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BRAMBLETYE

Recruitment Privacy Notice

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| Name: | Recruitment Privacy Notice |
| Applies to: | Whole School including EYFS |
| Reference no: | Policy 67 |
| Contributors: | HR Manager |
| Owner: | Bursar |
| Approved by: | Headmaster |
| Date reviewed: | September 2025 |
| Date approved: | September 2025 |
| Next review: | September 2026 |

1. General

Brambletye School Trust Limited, referred to in this Policy or Notice as “Brambletye School”, “the School” or “we” (company number 957506 and charity number 307003) are a ‘data controller’ for the purposes of the Data Protection Act 1998, the General Data Protection Regulation (EU) 2016/679 and any subsequent UK data protection legislation and we are responsible for, and control the processing of, your personal information.

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 School, 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 to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are applying to work with us (whether as an employee, worker, or contractor). 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.

2. Responsibility for Data Protection

The School has appointed the Bursar as Privacy and Compliance Officer.

3. 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.

4. About the Information We Collect and Hold

The table in Part 1 of the appendix 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 Part 2 of the appendix summarises the additional information we collect before making a final decision to recruit, i.e., before making an offer of employment unconditional, 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.

5. Where Information May Be Held

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

6. 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, considering 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 School. If there is a lawful 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 and you join the School, we will keep only the recruitment information that is necessary in relation to your employment. For further information, please refer to the Privacy Notice for Staff and Governors when you join.

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 an agreed fixed period.

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

7. Your Data Rights to Correct and Access Your Information and to Ask for it to be Erased

Please contact our Privacy and Compliance Officer as detailed in the section 'Queries and Complaints' 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 other rights including the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. Our Privacy and Compliance Officer will provide you with further information about your data rights, if requested. You may also want to read the Privacy Notice and Privacy Notice for Staff and Governors which provides more detail on this.

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

9. Queries and Complaints

Any comments or queries on this policy or notice should be directed to the Bursar who acts as the Privacy and Compliance Officer (via the School Office) using the following contact details. Address: Brambletye School, Lewes Road, East Grinstead, West Sussex, RH19 3PD, Telephone: 01342 321004.

We hope that any query or concern you raise about our use of your information can be resolved with the Privacy and Compliance Officer. However, if an individual believes that the school has not complied with this policy or acted otherwise than in accordance with Data Protection Law, they should utilise the school complaints procedure and should also notify the Headmaster using the above contact address and telephone. You can also contact the Information Commissioner's Office (ICO) for further information about your rights and how to make a formal complaint, although the ICO recommends that steps are taken to resolve the matter with the school before involving the regulator.

Appendix - Schedule About The Information We Collect and Hold

Part 1 – Up to and Including the Shortlist Stage

| The Information We Collect | How We Collect the Information | Why We Collect the Information |
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| Your current and any former names, title, date of birth, gender, national insurance number, and contact details (i.e., current address, home and mobile phone numbers, email address). | From you. | <p>Legitimate interest: to conduct a fair recruitment process.</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages.</p> |
| Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests. | From you, in the completed application form and interview notes (if relevant). | <p>Legitimate interest: to conduct a fair recruitment process.</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.</p> |
| Your name, contact details and details of your qualifications, experience, employment history and interests. | From you, in the completed application form and interview notes (if relevant). | <p>Legitimate interest: to conduct a fair recruitment process.</p> <p>Consent (if given): if you are unsuccessful in your application, your details may be passed on to an associated School to see if they have any suitable vacancies.</p> |
| Information about you that is publicly available online through online searches. | From standard online searches using a web browser, website, or social media platform. | <p>Legitimate interest: to form part of the school's wider safeguarding due diligence.</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.</p> <p>To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE).</p> |
| Your racial or ethnic origin, sex, and sexual orientation, religious or similar beliefs. | From you, in an anonymised equal opportunity monitoring form. | To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment). |
| Details of your referees. | From your completed application form. | Legitimate interest: to conduct a fair recruitment process. |

