employment	
passport or other identification	Home Office	contract	Information may
and immigration information			be shared with
		To comply with our	the Home Office
		legal obligations	
		Legitimate interest:	
		-	
		to maintain	
		employment	
		records	

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked ' $\Box$ ' 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 staff privacy notice, available from the Bursar.