



# WELLESLEY HOUSE

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## WELLESLEY HOUSE Recruitment Data Protection Privacy Notice

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 Wellesley House, 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 that are provided by job applicants as an emergency contact. 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**

Wellesley House and St. Peter's Court Educational Trust Ltd is a registered Charity No. 307852; Company No. 859223 ('School') is the 'Data Controller' and gathers and uses certain information about you. The School's contact details are as follows:

Wellesley House School  
114 Ramsgate Road  
Broadstairs  
KENT CT10 2DG

(01843) 862991

[bursar@wellesleyhouse.net](mailto:bursar@wellesleyhouse.net)

## **DATA PROTECTION PRINCIPLES**

We will comply with the data protection principles when gathering and using personal information, as set out in our Data Protection Policy.

## **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 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 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 clear business 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, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see School Privacy Notice.

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

#### **YOUR DATA RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK IT TO BE ERASED**

Please contact the Bursar who can be contacted as detailed above 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 the right to ask for information we hold and process to be erased ('the right to be forgotten') or not used in certain circumstances. The Bursar will provide you with further information about your data rights, if you ask for it. You may also want to read the School 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, or used or accessed in an unauthorised way. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine business 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.

#### **HOW TO COMPLAIN**

We hope that the Bursar 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  |
|---|--|--|---|
| <p><b>Your name and contact details (i.e. address, home and mobile phone numbers, email address)</b></p>                                    | <p>From you</p>  | <p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p> | <p>To enable the Bursar or Manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant manager or department of your application</p> |
| <p><b>Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests</b></p> | <p>From you, in the completed application form and interview notes (if relevant)</p> | <p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>         | <p>To make an informed recruitment decision</p> <p>Both the person making the shortlisting decision and, if you are invited for interview, the interviewer will receive these details.</p>  |
| <p><b>Your name, contact details and details of your qualifications, experience, employment history and interests</b></p>                   | <p>From you, in the completed application form and interview notes (if relevant)</p> | <p>Legitimate interest: to carry out a fair recruitment process</p>  |   |
| <p><b>Information regarding your criminal record</b></p>  | <p>From you, in your completed application form</p>                                  | <p>To comply with our legal obligations</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the</p>                                     | <p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p>  |

|                                 |                                      |   |  |
|---------------------------------|--------------------------------------|---|--|
|                                 |                                      | public against dishonesty)  | For further information, see * below   |
| <b>Details of your referees</b> | From your completed application form | Legitimate interest: to carry out a fair recruitment process<br><br>In the regulated sector, to comply with our legal obligations to request references | To carry out a fair recruitment process<br><br>To comply with legal /regulatory obligations<br>Information shared with relevant managers and the referee |

**Part 2 Before making a final decision to recruit**

| <b>The information we collect</b>   | <b>How we collect the information</b>                                       | <b>Why we collect the information</b>   | <b>How we use and may share the information</b>   |
|---|---|---|---|
| <b>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</b> <input type="checkbox"/> | From your referees (details of whom you will have provided)                 | Legitimate interest: to make an informed decision to recruit<br><br>To comply with our legal obligations<br><br>Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice | To obtain the relevant reference about you<br><br>To comply with legal/regulatory obligations<br><br>Information shared with relevant managers and HR personnel |
| <b>Information regarding your academic and professional qualifications</b> <input type="checkbox"/>   | From you, from your education provider, from the relevant professional body | Legitimate interest: to verify the qualifications information provided by you   | To make an informed recruitment decision  |

|  |   |  |  |
|--|---|--|--|
| <p><b>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) <input type="checkbox"/></b></p>                    | <p>From you and from the Disclosure and Barring Service (DBS)</p> | <p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)</p> | <p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p> <p>For further information, see * below</p> |
| <p><b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/></b></p> | <p>From you and, where necessary, the Home Office</p>             | <p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to maintain employment records</p>  | <p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>   |
| <p><b>A copy of your driving licence <input type="checkbox"/></b></p>  | <p>From you</p>   | <p>To enter into/perform 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>For Identification verification</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 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 our Safer Recruitment Policy available on the School website and from the Bursar.