Privacy Notice
How we use Job Applicants' Information

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals applying for roles at our school.

St Mary's Catholic Primary School is the 'Data controller' for the purposes of data protection law.

We have appointed Grow Education Partners Ltd as our data protection officer (DPO) and the responsible contact is David Coy (see 'Contact us' below).

Successful candidates will also need to refer to our privacy notice for the school workforce for information about how their personal data is collected, stored and used once they join the school.

1. The Personal Data we process.
   Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to:
   - Personal information (such as name, date of birth, national insurance number)
   - Contact details and preferences (such as telephone number, email address, postal address)
   - Copies of right to work documentation
   - References
   - Evidence of qualifications
   - Employment records (such as work history, job titles, training records and professional memberships)
   - Information from pre-employment background checks (such as criminal record, online search)
   - Closed- circuit television (CCTV) Images
   - Protected characteristics (such as race, ethnicity, religious beliefs, sexual orientation)
   - Relevant medical information (such as disability and access requirements).

We may also hold personal data about you from third parties, such as references supplied by former employers or service users, information provided during the completion of our

pre-employment checks, and from the Disclosure & Barring Service, in order to comply with our legal obligations and statutory guidance.

A full breakdown of the data we collect on Job Applicants can be requested by contacting the school office (info@st-charles.rbkc.sch.uk)

2. Why we process this data

The purpose of collecting and processing this data includes but is not limited to:

- Staff recruitment and ensuring we have all the necessary information to enter into a contract with you
- Fulfilling our legal obligations, for example to check a successful applicant's eligibility to work in the UK before employment starts
- Enabling us to establish relevant experience and qualifications
- Facilitating safer recruitment, as part of our safeguarding obligations towards pupils
- Enabling equalities monitoring
- Ensuring that appropriate access arrangements can be provided for candidates that require them.

3. Our lawful basis for processing this data

This section contains information about the legal basis that we are relying on when handling your information. These are defined under data protection legislation and for personally identifiable information are:

- You have given consent for one or more specific purposes
- Processing is necessary to fulfil a contract or to take specific steps before entering into a contract
- Processing is necessary to comply with the school's legal obligations
- Processing is necessary to protect your vital interests
- Processing is necessary for tasks in the public interest or exercise of authority vested in the controller (the provision of education).

When we process special category information, which is deemed to be more sensitive, the following lawful basis are used:

- You have given explicit consent
- It is necessary to fulfil the school's obligations or your obligations
- It is necessary to protect your vital interests
- Processing is carried out by a foundation or not-for-profit organisation (includes religious, political or philosophical organisations and trade unions)
- Reasons of public interest in the area of public health.

Where we have obtained consent to use personal data, this consent can be withdrawn at any time. We will make this clear when we ask for consent and explain how consent can be withdrawn.

4. Collecting this data.

While the majority of information we collect about you is mandatory, some information can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether providing it is mandatory or optional. If it is mandatory, we will explain the possible consequences of not complying.

5. How we store this data

Personal data we collect as part of the job application process is stored in line with our Data Protection Policy.

When it is no longer required, we will delete your information in accordance with our Data Retention policy. The Data Retention policy can be requested from the school office (info@st-marys.rbkc.sch.uk)

6. Unsuccessful Candidates

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, your data is deleted or destroyed.

7. Who we share this data with.

In order for us to legally, effectively and efficiently function we are required to share data with appropriate third parties, including but not limited to:

- Former employers – to obtain references
- Employment background check providers- to obtain necessary background checks
- Our auditors- to ensure our compliance with our legal obligations
- Our local authority – to meet our legal obligations to share certain information with it, such as shortlists of candidates for a headteacher position
- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support
- Professional advisers and consultants
- Employment and recruitment agencies.

8. Transferring data internationally

We may send your information to other countries when:

- we or a company we work with store information on computer servers based overseas; or
- we communicate with you when you are overseas.

