



## Data protection privacy notice (recruitment)

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 the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. 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.

### 1 WHO COLLECTS THE INFORMATION

Dolphin School ('School') is a 'controller' and gathers and uses certain information about you. The School's contact details are as follows:

Dolphin School

Waltham Road

Hurst

Berkshire

RG0FR

Tel: 0118 9341277

Email: [enquiries@dolphinschool.com](mailto:enquiries@dolphinschool.com)

### 2 DATA PROTECTION PRINCIPLES

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

### 3 ABOUT THE INFORMATION WE COLLECT AND HOLD

The table set out 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, ie 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. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

#### **4 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.

#### **5 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 the Staff Privacy Notice.

Further details on our approach to information retention and destruction are set out in our Retention of Records Policy.

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

Please contact our Compliance and Privacy Officer (CPO), Kim Tsang who can be contacted at [bursar@dolphinschool.com](mailto:bursar@dolphinschool.com) and 0118 9341277 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 CPO for some but not all of the information we hold and process to be erased (the 'right to be forgotten') in certain circumstances. Our CPO will provide you with further information about the right to be forgotten, if you ask for it. You may also want to read the Staff Privacy Notice which provides more detail on this.

## 7 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. 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 data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

## 8 HOW TO COMPLAIN

We hope that our CPO can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner 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
<b>Your name and contact details (ie address, home and mobile phone numbers, email address)</b>	From you	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 HR personnel or the manager of the relevant department 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
<b>Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests</b>	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.
<b>Your name, contact details and details of your qualifications,</b>	From you, in the completed application	Legitimate interest: to carry out a fair recruitment process	To see whether an associated School has any suitable vacancies

<b>experience, employment history and interests</b>	form and interview notes (if relevant)	Legitimate interest: if you are unsuccessful in your application, your details may be passed on to an associated School to see if they have any suitable vacancies	
<b>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</b>	From you, in a completed anonymised 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
<b>Information regarding your criminal record</b>	From you, in your completed application form	To comply with our legal obligations 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
<b>Details of your referees</b>	From your completed application form	Legitimate interest: to carry out a fair recruitment process In the regulated sector, 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 relevant managers, HR personnel 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 <input type="checkbox"/></b>	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 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 To comply with legal/regulatory obligations 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
<b>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs)</b> <input type="checkbox"/>	From you and from the Disclosure and Barring Service (DBS)	To perform the employment contract To comply with our legal obligations Legitimate interest: to verify the criminal records information provided by you 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
<b>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information</b> <input type="checkbox"/>	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
<b>A copy of your driving licence</b> <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

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 Personal Data Handling Policy, a copy of which can be requested from our CPO.

Reviewed: November 2020

Next review: November 2021