



## **DATA PROTECTION - PRIVACY NOTICE FOR JOB APPLICANTS**

### **1. Introduction**

This Privacy Notice explains how **Dulwich College** uses (or “processes”) the personal information (or data) of job applicants (which will include applications for voluntary roles such as a governor). This notice is provided in accordance with the rights of individuals under Data Protection Law<sup>1</sup> to understand how their data is used. Dulwich College is the data controller for the information you provide during the process, unless otherwise stated.

### **2. What will we do with the information you provide to us?**

All of the information you provide during the process will only be used for the purpose of progressing your application, or to fulfil legal or regulatory requirements if necessary.

We will use the contact details you provide to us to contact you to progress your application. We will use the other information you provide to assess your suitability for the role you have applied for.

### **3. What information do we collect and why?**

The information we ask for is set out in the paragraphs below according to the various stages in the recruitment process. We do not collect more information than we need to fulfil our stated purposes and will not retain it for longer than is necessary. We primarily process the information in accordance with our legitimate interests in order to administer your application and assess your suitability for employment but also in order to comply with our legal obligations governing the recruitment of staff (including statutory guidance: Keeping Children Safe in Education).

#### **3.1 We may share your information with third parties such as your referees and the DBS according to how far your application progresses. **Application stage****

We ask you for your personal details including name and contact details, your previous experience, education, referees and other information relevant to the role you have applied for. We will also ask you for details of your online profile such as social media handles (to be used by the College only as part of online suitability checks for shortlisted candidates).

You may also be asked to provide equal opportunities information. This is not mandatory information; if you do not provide it, it will not affect your application. Any information you do provide, will be used only to produce and monitor equal opportunities statistics.

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<sup>1</sup> The General Data Protection Regulation as retained and applied in the UK (“UK GDPR”) and Data Protection Act 2018 and all other data protection law and regulations

### **3.2 Shortlisting & Assessment**

We shortlist applications for interview. We might ask you to participate in assessment days; complete tests and/or to attend an interview, or a combination of these. Information will be generated by you and by us. For example, you might complete a written test or we might take interview notes and/or source information in the public domain, including information you may have posted to social media. This information is held by the College.

### **3.3 Employment checks**

As a school, we are required to carry out a variety of checks on new staff as part of the recruitment process. These include confirming identity, right to work in the United Kingdom and qualifications and taking up references. We are also required to carry out criminal record (DBS) and similar checks (e.g. barred list, prohibition order and childcare disqualification).

You will be required to provide various documents, including:

- Proof of your identity – you will be asked to attend our office with original documents, we will take copies.
- Proof of your qualifications – you will be asked to attend our office with original documents, we will take copies.
- Proof of your right to work in the United Kingdom.

We will contact your referees, using the details you provide in your application, directly to obtain references.

If you accept our offer of employment, we are required to check your medical fitness (which may be by seeking a medical report from your doctor or asking you to complete a medical form/declaration).

We will also ask you for your bank details (to process salary payments) and emergency contact details (so we know whom to contact if you have an accident or fall ill at work).

### **3.4 DBS Checks**

If you accept our offer of employment, we will provide your email address and other personal details to the Government's Disclosure and Barring Service or a body registered with the Disclosure and Barring Service ("DBS") who carry out DBS checks on our behalf. They will contact you to complete an application for an Enhanced Criminal Record check which is issued by the Disclosure and Barring Service.

An enhanced certificate issued by the DBS provides the following categories of information ("DBS Information"):

- Police Records of Convictions, Cautions, Reprimands and Warnings
- Information from the list held under Section 142 of the Education Act 2002
- DBS Children's Barred List Information
- DBS Adults' Barred List Information
- Other relevant information disclosed at the Chief Police Officer(s) discretion.

Our policy and practice on the handling of DBS Information is as follows:

- DBS Information is kept securely, in lockable, filing cabinets.
- Access is strictly controlled and (pursuant to Section 124 of the Police Act 1997) is limited to those who have need to see it in connection with the performance of their duties for the College.
- Approximately 6 months after a recruitment decision has been made, we securely destroy the part of the DBS certificate containing any DBS Information. We keep on file the remaining part of the DBS certificate, in order that we can prove for regulatory purposes that the necessary DBS check was carried out.
- We provide appropriate training and guidance to relevant staff regarding the handling of DBS certificates and any criminal record information therein contained. We inform them that it is a criminal offence to pass DBS Information to anyone who is not entitled to receive it.

#### **4. How long is your personal information retained for?**

If you are made an offer of employment and in due course join the College, the information you provide during the application process will be retained by us as part of your HR file. There is a separate Privacy Notice for staff, which will be made available to you when you join the College.

If you are not made (or do not accept) an offer of employment by the College, the information you have provided will be destroyed within 12 months after the end of the recruitment process, unless we think you may be suitable for another role in the future and wish to keep your details on file for that purpose (in which event your information may be kept for up to a further 2 years).

#### **5. Your rights**

Individuals have various rights under Data Protection Law to access and understand personal data about them held by the College, and in some cases ask for it to be erased or amended or have it transferred to others, or for the College to stop processing it (subject to certain exemptions and limitations).

You have the right to request that any inaccurate or out-of-date, irrelevant or inaccurate or information about you is erased or corrected (subject to certain exemptions and limitations under Data Protection Law).

The College will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event within statutory time limits (which is one month in the case of requests for access to information). The College will be better able to respond quickly to smaller, targeted requests for information. If the request for information is manifestly excessive or similar to previous requests, the College may ask you to reconsider or require a proportionate fee (but only where Data Protection Law allows it).

You should be aware that the right of access is limited to your own personal data and certain data is exempt from the right of access. This will include information which identifies other individuals, or information which is subject to professional privilege (for example, legal advice given to or sought by the College or documents prepared in connection with a legal action).

You may have heard of the “right to be forgotten” (or right of “erasure”). We will sometimes have compelling reasons to refuse specific requests to amend, delete or stop processing your personal data, for example, a legal requirement. All such requests will be considered on their own merits and on a case by case basis.

## **6. Data accuracy and security**

The College will endeavour to ensure that all personal data held in relation to you is as up to date and accurate as possible. Please notify the College of any significant changes to important information, such as contact details.

The College will take appropriate technical and organisational steps to ensure the security of personal data, including policies around use of technology and devices, and access to College systems.

## **7. Queries and complaints**

If you have any query about this Privacy Notice or believe that the College has breached Data Protection Law, please notify the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Phone: 0208 299 9306 Email: [legal@dulwich.org.uk](mailto:legal@dulwich.org.uk)

You also have the right to take any complaints about how we process your personal data to the **Information Commissioner’s Office** (ICO), whose contact details are: The Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: [www.ico.org.uk/concerns](http://www.ico.org.uk/concerns)). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation before involving the ICO.

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**Policy Owner:** Clerk to the Governors  
**Last Reviewed:** January 2023  
**Date of Next Review:** January 2025