Staff Recruitment Privacy Notice

Culford School is committed to protecting the privacy and security of your personal information.

This privacy notice describes how we collect and use personal information about you during the recruitment process, in accordance with the UK General Data Protection Regulation (UK GDPR) and applies to all candidates.

This Privacy Notice is for information only; it is not a contractual agreement.

Who collects the information

Culford 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:
Culford School Culford Bury St Edmunds Suffolk IP32 7HN
01284 728615
HR@culford.co.uk

Data protection principles

We will comply with the data protection law and 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.

What information do we collect?

In connection with your application for work with us, we will collect, store, and use the following categories of personal information about you:

- The information you have provided to us in your curriculum vitae, application form and covering letter/ and emails;
- Any information you provide to us during an recruitment process
- Information you provide during onboarding including
    - Information required to complete Right to Work in the UK and Sanctions checks;
    - DBS screening (a criminal record check)
    - Overseas Checks, where applicable

- Reference and background checks such as prior employment, regulatory body checks and certificate checks.

We will check your social media accounts or your online public profile as part of our safer recruitment checks and as required by Keeping Children Safe In Education (KCSIE)

We may also collect, store and use the following special categories of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions;
- Information about your health, including any medical condition, health and sickness records; and
- Information about your criminal record.

We may collect personal information from the following sources:

- You, the candidate;
- Recruitment agencies;
- Search consultants;
- Our employment background check provider;
- Our credit reference agency;
- Your named referees; and
- Data from third party publicly accessible sources. For example, professional memberships, publicly available information on social media or networking platforms.

When using our online application, your information will be provided to us through that portal which is securely hosted by a third party provider.

Why do we process personal data?

An offer of employment will be conditional and we will ask you for information in order to carry out pre-employment checks. We are required to confirm your identity, your right to work in the UK, required safeguarding checks for working in education, your fitness to work via a health questionnaire and to seek assurances to your professional conduct, trustworthiness and reliability.

We need to process data to take steps at your request, prior to entering into a contract with you. We also need to process your data to enter into a contract with you.

In some cases, we need to process data to ensure that we are complying with our legal and regulatory obligations. For example, we are required to check your eligibility to work in the UK before employment starts or carry out safer recruitment check before working with children.

As a School we are required to uphold public trust and confidence and adhere to regulatory obligations. We therefore have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from you allows us to manage the recruitment process, assess and confirm your suitability for employment and decide to whom to offer a job. We have also assessed, following safer recruitment guidance, that staff should be appropriately screened which includes sanctions checking. We may also need to process data from you to respond to and defend against legal claims.

All archived employment records are stored on a dedicated server in the UK. All current employment records are held in electronic and paper filing systems.

The Staff Privacy Notice on the website details how we collect and process your personal data during and after employment or volunteering at the school.

We process health information as required by under the safer recruitment guidance for school, KCSIE, to verify a candidates mental and physical fitness to carry out their work responsibilities in a school. We

process health information to identify if we need to make reasonable adjustments to the recruitment process for you. This is to carry out our obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

We carry out a criminal records check in order to satisfy ourselves that there is nothing in your criminal convictions history which makes you unsuitable for the role at the school. We use a third party to do this on our behalf.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to data?

Your information will be shared internally for the purposes of the recruitment exercise. This may include members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the business area with a vacancy, and IT staff if access to the data is necessary for the performance of their roles.

If you make an application through our online application via the website, your data is also held within that third party system. The third party provider does not have direct access to your data but there may be limited occasions where, in order to investigate a support ticket, the supplier may need to be granted access.

We will not share your data with other third parties, unless your application for employment is successful, we make you an offer of employment or you have given permission before the interview process to contact your previous employer. We will then share your data with former employers to obtain references for you, our employment background check provider to obtain necessary background checks, including a criminal record check and our credit reference agency where applicable. All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies.

The School uses a third party service provider Atlantic Data Ltd. to carry out Disclosure and Barring Services Checks (DBS). This is only carried out with your permission and you will interact directly with Atlantic Data to provide your personal information for the purpose of processing the DBS check. It is a condition of employment that all staff have a successful DBS check.

For further details on other third party contractors used during the recruitment process, please contact the HR Department at HR@culford.co.uk

How do we protect data?

We take the security of your data seriously. We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

AI in Recruitment

Applicants for any vacancy are entitled to use AI to support their research and assist in their own creation of a response to any application questions. However, all responses must be accurate and the final work of the applicant and not simply copied from AI or any other source. Applications that have used AI to complete an entire submission or part thereof will be rejected.

Transfers outside of the UK or EEA

We do not envisage transferring the personal information we collect about you outside the EU during the recruitment process.

If we ever do need to transfer your data outside of the UK or EEA, to ensure that your personal information does receive an adequate level of protection, we will make sure that that there is an adequacy decision in respect of that country or will verify/put in place appropriate measures to ensure that your personal information is treated by those third parties in a way that is consistent with and which respects the UK laws on data protection. Further details of this can be requested using the contact details below.

For how long do we keep data?

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.

If your application for employment is unsuccessful, we will hold your data on file for 12 months after the end of the relevant recruitment process. After this period, we will securely destroy your personal information in accordance with our data retention policy.

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. You are free to withdraw your consent at any time by contacting our HR Department.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file. The periods for which your data will be held will be provided to you in our Staff 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 us to change incorrect or incomplete data;
- require us 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 we are relying on our legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the Compliance Office at compliance@culford.co.uk

Responsibility for Data Protection

The School has appointed the Head of Compliance as the Data Protection Lead who will deal with your requests and enquiries concerning the School's processing of your personal data (see section on Your Rights above) and endeavour to ensure that all personal data is processed in compliance with this policy and data protection law. You can contact the School's Head of Compliance using these details:

The Head of Compliance, Culford School, Culford, Bury St Edmunds, Suffolk, IP28 6TX or email Compliance@culford.co.uk

What if you do not provide personal data?

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

If your application is successful, to cover our obligations under legislation and for legitimate business reasons it will be a condition of your contract that you complete satisfactory background checks.

You may be asked to provide information for equal opportunities monitoring purposes but there are no consequences for your application if you choose not to provide such information.

Automated decision-making

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

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time.

Data Protection Complaints

If you believe that we have broken your data protection or privacy rights, or you are unhappy with how the school has managed your data, you can complain to us direct by contacting the Compliance Office Compliance@culford.co.uk. Culford School's Data Protection Complaints Policy has further information about the complaints process.

If you are not happy with our response, or you want to contact the UK Information Commissioner's Office, which regulates and enforces data protection law in the UK, you can find details about how to do this at www.ico.org.uk.

If you have any questions about this privacy notice, please contact the Compliance Office on the details above.