

# St Jude's Catholic Primary School

## Recruitment Privacy Notice

Under data protection law, individuals have a right to be informed about how the school uses any personal data that we hold about them. We comply with this right by providing 'Privacy Notices' (sometimes called Privacy policies') to individuals where we are processing their personal data.

This **Privacy Notice** explains how, once you have submitted a job application to us, we will gather and use information relating to you. Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from you directly and data about you that we obtain from other people and organisations. We might also need to continue to hold an individual's personal data for a period of time after the recruitment process, even if you are unsuccessful. Anything that we do with an individual's personal data is known as "processing".

We, St Jude's Catholic Primary School, are the 'data controller' for the purposes of data protection law. Our **Data Protection Officer (DPO)** is **Nick Holden** from NexusProtect (see 'Contact us' below).

### The personal data we hold

We may collect, hold, share and otherwise use the following personal data about you during your application process.

- Name, address, contact details, date of birth, marital status and gender
- Recruitment information, including copies of right to work documentation, references and other information included in a CV or cover letter or as part of the application process
- Qualifications and employment records, including work history, job titles, working hours, training records and professional memberships
- Information about your criminal record
- Outcomes of any disciplinary and/or grievance procedures
- Absence data
- Details of your referees
- Whether you are related to any member of our workforce or governing body
- details of any support or assistance you may need to assist you at the interview because of a disability
- Information available through internet searches and social media
- CCTV footage

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, sexual orientation and political opinions

- Trade union membership
- Health, including any medical conditions, and sickness records

*Following shortlisting stage, and prior to making a final decision, we may also collect and process the following:*

- information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;\*
- confirmation of your academic and professional qualifications (including seeing a copy of certificates);\*
- information via the DBS process, regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs), whether you are barred from working in regulated activity;\*
- your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information;\*
- medical check to indicate fitness to work;\*
- a copy of your passport and/or driving licence (or other appropriate documentation as listed on the Home Office list);\*
- if you are a teacher, we will check the National College of Teaching and Leadership (“NCTL”) Teachers Services about your teacher status, whether you are subject to a prohibition from teaching order and any other relevant checks (for example Section 128 direction for management posts and EEA teacher sanctions);\* and
- equal opportunities’ monitoring data.

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. Without providing us with this information, or if the information is not satisfactory, then we will not be able to proceed with any offer of employment.

### **Why we use this information**

We will process your personal data during your application process for the purpose of complying with legal obligations, carrying out tasks which are in the public interest, and taking steps with a view to entering into an employment contract with you. This includes:

- to assess your suitability for the role you are applying for;
- to take steps to enter into a contract with you;
- to check that you are eligible to work in the United Kingdom or that you are not prohibited from teaching; and
- so that we are able to monitor applications for posts in the school to ensure that we are fulfilling our obligations under the public sector equality duty under the Equality Act 2010.

### **Our lawful basis for using this data**

We only collect and use personal information about you when the law allows us to. Most commonly,

we use it where we need to:

- Comply with a legal obligation
- Carry out a task in the public interest

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 consent if you wish to do so.

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

### **Collecting this information**

While the majority of 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.

### **How we store this data**

We create and maintain a recruitment file for each vacancy advertised. The information contained in this file is kept secure and is only used for purposes directly relevant to recruiting for the post.

We will hold information relating to your application only for as long as necessary. If you are successful then your recruitment information will transfer into your employee file (see our staff/workforce privacy notice for more information). If you are unsuccessful we will hold your personal data only for six months, after which time it is securely deleted and/or destroyed.

### **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, central and local government – to meet our legal obligations to share certain information
- The Department for Education – to meet our legal obligations to share certain information

### **Transferring data internationally**

Where we transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

### **How We Use Approved Artificial Intelligence (AI) tools**

We use approved and secure AI tools only to support education and administration, not to make final, significant decisions about staff.

Internal AI Tools: We may use AI-driven software (vetted and approved by the school) for tasks like:

- Administrative Support: Summarising meeting notes or identifying trends in anonymised

school data.

Data Protection Safeguards:

- We **DO NOT** input identifiable, sensitive, or high-risk data into public or open-source AI tools (like free chatbots).
- Any AI used for assessment or support is always subject to human review and oversight by a senior staff member.
- A Data Protection Impact Assessment (DPIA) is conducted before any new AI tool is adopted.

If an AI system is used to assist in a decision that significantly affects you, you will be informed, and you have the right to request a human review of that decision.

## Your rights

### How to access personal information we hold about you

Individuals have a right to make a **Subject Access Request (SAR)** to gain access to personal information that the school 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

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

If you would like to make a **Subject Access Request (SAR)**, 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 by 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 complaints about our collection and use of personal information very seriously.

Should you wish to make a complaint regarding how your data is being handled, stored or processed

or about anything else covered in this Privacy Notice please contact the **Headteacher**, in the first instance.

Any complaint will be acknowledged within 30 days and will be responded to without undue delay.

If you are dissatisfied with the school's response to your complaint, or the way it was handled, then you can complain to the ICO via their website – <https://ico.org.uk/concerns/>

or their helpline - **0303 123 1113**

### **Contact us**

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our **Data Protection Officer**:

- **Nick Holden** at [enquiries@saintjudes.wigan.sch.uk](mailto:enquiries@saintjudes.wigan.sch.uk) or [governance@nexus-global.co.uk](mailto:governance@nexus-global.co.uk)