POLICY

POLICY TYPE

MAT Policy to adopted in full across all schools	
LGC Policy to be reviewed and approved locally	✓

Approval Date:	**2026/27 – AUTUMN TERM**
Review Date:	**2028/29 – AUTUMN TERM**

"Share the Love of God, every day in everything we learn, do and say"

ST PHILOMENA'S CATHOLIC PRIMARY SCHOOL

PRIVACY NOTICE FOR JOB APPLICANTS

Document Owner and Approval

The Headteacher is responsible for ensuring that this document is reviewed in line with the school's policy review schedule and the Trust's data protection requirements.

This privacy notice describes how we collect and use personal information about you during and following the recruitment and selection process, in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025.

Successful candidates should refer to our Privacy Notice for Staff for information about how their personal data is stored and collected during their employment.

Who Collects this Information

St Philomena's Catholic Primary School is part of St Oscar Romero Catholic Academy Trust. The Trust is the data controller of personal data and gathers and uses certain data about you. This means that we are responsible for deciding how we hold and use your personal information.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other policies mentioned within this privacy notice. This will assist you with understanding how we process your information and the procedures we take to protect your personal data.

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.

Categories of Information We Collect, Process, Hold and Share

We may collect, store and use the following categories of personal information about you during the application and shortlisting stages of the recruitment process:

- Personal information and contact details such as name, title, address, telephone numbers and personal email addresses;
- Information entered on the application form, CV and details of qualifications;
- Details of your employment history, including job titles, salary and working hours, where relevant;
- Details of your referees;

- Information relating to equal opportunities monitoring, including your racial or ethnic origin, sex, sexual orientation, religious or similar beliefs, where appropriate.

We may also collect information following shortlisting and at subsequent stages of the recruitment process in order to make a final decision on whether to recruit:

- Data about your previous academic and/or employment history, including relevant details of conduct, grievance or performance issues, from references obtained about you from previous employers and/or education providers;
- Data regarding your academic and professional qualifications;
- Information regarding your criminal record, including self-declarations and Disclosure and Barring Service (DBS) checks, where appropriate and legally permitted;
- Details collected through pre-employment checks, including online searches of publicly available information relating to shortlisted candidates;
- Your nationality and immigration status and data from related documents, such as your passport or other identification and immigration information;
- A copy of your driving licence, where relevant to the role;
- Data relating to your health, where permitted under the Equality Act 2010;
- Other information required to complete relevant statutory safeguarding and pre-employment checks.

How We Collect this Information

We may collect this information from you, your referees, your education provider, by searching publicly available online resources, from relevant professional bodies, the Home Office and the DBS.

In accordance with Keeping Children Safe in Education (KCSIE), we may undertake online searches of publicly available information relating to shortlisted candidates as part of our safer recruitment and due diligence procedures.

How and Why We Use Your Information

We will only use your personal information when the law allows us to. Most commonly, we will use your information in the following circumstances:

- Where we need to take steps at your request to enter into a contract with you (Article 6(1)(b) of the UK GDPR);
- Where we need to comply with a legal obligation, such as safeguarding, health and safety and employment legislation (Article 6(1)(c));
- Where it is needed in the public interest or for official purposes, including carrying out applicable statutory functions (Article 6(1)(e));
- Where it is necessary for our legitimate interests, such as the establishment or defence of legal claims, and your interests, rights and freedoms do not override

those interests (Article 6(1)(f)). This lawful basis will not be relied upon when carrying out our public tasks;
- Where you have freely provided your consent for us to process your personal data for a specific purpose (Article 6(1)(a)).

Generally, the purpose of us collecting your data is to enable us to facilitate safe recruitment and determine suitability for the role. We also collect data in order to carry out equal opportunities monitoring and to ensure appropriate access arrangements are put in place if required.

If you fail to provide certain information when requested, we may not be able to take the steps to enter into a contract with you, or we may be prevented from complying with our legal obligations.

We will only use your personal information for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose.

How We Use Particularly Sensitive Information

Sensitive personal information, as defined under the UK GDPR as special category data, requires higher levels of protection and further justification for collecting, storing and using this type of personal information.

In addition to a lawful basis under Article 6 of the UK GDPR, we will only process special category data where an appropriate condition under Article 9 applies. We may process this data in the following circumstances:

- In limited circumstances, with your explicit consent;
- Where we need to carry out our legal obligations or exercise specific rights in relation to employment;
- Where it is necessary for reasons of substantial public interest, such as safeguarding or equal opportunities monitoring;
- Where it is needed in relation to legal claims or where it is necessary to protect your vital interests, or someone else's vital interests, and you are not capable of giving your consent.

Where required, we will also comply with the relevant conditions and safeguards set out in Schedule 1 of the Data Protection Act 2018.

Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations.

We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate, we will collect information about criminal convictions as part of the recruitment process, including criminal record self-declarations from shortlisted candidates and relevant DBS checks.

