



# OUNDLE

School

## PRIVACY NOTICE FOR APPLICANTS

### Introduction

As part of any recruitment process, the School collects and processes personal data relating to job applicants. The School is committed to being transparent about how it collects and uses that data, and to meeting its data protection obligations.

### What is personal data?

Personal data is information that identifies you as an individual. This includes contact details, next of kin and financial information. We may also hold information such as your religion or ethnic group.

### What information does the School collect?

The School collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which the School needs to make reasonable adjustments during the recruitment process and;
- information about your entitlement to work in the UK.

### How does the School collect personal data?

The School collects this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment, including online tests.

The School will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. The School will seek information from third parties only once a job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

## How does the School use your personal data?

The School uses your personal data to administer its obligations under your employment contract and to comply with legislation where required. This includes:

- To aid selection processes e.g. to demonstrate you have the required skills or experience;
- Communication with you e.g. inviting you to attend an interview;
- To make any adjustments necessary to support you in attending interview or any other part of the recruitment process.

## Why does the School need to process your personal data in this way?

The School needs to process data to take steps at your request prior to entering into a contract with you.

The School is permitted to process your personal data in this way, in compliance with data protection legislation, by relying on one or more of the following lawful grounds:

The processing is necessary-

### - *To ensure compliance with legal and regulatory obligations*

In some cases, the School needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a candidate's entitlement to work in the UK. For all roles within the School, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role for which they are employed.

### - *For the purposes of the School's legitimate interests*

In other cases, the School has a legitimate interest in processing personal data before the commencement of an employment relationship. These legitimate interests are:

- to allow the School to maintain accurate recruitment records;
- to assess an individual's suitability for work and to determine to whom to offer employment;
- for defence against potential legal claims.

Where the School relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of applicants and has concluded that they are not.

### - *For the purposes of protecting your vital interests*

In such situations as a medical emergency, where the priority will be to get you the most appropriate help

## Who has access to your personal data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment teams, interviewers involved in the recruitment process, managers in the business area with the relevant vacancy if access to the data is necessary for the performance of their roles. It may also be shared with necessary Support Services staff, where access to the data is necessary for the performance of their roles.

The School shares your data with third parties in order to obtain pre-employment references from other employers and obtain necessary criminal records checks from the Disclosure and Barring Service.

As required, the School will also share data with professional advisers (eg lawyers, insurers, accountants); government authorities (eg the Department for Education, police, local authority) and appropriate regulatory bodies (eg the Teaching Regulation Agency, formerly the NCTL, the Independent Schools Inspectorate, the Charity Commission, the Boarding Schools Association). The School will also share data with the relevant statutory authorities in relation to any alleged safeguarding concerns.

The School will not transfer your data to countries outside the European Economic Area.

## **How does the School protect your data?**

The School takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. Paper files are retained in locked cabinets, with access limited to the HR department and interviewers involved in the recruitment process. Electronic Data is held on the School's own internal servers, with access restricted to the HR department.

Where the School engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

## **How long does the School keep your data?**

If your application for employment is unsuccessful, the organisation will hold your data on file for 6 months after the end of the relevant recruitment process. At the end of that period or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in a new privacy notice.

## **Your rights?**

As a "data subject", you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the School to change incorrect or incomplete data;
- require the School to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the School is relying on its legitimate interests as the legal ground for processing; and
- ask the School to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the School's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Bursar.

Please note – the right of access is limited to your own personal data and certain data is excluded from the right of access eg information which is subject to legal privilege.

If you have a concern about the way the School is collecting or using your personal data, we ask that you raise the concern with us (via [bursar@oundleschool.org.uk](mailto:bursar@oundleschool.org.uk)) in the first instance. Alternatively you can contact the Information Commissioner's office at <https://ico.org.uk/concerns>

### **What if you do not provide your personal data?**

You are under no statutory or contractual obligation to provide data to the organisation during the recruitment process. However, if you do not provide the information, the School may not be able to process your application properly or at all.

### **Automated decision making**

Recruitment processes are not based solely on automated decision-making.

**Data Controller: The Corporation of Oundle School, Church Street, Oundle, Peterborough  
PE8 4EE**

**Data Protection Compliance Manager: The Bursar, Oundle School.**

**Email: [bursar@oundleschool.org.uk](mailto:bursar@oundleschool.org.uk)**

**May 2018**