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| | | To comply with our legal obligations to request references. |
| Criminal Record Information or information that would make you unsuitable to work with children. | From your self-declaration form. | <p>Legitimate interests: to conduct a fair recruitment process including giving applicants the opportunity to discuss their disclosure with the School before a DBS check is obtained.</p> <p>To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education (KCSIE)</i>.</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty).</p> |

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 you that is publicly available online through online searches. | From standard online searches using a web browser, website, or social media platform. | To make an informed recruitment decision. | The member of staff carrying out the search may share relevant information with the interviewers. Search results will be reviewed and, if appropriate, explored with the applicant at interview |
| *Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time keeping and attendance, the reason you left your current | From your referees (details of whom you will have provided). | <p>Legitimate interest: to make an informed decision to recruit.</p> <p>To comply with our legal obligations including those contained in the</p> | <p>To obtain the required reference about you.</p> <p>To comply with legal/regulatory obligations.</p> |

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| <p>or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "<i>Keeping Children Safe in Education</i>" (KCSIE), from references obtained about you from previous employers and/or education providers.</p> | | <p>statutory guidance for schools: Keeping Children Safe in Education (KCSIE).</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice.</p> | <p>Information shared with relevant managers and HR personnel.</p> |
| <p>*In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach.</p> | <p>From a letter from the professional regulating authority in the country (or countries) in which you have worked.</p> | <p>Legitimate interest: to make an informed decision to recruit.</p> <p>To comply with our legal obligations including those contained in the statutory guidance for schools: Keeping Children Safe in Education (KCSIE).</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice.</p> | <p>To comply with legal/regulatory obligations.</p> <p>Information shared with relevant managers and HR personnel.</p> <p>Information shared with DBS and other regulatory authorities as required.</p> |
| <p>*Information regarding your academic and professional qualifications.</p> | <p>From you, from your education provider, from the relevant professional body.</p> | <p>Legitimate interest: to verify the qualifications information provided by you.</p> <p>To comply with our legal obligations.</p> | <p>To make an informed recruitment decision.</p> |
| <p>*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</p> | <p>From the Disclosure and Barring Service (DBS).</p> <p>From overseas jurisdictions in accordance with</p> | <p>To perform the employment contract.</p> <p>To comply with our legal obligations.</p> <p>Legitimate interest:</p> | <p>To make an informed recruitment decision.</p> <p>To conduct statutory checks.</p> |

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| <p>1975 (as amended) and, where appropriate, overseas criminal records checks.</p> | <p>Home Office guidance.</p> <p>In respect of agency and third-party staff (supply staff), from any agency or third-party organisation.</p> <p>In respect of fee-funded trainee teachers, from the initial teacher training provider.</p> | <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty).</p> | <p>Information shared with DBS and other regulatory authorities as required.</p> <p>For further information, see * below.</p> |
| <p>*Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information.</p> | <p>From you and, where necessary, the Home Office.</p> | <p>To enter into/performance the employment contract.</p> <p>To comply with our legal obligations.</p> <p>Legitimate interest: to maintain employment records.</p> | <p>To conduct right to work checks.</p> <p>Information may be shared with the Home Office.</p> |
| <p>*A copy of your driving licence (if applicable).</p> | <p>From you.</p> | <p>To enter into/performance the employment contract.</p> <p>To comply with our legal obligations.</p> <p>To comply with the terms of our insurance.</p> | <p>To make an informed recruitment decision.</p> <p>To ensure that you have a clean driving licence.</p> <p>Information may be shared with our insurer.</p> |

You are required by law to enter into your Contract of Employment, to provide the categories of information marked with an * above, to enable the School to verify your right to work and suitability for the position you have applied for.

Further details on how we handle sensitive personal information and information relating to criminal convictions and offences can be obtained from the HR Manager.