We will not request information about protected convictions or cautions that applicants are not legally required to disclose.

Such information will be processed in accordance with Article 10 of the UK GDPR, the Data Protection Act 2018 and relevant statutory safeguarding guidance.

Sharing Data

We may need to share your data with third parties, including third-party service providers, where required by law, where it is necessary to administer the recruitment process or where we have another lawful basis for doing so.

These include the following:

- Academic or regulatory bodies to validate qualifications and experience, including the Teaching Regulation Agency (TRA);
- Referees;
- Other schools, where relevant;
- HR advisers and professional advisers;
- The Disclosure and Barring Service (DBS);
- Recruitment and supply agencies, including recruitment system providers;
- Authorised staff within St Oscar Romero Catholic Academy Trust;
- The Local Authority, Department for Education and other relevant statutory bodies, where necessary;
- The Home Office and occupational health providers, where appropriate.

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Where appropriate, information will be anonymised, but this may not always be possible.

The recipients of the information will be subject to appropriate confidentiality and data protection obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

Where personal information is transferred outside the United Kingdom, we will ensure that appropriate safeguards or another lawful transfer mechanism are in place in accordance with UK data protection legislation. Further information can be obtained from the Trust's Data Protection Officer.

Retention Periods

We keep the personal data 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 data will depend on whether your application is successful and you become employed by us, the nature of the data concerned and the purposes for which it is processed.

We will keep recruitment data, including interview notes, in accordance with our Data Retention Policy, taking into account the limitation periods for potential claims such as race or sex discrimination, including any applicable extensions arising from early conciliation, after which they will be destroyed.

If there is a clear and lawful reason for keeping recruitment records for longer, we may do so but will first consider whether the records can be pseudonymised and determine the appropriate retention period.

If your application is successful, we will keep only the recruitment data that is necessary in relation to your employment.

DBS certificate information will be retained in accordance with relevant DBS requirements and statutory guidance.

Once we have finished recruitment for the role you applied for, we will store your information in accordance with the applicable Data Retention Policy and records retention schedule. Further information can be obtained from the school office or the Trust's Data Protection Officer.

Security

We have put in place measures to protect the security of your information against it being accidentally lost, used or accessed in an unauthorised way.

In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a legitimate need to access it.

You can find further details of our security procedures within our relevant Data Protection, Data Breach and Information Security policies. Further information can be obtained from the school office or the Trust's Data Protection Officer.

Your Rights of Access, Correction, Erasure and Restriction

It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during the recruitment process.

Under certain circumstances, by law, you have the right to:

- **Access your personal information** (commonly known as a subject access request). This allows you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. You will not normally

have to pay a fee to access your personal information. However, we may charge a reasonable fee or refuse to comply with a request where permitted by law.

- **Correction of the personal information we hold about you.** This enables you to have any inaccurate or incomplete information we hold about you corrected.
- **Erasure of your personal information.** You can ask us to delete or remove personal data where the applicable legal conditions are met.
- **Restriction of processing your personal information.** You can ask us to suspend processing personal information about you in certain circumstances, for example, if you want us to establish its accuracy before processing it.
- **Object to processing** in certain circumstances.
- **Data portability**, enabling you to receive or transfer your personal information to another party, where applicable.
- **Exercise your rights relating to automated decision-making**, including applicable safeguards where significant decisions are made solely by automated means.

Where significant decisions are made solely by automated means, we will provide the information and safeguards required by law, including the opportunity to make representations, obtain human intervention and challenge the decision.

If you want to exercise any of the above rights, please contact the Trust's Data Protection Officer.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information or exercise any of your other rights.

Right to Withdraw Consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time.

To withdraw your consent, please contact the Trust's Data Protection Officer.

Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another lawful basis for doing so.

Withdrawal of consent will not affect the lawfulness of processing undertaken before consent was withdrawn.

How to Raise a Concern

We hope that the school or the Trust's Data Protection Officer can resolve any query you raise about our use of your information.

We have appointed a Data Protection Officer (DPO) to oversee compliance with data protection legislation and this privacy notice.

If you have any questions or concerns about how we handle your personal information, you can contact the DPO using the details below:

Data Protection Officer: St Oscar Romero Catholic Academy Trust

Address: Shirley Court, c/o Coloma Convent Girls' School, Upper Shirley Road, Croydon, CR9 5AS

Email: DPO@OscarRomero.co.uk

Website: www.oscarromero.co.uk

You have the right to raise a complaint with us regarding the processing of your personal information. We will acknowledge your complaint within 30 days of receipt, investigate your concerns appropriately, keep you informed of progress as appropriate and communicate the outcome without undue delay.

You also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

Website: www.ico.org.uk

Telephone: 0303 123 1113

Changes to this Privacy Notice

We reserve the right to update this privacy notice at any time, and we will make an updated privacy notice available when we make any substantial changes.

We may also notify you in other ways from time to time about the processing of your personal information.