

## **Data controller: Colfe's School and Colfe's Leisure Services, Horn Park Lane, London SE12 8AW**

As part of any recruitment process, Colfe's School and Colfe's Leisure Services ("Colfe's" collects and processes personal data relating to job applicants. Colfe's is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does Colfe's collect?**

Colfe's collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration;
- whether or not you have a disability for which Colfe's needs to make reasonable adjustments during the recruitment process; and
- information about your entitlement to work in the UK.

Colfe's may collect this information in a variety of ways. For example, data might be contained in application forms, CVs or resumes, obtained from your passport or other identity documents, or collected through interviews or other forms of assessment.

Colfe's may also collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers and information from criminal records checks. Colfe's will seek information from third parties only once a provisional job offer to you has been made and will inform you that it is doing so.

Data will be stored in a range of different places, including on your application record, in HR management systems and on other IT systems (including email).

### **Why does Colfe's process personal data?**

Colfe's needs to process data to take steps at your request prior to entering into a contract with you. It may also need to process your data to enter into a contract with you.

In some cases, Colfe's needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check a successful applicant's eligibility to work in the UK before employment starts.

Colfe's has a legitimate interest in processing personal data during the recruitment process and for keeping records of the process. Processing data from job applicants allows Colfe's to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. Colfe's may also need to process data from job applicants to respond to and defend against legal claims.

Colfe's may process special categories of data, such as information about ethnic origin, sexual orientation or religion or belief, to monitor recruitment statistics. It may also collect information about whether or not applicants are disabled to make reasonable adjustments for candidates who have a

disability. Colfe's processes such information to carry out its obligations and exercise specific rights in relation to employment.

Colfe's is obliged to seek information about criminal convictions and offences. Where Colfe's seeks this information, it does so because it is necessary for it to carry out its obligations and exercise specific rights in relation to employment.

If your application is unsuccessful, Colfe's may keep your personal data on file in case there are future employment opportunities for which you may be suited. Colfe's will ask for your consent before it keeps your data for this purpose and you are free to withdraw your consent at any time.

### **Who has access to data?**

Your information may be shared internally for the purposes of the recruitment exercise. This includes members of the HR and recruitment team, interviewers involved in the recruitment process and IT staff if access to the data is necessary for the performance of their roles.

Colfe's will not share your data with third parties, unless your application for employment is successful and it makes you an offer of employment. Colfe's will then share your data with former employers to obtain references for you, employment background check providers to obtain necessary background checks and the Disclosure and Barring Service to obtain necessary criminal records checks if required.

Colfe's will not transfer your data outside the European Economic Area.

### **How does Colfe's protect data?**

Colfe's takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

### **For how long does Colfe's keep data?**

If your application for employment is unsuccessful, Colfe's will hold your data on file for 6 months after the end of the relevant recruitment process. If you agree to allow Colfe's to keep your personal data on file, Colfe's Schools will hold your data on file for a further 6 months for consideration for future employment opportunities. Alternatively you may provide Colfe's with consent to retain your information indefinitely. At the end of that period, or once you withdraw your consent, your data is deleted or destroyed.

If your application for employment is successful, personal data gathered during the recruitment process will be transferred to your personnel file and retained during your employment. The periods for which your data will be held will be provided to you in the staff privacy notice and our data retention and storage policy.

### **Your rights**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require Colfe's to change incorrect or incomplete data;

- require Colfe's to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing; and
- object to the processing of your data where Colfe's is relying on its legitimate interests as the legal ground for processing.

If you would like to exercise any of these rights, please contact Mr Max Adamson, Colfe's School Bursar at [bursar@colfes.com](mailto:bursar@colfes.com)

If you believe that Colfe's School has not complied with your data protection rights, you can complain to the Information Commissioner's Office (ICO) although the ICO recommends that steps are taken to resolve the matter with the School before involving the regulator.

### **What if you do not provide personal data?**

You are under no statutory or contractual obligation to provide data to Colfe's during the recruitment process. However, if you do not provide the information, Colfe's may not be able to process your application properly or at all.

### **Automated decision-making**

Recruitment processes are not based solely on automated decision-making.

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