



**DATA PROTECTION PRIVACY NOTICE
(RECRUITMENT)**

Responsible person:	Bursar
Last reviewed:	September 2022
Next review due:	September 2023

Introduction

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 College, including positions as a member of staff (full time or part 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 Columba's College and Preparatory School (the College) is the Data Controller which means that the College is the organisation which is in charge of your personal information.

The postal address of the College is:

St Columba's College,
8-10 King Harry Lane,
St Albans,
Hertfordshire,
AL3 4AW.

If you want to contact us about your personal information, you can contact our Data Protection Lead, the Bursar, in writing or by contacting the Bursar's PA by email at bursarpa@stcolumbascollege.org.

2. Data protection principles

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

About the information we collect and hold

The table in 0 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 0 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, 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.

3. Where information may be held

Information may be held on College premises in our filing systems and on our servers. It may also be held by third party agencies, service providers and representatives.

4. 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 College. If there is a clear business 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, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the Staff Privacy Notice.

Further details on our approach to information retention and destruction are available in our Storage and Retention of Records Policy.

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

The Data Protection Lead, is the Bursar, who can be contacted in writing by emailing the Bursar's PA, at bursarpa@stcolumbascollege.org (as detailed under section 1 above) 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 the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances.

6. 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. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine business 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.

7. Contact, queries 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 be contacting the Data Protection Lead in writing.

If you are not satisfied with how we are processing your personal data, or if you believe that the College has not complied with this policy or acted otherwise than in accordance with Data Protection Law, you should utilise the College complaints

procedure and should also notify the Data Protection Lead. You can also make a referral to or lodge a complaint with the Information Commissioner's Office (ICO) www.ico.org.uk, although the ICO recommends that steps are taken to resolve the matter with the College before involving the regulator. The address of the ICO is:

Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire,
SK9 5AF

Any comments or queries on this policy should be directed to the Data Protection Lead.

SCHEDULE

About the information we collect and hold

Part 1 - Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Your name and contact details</p> <p>(ie address, home and mobile phone numbers, email address)</p>	<p>From you, in the completed application form and interview notes</p> <p>(if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable HR personnel or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant manager and / or College Leadership team of your application</p>
<p>Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests</p>	<p>From you, in the completed application form and interview notes</p> <p>(if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>Both the person(s) making the shortlisting decision and, if you are invited for interview, the interviewer(s) will receive these details.</p>
<p>Your name, contact details and details of your qualifications, experience, employment history and interests</p>	<p>From you, in the completed application form and interview notes</p> <p>(if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest</p>	<p>To make an informed recruitment decision</p> <p>Both the person(s) making the shortlisting decision and, if you are invited for interview, the interviewer(s) will receive these details.</p>

Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunity monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process In the regulated sector, to comply with our legal obligations to request references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee

Part 2 - Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To obtain the relevant reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel

Information regarding your academic and professional qualifications	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended)	From the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
A copy of your driving licence	From you	To comply with the terms of our insurance to Drive College vehicles	Information may be shared with our insurer
Information relating to your activities on social media	From you From a search of data publicly held on websites such as Google, Facebook, Linked-In, Etc	To comply with paragraph 221 of Keeping Children Safe in Education (KCSIE) 2023	Information will be shared with the Chair of the Interview Panel

You are required (by law or in order to enter into your contract of employment) to provide the categories of information in Part 2 of the Schedule above to us to enable us to verify your right to work and suitability for the position.