



Recruitment Privacy Notice

Updated: 02-26
Prepared by: KED/SHCC

Next Review: 10-27
Authorised by: TZL

What this Privacy Notice is for

This recruitment privacy 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 enquiring about or 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 in order to find out more about our job applicants, including referees or those who are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are enquiring about a position at our School or applying to work with us (whether as an employee, self-employed individual, 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.

Who collects the information?

The Cavendish School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

31 Inverness Street
London
NW1 7HB
0207 485 1958
secretary@cavendish-school.co.uk

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 for Staff. 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

About the information we collect and hold

The table in Part 1 of the schedule below 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 schedule below 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.

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.

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, 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. This is likely to be for twelve 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, and once the twelve month period set out above comes to an end, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the School's Privacy Notice.

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 a fixed period on that basis.

Your data rights to correct and access your information and to ask for it to be erased

Please contact our Head of HR & Compliance, Kerry Dignan, who can be contacted at hrcomp@cavendish.co.uk 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 Head of HR & Compliance will provide you with further information about your data rights if you ask for it. You may also want to read the School's Privacy Notice, which provides more detail on this.

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.

Online checks

All candidates shortlisted for interview will undergo an online check (including social media) for the purpose of ensuring the Teachers' Standards and the School's values are protected. Our staff are expected to uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside School, and also online. Analysing up-to-date social and behavioural online data will help us to gain a clear picture of the values our staff will bring to the School and will ensure we are doing everything we can to cultivate an institution-wide standard for inclusion. Online vetting will be carried out in accordance with the Keeping Children Safe in Education guidelines set out by the Department for Education and/or industry best practice. Checks will be carried out by a third-party professional screening company, which will also be a member of the Professional Background Screening Association (PBSA). Checks will be kept confidential, and held in accordance with the 'how long we keep your information for' section above and can be shared with the candidate if requested.

Specific consent is obtained from candidates to carry out these checks via their application forms. Personal candidate data from these forms is shared with a third-party professional screening partner, SP Index (www.sp-index.com), experienced in processing personal data for the purpose of such checks.

You can find out more about how these checks are carried out, the types of personal data collected and how personal data will be used at <https://sp-index.com/privacy-policy/>

We expect our staff to present themselves online to the same standards as they would in the workplace and not to engage in inappropriate use of social network sites, which may bring themselves, the School or the School community into disrepute.

Only information relevant to the role being applied for will be shared with the relevant interviewing panel.

How to complain

Our Head of HR & Compliance oversees compliance with this recruitment privacy notice. We hope that she can resolve any query or concern you raise about our use of your information. If not, you

can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

Schedule - About the information we collect and hold

Part 1 - Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your current and any former names, title, date of birth, national insurance number and contact details (i.e. current and previous addresses for the last 10 years, home and mobile phone numbers, email address)	From you, in the completed application form	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages	To enable our Head of HR and Compliance to contact you to progress your application, arrange interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary, reason for leaving previous roles, and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision Both the person making the shortlisting decision and, if you are invited for interview, the interviewer will receive these details.
Information about you that is publicly available online through online searches	Personal information collected from candidates on their application forms is shared with a third-party professional screening partner, SP Index (www.sp-index.com), experienced in processing personal data for the purpose of such checks	Legitimate interest: to form part of the school's wider safeguarding due diligence Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit. To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE)	To make an informed recruitment decision. Search results will be reviewed by the Head of HR & Compliance and/or Bursar and, if appropriate, shared with the decision makers and explored with the applicant at interview. To comply with legal/regulatory obligations. For further information, see * below

Your racial or ethnic origin, sex and sexual orientation, date of birth, religious or similar beliefs, details of any disabilities you have disclosed	From you, in a completed equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process To comply with our legal obligations to request references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with Head of HR & Compliance and decision makers.
Criminal Record Information or information that would make you unsuitable to work with children	From your self-declaration form and/or current DBS certificate supplied at interview	Legitimate interests: to carry out a fair recruitment process, including giving candidates the opportunity to discuss their disclosure with the School before a DBS check is obtained. To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision and given candidates the opportunity to discuss their disclosure with the School. To comply with legal/regulatory obligations For further information, see * below

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 your previous academic and/or employment history, including details of any conduct, grievance or performance issues, time keeping and attendance, the reason you left your current or most recent post and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "Keeping Children Safe in Education" (KCSIE), from references obtained about you from previous employers and/or education providers. Referees will be asked about your suitability to work with children ☐	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To obtain the required reference about you To comply with legal/regulatory obligations Information shared with Head of HR & Compliance and decision makers The reference is confidential and will not be shared with you unless we are required or able to do so
ID documents and proof of address ☐	From shortlisted candidates invited to interview	Legitimate interest: to form part of the school's wider safeguarding due diligence To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To comply with legal/regulatory obligations Information shared with Head of HR & Compliance and decision makers

Information obtained from social media checks	Carried out by an external company on shortlisted candidates invited to interview	Legitimate interest: to form part of the school's wider safeguarding due diligence To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interest: to make an informed decision to recruit	To comply with legal/regulatory obligations Information shared with Head of HR & Compliance, Bursar and decision makers To make an informed recruitment decision and give candidates the opportunity to discuss the findings with the School.
In respect of applicants who have lived or worked overseas for more than 3 months in the last 10 years, an overseas police check from the relevant country/countries, plus anything else the School considers relevant ☐	From the relevant police force/s – this will either be directly by the applicant or from the School, this is dependent on the country in question, as it differs between countries	Legitimate interest: to form part of the school's wider safeguarding due diligence To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interest: to make an informed decision to recruit	To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel To make an informed recruitment decision and give candidates the opportunity to discuss the findings with the School.
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 ☐	From a letter from the professional regulating authority in the country (or countries) in which you have worked	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations, including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE).	To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel Information shared with DBS and other regulatory authorities as required

		Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	
Information regarding your academic and professional qualifications ☐	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you To comply with our legal obligations	To make an informed recruitment decision
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 1975 (as amended) and, where appropriate, overseas criminal records checks ☐	From the Disclosure and Barring Service (DBS) From overseas jurisdictions in accordance with Home Office guidance In respect of agency and third-party staff (supply staff), from any agency or third-party organisation In respect of fee-funded trainee teachers, from the initial teacher training provider	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ☐	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office

Information regarding your health, including your medical history, present health status and any workplace adjustments required ☐	From you, including via a health questionnaire and medical examination	To comply with our legal obligations including those contained in the Equality Act 2010 and statutory guidance for schools: Keeping Children Safe in Education (KCSIE)	To make an informed recruitment decision To comply with legal/regulatory obligations including considering adjustments necessary to enable you to perform the role for which you have applied Information shared with the School's medical advisers including the School doctor and occupational health adviser Information shared with medical adviser carrying out your medical examination
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You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in the explanatory note attached to the application form for the role, available from the Head of HR & Compliance on hrcomp@cavendish-school.co.uk