PRIVACY NOTICE FOR APPLICANTS

Kent Catholic Schools' Partnership is committed to protecting the privacy and security of your personal information.

Kent Catholic Schools' Partnership ('the Trust') is a multi-academy trust and a charitable company limited by guarantee (registration number 08176019) whose registered office is Barham Court, Teston, Maidstone, Kent, ME18 5BZ.

The Trust is the Data Controller for all the schools within the Trust.

Schools within the Trust are "data processors".

This privacy notice describes how we collect, store and use personal information about you where we have engaged with each other during the recruitment process in accordance with data protection legislation which means the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 (the Act) and the Privacy and Electronic Communications Regulations (PECR).

The Data Protection Officer can be contacted at dpo@kcsp.org.uk

1: THE PERSONAL DATA WE HOLD

We process data relating to those we engage with during the recruitment process. Personal data that we may collect, use, store and share (when appropriate) about you includes, but is not limited to;

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses
- Date of birth
- Gender
- Marital status and dependants
- Next of kin and emergency contact information
- National Insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Teacher Reference Number
- Recruitment information including copies of right to work documentation, references and other information included in a CV or letter as part of the application process
- Copy of driving licence
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Compensation history;
- Absence data;
- Performance information

- Disciplinary and grievance information, including warnings issued to you
- Photographs;

We may also collect, store and use the following "special categories" of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and political opinions
- Trade union membership
- Information about your health, including any medical condition, health and sickness records
- Genetic information and biometric data
- Information about your criminal record/allegations and offences

To support us to comply with Keeping Children Safe in Education we will ask shortlisted candidates to provide us with details of social media profiles so that we may check information publicly available so we may assess your suitability to work with children and young people.

Use of your personal data for filtering and monitoring purposes

While you're in our school, we may monitor your use of our information and communication systems, equipment and facilities (e.g. school computers). We do this so that we can:

- Comply with health and safety and other legal obligations
- Comply with our policies (e.g. child protection policy, IT acceptable use policy) and our legal obligations
- Keep our network(s) and devices safe from unauthorised access, and prevent malicious software from harming our network(s).

2: OUR LAWFUL BASIS FOR USING THIS DATA

We will only collect and use personal information about you when the law allows us to. We may use personal information about you where you have given us consent to use it in a certain way or where we need to carry out a task in the public interest.

Where you have provided us with consent to use your data, you may withdraw this consent at any time. We will make this clear when requesting your consent, and explain how you go about withdrawing consent if you wish to do so.

Some of the reasons listed above for collecting and using personal information about you may overlap, and there may be several grounds which justify the Trust's use of your data.

3: HOW IS YOUR PERSONAL INFORMATION COLLECTED?

We typically collect personal information about candidates through the application and recruitment process, either directly from candidates or sometimes from an employment agency or background check provider. We may sometimes collect additional information from third parties including former employers, the Local Authority or other background check agencies including, but not limited to;

- Her Majesty's Revenue and Customs HMRC
- The Disclosure and Barring Service
- Teaching Regulation Authority

4: HOW WE WILL USE INFORMATION ABOUT YOU

We will only use your personal information when the law allows us to and;

- To make a decision about the recruitment process or to make an appointment;
- Determining the terms on which you work for us;
- Checking you are legally entitled to work in the UK;
- Checking the award of Qualified Teacher Status, completion of teacher induction and prohibitions, sanctions and restrictions that might prevent the individual from taking part in certain activities or working in specific positions via the Teacher Services Online platform
- To maintain our single central record and to comply with our general safeguarding obligations

Change of purpose
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. If we need to use your personal information for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal information without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

5: HOW WE USE PARTICULARLY SENSITIVE PERSONAL INFORMATION

"Special categories" of particularly sensitive personal information require us to ensure higher levels of data protection. We need to have further justification for collecting, storing and using this type of personal information. We may process special categories of personal information in the following circumstances:

(a) In limited circumstances, with your explicit written consent.
(b) Where we need to carry out our legal obligations or exercise our employment-related rights and in line with our data protection policy.
(c) Where it is needed in the public interest, such as for equal opportunities monitoring and in line with our data protection policy.

6: DATA SHARING

We do not share information about you with any third party without your consent unless the law and our policies allow us to do during the recruitment process.

We may share your information with the Archdiocese of Southwark including the Education Commission for the purposes of your application.

7. DATA SECURITY

We have put in place measures to protect the security of your information. Details of these measures are available in the Trust Information Security Policy which is available on our website.

8. DATA RETENTION

How long will we use your information for?
We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, insurance or reporting requirements. Details of retention periods for different aspects of your personal information are available in our Records Management Policy which is available on our website.

To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

In some circumstances we may anonymise your personal information so that it can no longer be associated with you, in which case we may use such information without further notice to you.

9. RIGHTS OF ACCESS, CORRECTION, ERASURE, AND RESTRICTION

Your duty to inform us of changes

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 your working relationship with us.

Your rights in connection with personal information

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

- **Request access** to your personal information (data subject access request). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer** of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact the Data Protection Officer (DPO) in writing (dpo@kcsp.org.uk).

The legal timescales for the Trust to respond to a Subject Access Request is one calendar month. As the Trust has limited staff resources outside of term time, we encourage employees to submit Subject Access Requests during term time and to avoid sending a request during periods when the Trust or a school is closed or is about to close for the holidays where possible. This will assist us in responding to your request as promptly as possible. For further information about how we handle Subject Access Requests, please see our Data Protection Policy.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is manifestly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you
We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

10. 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 DPO. 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 legitimate basis for doing so in law.

11. DATA PROTECTION OFFICER

We have appointed a Data Protection Officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO (dpo@kcsp.org.uk). You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

You can contact the Information Commissioners Office on 0303 123 1113 or via email https://ico.org.uk/global/contact-us/email/ or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.

12. CHANGES TO THIS PRIVACY NOTICE

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

If you have any questions about this privacy notice, please contact the DPO at dpo@kcsp.org.uk