



PRIVACY NOTICE RECRUITMENT

GENERAL

As part of the Schools recruitment process Langley School (1960) Ltd, 'the School' collects and processes personal data relating to job applicants. We are committed to being transparent about how we collect and use that data and to meeting our data protection obligations.

This notice is to help you understand how and why we collect personal information about you and what we do with that information during and after the recruitment process. It also explains the decisions that you can make about your own information.

If you have any questions about this notice, please contact the Information Governance Management Organisation (IGMO) Committee via headmasterspa@langleyschool.co.uk

WHAT IS PERSONAL INFORMATION?

Personal information is information that identifies you as an individual and relates to you.

This includes your name, contact details, date of birth. We may also hold information such as medical information, your religion or ethnic group. CCTV, photos and video recordings of you are also personal information.

WHAT INFORMATION DOES THE SCHOOL COLLECT DURING THE RECRUITMENT PROCESS?

We collect a range of information about you, including:

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

The School collects this information in a variety of ways. For example, data is collected via application forms or CV's.

The School also collect data at the point of job offer, 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).



WHY DOES THE SCHOOL PROCESS PERSONAL DATA?

The School needs to process data to take steps to entering into a contract with you. We also need to process your data to enter into a contract with you. Our lawful basis for processing is therefore 'necessary for contract'.

In some cases, The School needs to process data to ensure that we are complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

The School has a lawful basis for processing personal data during the recruitment process under the condition of 'necessary for contract' and for keeping records of the process. Data is used for the purpose of shortlisting to interview stage, however further processing enables us to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

The School process health information if we need to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where the School processes other special categories of data (sensitive personal data), such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes. This is optional and can be collected at the beginning of the recruitment process or at the point of offering the role.

The School is obliged to seek information about criminal convictions and offences. Where we seek this information, we do so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment. Employment law and health/social care are categorised as special categories of data under Article 9 of the General Data Protection Regulation (GDPR).

The School 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 includes members of the HR and recruitment team, interviewers involved in the recruitment process, managers in the School area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

The School will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. The School will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background check and the Disclosure and Barring Service and Disclosure Scotland to obtain necessary criminal records checks.

HOW DOES THE SCHOOL PROTECT DATA?

The School takes the security of your data seriously. We have 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. The School has an Information Security Policy and Data Protection Policy which details how the IT systems and data are managed and who has access. The Data Breaches Policy explains how the Committee will handle any potential breach.



FOR HOW LONG DOES THE SCHOOL KEEP DATA?

If your application for employment is unsuccessful, The School 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 available to you in a new Privacy Notice.

SHARING PERSONAL INFORMATION WITH THIRD PARTIES

In accordance with our regulatory and safeguarding obligations, for the purpose of undertaking pre-employment vetting and barring checks we may share information to undertake these checks. If you are successful in your application this process will be explained to you and you will be required to provide your express consent for your data to be shared for the purposes of those checks.

OUR LEGAL GROUNDS FOR USING YOUR INFORMATION

This section contains information about the legal basis that we are relying on when handling your information.

Legitimate interests

This means that the processing is necessary for legitimate interests except where the processing is unfair to you. The School relies on legitimate interests for most of the ways in which it uses your information.

Specifically, the School has a legitimate interest in:

Necessary for a contract

We will need to use your information in order to perform our obligations under our contract with you.

Legal obligation

Where the School needs to use your information in order to comply with a legal obligation, for example to report a concern to Children's Services. We may also have to disclose your information to third parties such as the courts, the local authority or the police where legally obliged to do so.

Vital interests

To protect the vital interests of any person where that person cannot give consent, for example, if they are seriously hurt and are unconscious.

Legal claims

The processing is necessary for the establishment, exercise or defence of legal claims. This allows us to share information with our legal advisors and insurers.

SENDING INFORMATION TO OTHER COUNTRIES

We may send your information to countries which do not have the same level of protection for personal information as there is the UK. For example, we may:

- Store your information on cloud computer storage based overseas; or
- Communicate with you by email when you are overseas (for example, when you are on holiday).



The European Commission has produced a list of countries which have adequate data protection rules. The list can be found here: http://ec.europa.eu/justice/data-protection/international-transfers/adequacy/index_en.htm

If the country that we are sending your information to is not on the list or, is not a country within the EEA (which means the European Union, Liechtenstein, Norway and Iceland) then, it might not have the same level of protection for personal information as there is the UK.

We will provide you with details about the safeguards which we have in place outside of this privacy notice. If you have any questions about the safeguards that are in place, please contact the Headmasters' PA (headmasterspa@langleyschool.co.uk)

WHAT DECISIONS CAN YOU MAKE ABOUT YOUR INFORMATION?

From 25 May 2018 data protection legislation gives you a number of rights regarding your information. Some of these are new rights whilst others build on your existing rights. Your rights are as follows:

- Where information is incorrect you can ask us to correct it
- You can also ask what information we hold about you and be provided with a copy. We will also give you extra information, such as why we use this information about you, where it came from and what types of people, we have sent it to;
- You can ask us to delete the information that we hold about you in certain circumstances. For example, we no longer need the information;
- You can ask us to send you, or another organisation, certain types of information about you in a format that can be read by computer;
- Our use of information about you may be restricted in some cases. For example, if you tell us that the information is inaccurate, we can only use it for limited purposes while we check its accuracy.

The IGMO Committee can give you more information about your data protection rights via the Headmasters' PA (headmasterspa@langleyschool.co.uk)

Further information and guidance

The Health, Safety and Compliance Officer and the School Business Manager are the persons responsible at the School for managing, on a day to day basis alongside the IGMO Committee how we look after personal information and deciding how it is shared.

Like other organisations we need to keep your information safe, up to date, only use it for what is intended, destroy it when we no longer need it and most importantly – treat the information fairly.

This notice is to explain how we use your personal information. The Compliance Committee can answer any questions which you may have.

Please email the IGMO Committee via the Headmasters' PA (headmastersps@langleyschool.co.uk) if:

- You would like us to update the information held about you; or
- You would prefer that certain information is kept confidential.



LANGLEY SCHOOL

If you consider that we have not acted properly when using your personal information, you can contact the Information Commissioners Office – ico.org.uk