

HOLLINGWORTH LEARNING TRUST RECRUITMENT PRIVACY POLICY

Created:	Spring 2020
Reviewed:	
Version:	1
Next Review:	Live Document: To be updated as and when new advice and guidance is received regarding Data Protection, GDPR and Freedom of Information.
Governors:	To be reviewed by Governors every 12 months

VERSION INFORMATION

Version	Reason for Update	Author	Date	Approved By:
1	Original Policy	S Collinge D Beaumont	Spring 2020	Headteacher

Hollingworth Learning Trust: Recruitment Privacy Notice 2020

Under data protection law, individuals have a right to be informed about how the trust uses any personal data we hold about them. We comply with this right by providing 'privacy 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 jobs at our trust.

We, Hollingworth Learning Trust, are the 'data controller' for the purposes of data protection law.

Our Data Protection Officer is Ms S Collinge (see Contact Section for further information).

Successful candidates should refer to the trust 'Staff Workforce Privacy Notice' for information about how their personal data is collected, stored and used.

The personal data we hold

We process data relating to those applying to work at our trust. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not restricted to:

- Contact details.
- Copies of right to work documentation.
- References.
- Evidence of qualifications.
- Employment records, including work history, job titles, training records and professional memberships.

We may also collect, store and use information about you that falls into "special categories" of more sensitive personal data. This includes information about (where applicable):

- Race, ethnicity, religious beliefs, age.
- Disability and access requirements.
- Photographs and CCTV images captured in our schools.

Why we collect and use this data

The purpose of processing this data is to aid the recruitment process by:

- a) Enabling us to establish relevant experience and qualifications.
- b) Facilitating safe recruitment, as part of our safeguarding obligations towards pupils.
- c) Enabling equalities monitoring.
- d) Ensuring that appropriate access arrangements can be provided for candidates that require them.

Our lawful basis for using this data

Under the General Data Protection Regulation (GDPR), our lawful bases for processing your personal data for the purposes listed above are as follows:

For the purposes of **(a), (c) and (d)**, in accordance with the '**public task**' basis, collecting and processing data is necessary to perform tasks that the trust is required to complete as part of their statutory function.

For the purpose of **(b)**, in accordance with the '**legal obligation**' basis, the trust is required to collect and process data to meet our responsibilities under law as set out here:

- Safer Recruitment and Safeguarding obligations.

Less commonly, we may also use personal information about you where:

- You have given us consent to use it in a certain way.
- We need to protect your vital interests (or someone else's interests).

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing it if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you overlap, and there may be several grounds which justify the trust's use of your data.

Collecting this information

While the majority of the information we collect from you is mandatory, there is some information that you can choose whether or not to provide to us.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, via application forms, but we may also hold data about you from:

- Local authorities and previous employers/schools.

Storing Information

We hold data securely for the set amount of time as shown in our data retention schedule. For more information on our data retention schedule and how we keep your data safe, please visit

[Information and Records Management Society's toolkit for schools.](#)

Data sharing

We do not share information about you with any third party without your consent, unless the law and our policies allow us to do so.

Where it is legally required or necessary (and it complies with data protection law), we may share personal information about you with:

- 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.

Your rights

How to access the personal information we hold about you.

Under data protection legislation, you have the right to request access to information we hold about you. Individuals have a right to make a 'subject access request' to gain access to personal information that the trust holds about them.

If you make a subject access request, and if we do hold information about you, we will:

- 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.
- Give you a copy of the information in an intelligible form.

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You may also have a right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact our Data Protection Officer.

Your other rights regarding your data.

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress.
- Prevent your data being used to send direct marketing.
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person).
- In certain circumstances, have inaccurate personal data corrected, deleted or destroyed, or restrict processing.
- Claim compensation for damages caused by a breach of the data protection regulations.

To exercise any of these rights, please contact our data protection officer.

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 our Data Protection Officer.

Alternatively, you can make a complaint 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

Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact:

- Ms Susan Collinge, Compliance Manager and DPO on 01706 292800 or via email dpo@hollingworthacademy.co.uk
- In writing to the trust at: Hollingworth Academy
Cornfield Street
Milnrow
Rochdale
OL16 3DR
- Our Local Authority: <http://www.rochdale.gov.uk/>