

Guildford High School Applicant Data Protection Policy

Guildford High School is part of the United Church Schools Trust, which trades under the name 'United Learning'

1. Responsibility for Data Protection

- 1.1 As part of the recruitment and selection process, United Learning will use or “process” personal data about you. This policy sets out what personal data we will collect, the purposes for which it is processed and who we may share personal data with.
- 1.2 The Data Controller for all personal information held by UCST is UCST. UCST is registered with the Information Commissioner’s Office (ICO). The registration number is Z53307X.
The Data Controller for all personal information held by ULT (Academy School staff) is ULT. ULT is registered with the Information Commissioner’s Office (ICO). The registration number is Z7415170.
The Data Protection Officer for United Learning is Steve Whiffen. He is responsible for ensuring that the Group complies with Data Protection Law. He can be contacted on company.secretary@unitedlearning.org.uk or on 01832 864538.

2. The categories of personal data held by UL about applicants are

- 2.1 Contact details: Names, address, telephone numbers, email addresses and other contact details;
- 2.2 Recruitment: Information in application forms, CVs, letters of application, references, psychometric tests, equal opportunities monitoring, lesson observations; etc.
- 2.3 Safeguarding checks: Applicants invited to interview will be asked to provide photographic identification, proof of their right to work in the UK and if applicable, qualification certificates. Further checks are undertaken for those who are appointed.

We also process the following special categories of personal data:

- 2.4 Ethnicity
- 2.5 Disability, if relevant to facilitating your application or participation in selection activities

3. The legal basis on which we process this information is:

The legal basis for processing the personal data are:

- to enable us to comply with our legal obligations
- where the processing is necessary for the purposes of United Learning’s legitimate interests as defined in the GDPR.

4. What will United Learning do with the personal data that we collect

Any information held about you will be held securely on file, (either computer or paper-based) and used only for the purposes described in this document. United Learning will use your personal data to:

- Keep recruitment records and track applicant progress;
- Carry out equal opportunities monitoring;
- Communicate with you via electronic methods including email;
- Carry out our legal obligations to confirm that you are entitled to work in the UK;

- Receive references, for example from current or past employers;
- Respond to a request from you regarding your rights under data protection legislation.

If you become a United Learning employee, the information will be used for the purposes of carrying out United Learning's personnel functions and complying with its legal obligations.

5. Data Retention Periods

If you become a United Learning employee we will keep your HR file until seven years after the termination of your employment.

If you do not become an employee, the information will be retained for up to 12 months, and then securely destroyed. If another suitable vacancy arises during that period which we think might suit your skills and experience, we may contact you to make you aware of the vacancy if you have indicated your consent to this on your application form.

6. Data Processors

We use third party data processors to provide us with a management information system, accounts software, cloud storage services, apps and software for use in the classroom and to facilitate the secure transfer of data between the school and central office. This use of data processors will only take place if it is in compliance with the Data Protection Act 1998 and the General Data Protection Regulation.

Decisions on whether we contract with these third party processors are subject to a robust approval process and are based on a detailed assessment of the purpose for which the data processing is required, the level and sensitivity of data involved and the arrangements in place to store and handle the data. To be granted access to pupil level data, data processors must comply with strict terms and conditions covering the confidentiality and handling of data, security arrangements and retention and use of the data.

Data processors currently used by central office and Guildford High School include:

- Access – General Ledger
- Network applicant tracking system – online recruitment
- TES online – online recruitment
- Microsoft Office 365 – productivity tools e.g. email and work processing

7. Sharing Data with third parties (other data controllers)

We will not share your personal data with anyone unless you have asked us to do so or the law and our policies allow us to do so.

8. Your rights as data subject

Data protection legislation gives individuals certain rights which are detailed below. If you wish to exercise these rights please write to Fiona Boulton, Headmistress, or the Group Data Protection Officer Steve Whiffen.

Right of access to personal data “subject access request”

You have the right to access the personal data that the school holds about you. Requests need to be made in writing. We take the security of personal data seriously so we may ask you for proof of identity to verify that you are entitled to the information requested.

Right to withdraw consent

Where we have obtained your consent to specific processing activities you may withdraw this consent at any time.

Right to rectification

You have the right to have the personal data that we hold about you rectified if it is inaccurate or incomplete. We will respond to such requests within one month.

Right to erasure

You have the right to have personal data erased in certain specific circumstances. If you make such a request we will consider whether the right to erasure applies and give you a full and reasoned response.

Right to restrict processing

In certain circumstances you have the right to request that we restrict the processing of your personal data. If you make such a request we will consider whether the right to restrict processing applies and give you a full and reasoned response.

If you have any concerns regarding the processing of your personal data please contact the Data Protection Officer, Steve Whiffen, on 01832 864538 or company.secretary@unitedlearning.org.uk. You can also talk to the Information Commissioners Office on 0303 123 1113 or <https://ico.org.uk/for-the-public/>.