



HIGHFIELDS SCHOOL

PRIVACY NOTICE FOR RECRUITMENT CANDIDATES

BOUNDARY WAY, PENN, WOLVERHAMPTON, WV4 4NT
Telephone: 01902 556530 E-mail: enquiries@hswv.co.uk Website: www.hswv.co.uk

About this Privacy Notice for recruitment candidates

This privacy notice explains how we collect, store and use personal data about individuals who apply for jobs with Highfields School.

Personal data is any information that can be used to identify you. It may include information you provide as part of an application process, information we already hold about you if you are already an employee, or information we collect from other organisations as part of pre-employment checks. When we use your personal data, this is known as “processing”.

Under data protection law, individuals have a right to be informed about how we collect, use and share personal data in relation to these processes. We comply with this right by publishing a privacy notice and making this available to you before you take part in our recruitment process.

Highfields is registered as a ‘data controller’ with the Information Commissioner’s Office (ICO), meaning that we are responsible for determining how your personal data is used.

We have a Data Protection Officer (DPO) to help us comply with our data protection responsibilities. Our DPO is provided by Services4Schools and they can be contacted at dpo@hswv.co.uk. You can contact them directly, if you need any further information about how we use your personal data.

What information do we collect?

Highfields only collect information about you that is necessary to support our recruitment and candidate management processes. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which we need to make reasonable adjustments during the recruitment process;
- information required to conduct statutory safeguarding checks;
- information relating to your performance and conduct from current and previous employers in the form of references;
- information about your entitlement to work in the UK; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health, and religion or belief.

How do we collect your information?

When you apply for a job with us, Highfields collects your information in a variety of ways. For example, data might be contained in application forms, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Highfields will also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks via the Disclosure and Barring Service.

In line with Part Three: Safer recruitment (Keeping Children Safe in Education 2023)

Shortlisting Process – Due Diligence

All shortlisted candidates will complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. An electronic signature will be replaced by a physical signature at

the point of interview. The self-declaration will allow candidates the opportunity to share relevant information and allow this to be discussed and considered at interview before an Enhanced DBS certificate is received.

An online search will be undertaken for all shortlisted candidates as part of our due diligence processes. This may help identify any incidents or issues that have occurred and are publicly available online. Any related information will be shared with the interview panel to allow discussion with the candidate(s) at interview.

Where will your data be stored?

Data will be stored in a range of different places, including on your application record, in paper records, on our management systems, on our cloud-based IT infrastructure and on other internal IT systems (including email).

Why we process your personal data?

Highfields needs to process your personal data as part of the recruitment process. In some cases, we need to use your information to ensure we are complying with our legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts. We also have statutory duties to undertake in relation to safeguarding and safer recruitment guidance such as *Keeping Children Safe in Education*.

We have a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows us to manage the recruitment process, assess and confirm a candidate's suitability for employment, and decide to whom to offer a job. We may also need to process data from job applicants to respond to and defend against legal claims.

Where we have relied on legitimate interests as a reason for processing data, we have considered whether or not those interests are overridden by the rights and freedoms of applicant and potential employees and have concluded that this is not the case.

Highfields processes health information if it needs to make reasonable adjustments to the recruitment process for candidates who have a disability. This is to carry out its obligations and exercise specific rights in relation to employment.

Where we process other special categories of data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is for equal opportunities monitoring purposes.

As an education provider, Highfields is obliged to seek information about criminal convictions and offences. Where we seek this information, it does so because it is necessary for us to carry out our obligations and exercise specific rights in relation to employment.

We will not use your data for any purpose other than the recruitment exercise for which you have applied.

Who has access to your data?

Your information will be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment panel, interviewers involved in the recruitment process, managers in the area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

Other than to request references in line with safer recruitment practices and to obtain relevant background and right to work checks, or where the process requires additional scrutiny, Highfields will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment.

Highfields will also share your data with third party providers such as the Disclosure and Barring Service to obtain necessary criminal records checks.

Highfields will share your data with our legal representatives if a legal process determines it necessary to do so, or we are required to do so by a UK court.

We will share your personal data with other official bodies (for the purposes of preventing and investigation of criminal activities, including fraud).

Highfields will not transfer your data outside the UK without obtaining your consent and before ensuring there are appropriate contractual and security provisions in place.

How does the Trust protect personal data?

Highfields takes the security of your data seriously. It has internal policies such as a Data Protection Policy and Records Management Policy in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties. These policies can be viewed at policies tab of our school website: <http://www.hswv.org.uk/school-policies> .

How long do we keep recruitment data?

If your application for employment is unsuccessful, we will hold your data on file for 6 months after the end of the relevant recruitment process. At this point it will be disposed of securely in line with our Records Management Policy.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your HR file and retained during your employment.

The periods for which your data will be held will be provided to you in a new privacy notice once you are employed by Highfields School.

What if you do not provide your personal data?

You are under no statutory or contractual obligation to provide data to Highfields during the recruitment process. However, if you do not provide the information, we may not be able to process your application properly, or at all.

You are under no obligation to provide information for equal opportunities monitoring purposes and there are no consequences for your application if you choose not to provide such information.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require us to change incorrect or incomplete data;
- require us to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where we are relying on legitimate interests as the legal ground for processing; and
- ask us to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override our legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact our Data Protection Officer (DPO) at dpo@hswv.co.uk You can also make a subject access request by emailing this address.

If after contacting our DPO, you believe that we have complied with our data protection obligations, or upheld your rights appropriately, you can complain to the Information Commissioner at <https://ico.org.uk/make-a-complaint/>.

Questions/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.

If you have any questions, concerns or would like more information about anything mentioned in this Privacy Notice, please contact our Information Management Systems Manager:

Mr W Harrison - wharrison@hswv.co.uk, telephone 01902 556530

or by writing to Highfields School, Boundary Way, Wolverhampton, WV4 4NT.

Alternatively, you may wish to contact our Data Protection Officer:

Services 4 Schools - DPO@hswv.co.uk

or by writing to Highfields School, Boundary Way, Wolverhampton, WV4 4NT.

Please address letters: For the attention of the Data Protection Officer.

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.

Revisions and last updated

We may need to update this privacy notice periodically, so we recommend that you revisit this information from time to time.

This version was last updated September 2023.