We conduct due diligence on the companies we share data with and note whether they process data in the UK, EEA (which means the European Union, Liechtenstein, Norway and Iceland) or outside of the EEA.

The UK and countries in the EEA are obliged to adhere to the requirements of the GDPR and have equivalent legislation which confer the same level of protection to your personal data.

For organisations who process data outside the UK and EEA we will assess the circumstances of how this occurs and ensure there is no undue risk.
Additionally, we will assess if there are adequate legal provisions in place to transfer data outside of the UK.

9. Data Protection Rights

Individuals have a right to make a 'subject access request' to gain access to personal information that the school holds about them.
If you make a subject access request, and if we do hold information about you, we can:

- Give you a description of it
- Tell you why we are holding and processing it, and how long we will keep it for

- Explain where we got it from, if not from you
- Tell you who it has been, or will be, shared with
- Let you know whether any automated decision-making is being applied to the data, and any consequences of this
- NOT provide information where it compromises the privacy of others
- Give you a copy of the information in an intelligible form.

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.
In most cases, we will respond to subject access requests within 1 month, as required under data protection legislation However, we are able to extend this period by up to 2 months for complex requests or exceptional circumstances.

Your other rights regarding your data:
You may:

- Withdraw your consent to processing at any time (This only relates to data for which the school relies on consent as a lawful basis for processing)
- Ask us to rectify, erase or restrict processing of your personal data, or object to the processing of it in certain circumstances and where sufficient supporting evidence is supplied
- Prevent the use of your personal data for direct marketing
- Challenge processing which has been justified on the basis of public interest, official authority or legitimate interests.
- Request a copy of agreements under which your personal data is transferred outside of the United Kingdom.
- Object to decisions based solely on automated decision making or profiling (decisions taken with no human involvement, that might negatively affect you)
- Request a cease to any processing that is likely to cause damage or distress
- Be notified of a data breach in certain circumstances
- Refer a complaint to the ICO
- Ask for your personal data to be transferred to a third party in a structured, commonly used and machine-readable format (in certain circumstances).

The School will comply with the data protection legislation in regard to dealing with all data requests submitted in any format, individuals are asked to preferably submit their request in written format to assist with comprehension.

Requests should include:

- Name of individual
- Correspondence address
- Contact number and email address
- Details of the request

If you would like to exercise any of the rights or requests listed above, please contact Claire Browne

- Email: claire.browne@st-marys.rbkc.sch.uk
- Phone: 020 8969 0321
- Post: St Mary's Catholic Primary School, East Row, London W10 5AW

We reserve the right to verify the requesters' identity by asking for Photo ID. If this proves insufficient, then further ID may be required.

Article 22 of the UK GDPR has additional rules to protect individuals from decisions made solely for the purpose of automated decision-making and profiling. The school does not carry out any automated decision-making and/or profiling on the workforce.

10. Data Protection Breaches

If you suspect that your or someone else's data has been subject to unauthorised or unlawful processing, accidental loss, destruction or damage, we ask that you please Frederick Fowle (Assistant Head) at St Charles Catholic Primary School and advise us without undue delay.

11. Complaints

We take any complaints about our collection and use of personal information very seriously.
If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

To make a complaint, please contact

- Email: claire.browne@st-marys.rbkc.sch.uk
- Phone: 020 8969 0321
- Post: St Mary's Catholic Primary School, East Row, London W10 5AW

This complaint may be assessed by our independent Data Protection Officer, David Coy (contactable on david.coy@london.anglican.org, 020 3837 5145), with a final response provided within 30 days.

If you are unhappy with the school's final response you can refer the matter to the Information Commissioner's Office:

- Report a concern online at https://ico.org.uk/concerns/
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

12. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact either our School Data Protection Lead, Kathryn Cooper-Weir (Assistant Head) at St Mary's Catholic Primary School or our independent Data Protection Officer, David Coy (contactable on david.coy@london.anglican.org, 020 3837 5145).

13. Changes to this Privacy Notice.

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.