

Privacy Notice – Staff and Recruitment

Reviewed: July 2021

Reviewed by: J Wilder

This notice explains what personal data (information) we will hold about all staff, how we collect it, and how we will use and may share information about staff during the application process. It applies to all individuals applying for a position at the school, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. We are required to notify staff of this information, under data protection legislation. Please ensure that you read this notice and any other similar notice we may provide to you from time to time when we collect or process personal information about you. This notice should be read alongside the school's Data Protection Policy, Privacy Notice, and Data Retention Policy.

WHO COLLECTS THE INFORMATION

Moulsford School is a 'data controller' and gathers and uses certain information about staff.

DATA PROTECTION PRINCIPLES

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

ABOUT THE INFORMATION WE COLLECT AND HOLD

Moulsford School holds and processes personal data and special category data about its current, prospective and past staff. In order to process job applications, we will collect the following information:

- The applicant's name and contact details (i.e. address, home and mobile phone numbers, email address) date of birth, gender and nationality;
- Details of qualifications, experience, employment history (including job titles, salary and working hours), reference details including details of any grievance or performance issues;
- Information regarding extracurricular interests;
- Information regarding any criminal record;
- Applicant's nationality and immigration status and information from related documents, such as from the passport or other identification and immigration information; and
- A copy of the applicant's driving licence.

We collect this information from a range of sources, which will include the application form, CV, passport or other identity documents, or information provided directly by the applicant through interviews. We will also collect information about the applicant from third parties, such as references supplied by former employers and information from DBS checks.

During employment we will collect the following information:

- Contact details of next of kin;
- Records of communications and meetings we have had with staff;
- Staff members' image and likeness;
- Financial information such as bank account number(s), name(s), and sort code(s);
- Tax status;

- Information related to pensions, national insurance and employee benefit schemes such as BUPA healthcare and gym membership; and
- Any other information that we consider relevant to the staff members' employment at the School.

We may hold the following special category personal data where this is necessary for employment, and information about criminal convictions and offences, for example:

- Information concerning staff members' health and medical conditions (for example, where required to monitor sickness absences, dietary needs or to make reasonable adjustments as required by law);
- Information concerning staff members' sexual orientation (for example, in the course of investigating complaints made by the staff member or others, for example concerning discrimination);
- Information regarding criminal convictions as may be necessary for compliance with the school's legal obligations.

We seek to ensure that our information collection and processing is always proportionate. We will notify staff of any changes to information we collect or to the purposes for which we collect and process it.

HOW WILL WE USE PERSONAL DATA?

The school needs to process this data for a number of purposes:

- Managing HR processes such as recruitment, DBS and other employment checks, payment of salaries and pensions, performance management and for training and development of staff;
- Using CCTV for the prevention and detection of crime as well as for the protection of staff and pupils;
- Complying with legal obligations such as pre-employment checks and the school's safeguarding obligations.

The legal basis the school uses for holding this information is usually that of "legitimate interests", meaning that the school needs this information in order to effectively manage the school. Some data will be held for contractual purposes, and some will be as a result of statutory or legal obligations, such as the school's obligation to ensure all staff members' right to work in the UK. Some data, such as medical data, we will hold to protect staff members' vital interests.

WHERE INFORMATION MAY BE HELD

Information may be held at our school, both in electronic and hard copy, and third party agencies, service providers, representatives and agents as described above.

HOW LONG WE KEEP INFORMATION

We keep the personal information that we obtain about staff during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep this information will depend on whether the application is successful and the applicant becomes 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. 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 anonymised, and the longer period for which they will be kept.

If the application is successful, we will keep only the recruitment information that is necessary in relation to on-going employment. Employment records are kept in accordance with our Data Retention Policy.

STAFF RIGHTS TO CORRECT AND ACCESS INFORMATION AND TO ASK FOR IT TO BE ERASED

Please contact the Bursar, our Data Protection Lead, who can be contacted on bursar@moulsford.com if (in accordance with applicable law) 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. Staff also have the right to ask for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances.

KEEPING PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, or used or accessed in an unauthorised way. We limit access to personal information to those who have a genuine business need to know it. Those processing 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 data security breach, see the Data Breach policy. We will notify the data subject and any applicable regulator of a suspected data security breach where we are legally required to do so.