



## **Bedgrove Infant School**

# **Privacy Notice – Job Applicants**

**Last reviewed and approved: Autumn 2025**

**Next review date: Autumn 2026**

**Appendices Included:**

None

**Modifications 2024:**

TIO GDPR -104 Version: 1.01 Release date: August 2025

Governor comment and Additional GDPR and ICO-Aligned Enhancements section added

# Job Applicant Privacy Notice

## Introduction

Under UK data protection law, individuals have a right to be informed about how our school uses any personal data that we hold about them. We, therefore, have an obligation to comply with this right by providing 'privacy notices' to individuals where we are processing their personal data.

This privacy notice explains how we collect, store and use personal data about individuals applying for jobs at our school.

We, Bedgrove Infant School, Ingram Avenue, Aylesbury, HP21 9DJ, 01296 481353, are the 'data controller' for the purposes of UK data protection law.

Our data protection officer is Karen Herring (see 'Contact us' below).

## The personal data we hold:

We collect the following data:

- Contact details
- Copies of right to work documentation
- Proof of living abroad, if required,
- Health Check – fit to work
- References
- Evidence regarding qualifications
- Employment records, including work history, job titles, training records and professional memberships

We may also collect, use, store, and share (when appropriate) information about you that falls into 'special categories' of more sensitive personal data. This includes, but is not limited to:

- Information relating to race, ethnicity, religious beliefs, sexual orientation, and political opinions
- Information relating to disability and access requirements
- Photographs and CCTV images captured in school

We may also collect, use, store, and share (when appropriate) information regarding criminal convictions and offences.

We may also hold data about you that we have received from other organisations, including other schools and social services, and the Disclosure and Barring Service in respect of criminal offence data.

## Why we use this data

We use the data listed above to:

- Enable us to establish relevant employment experience and qualifications
- Facilitate safe recruitment, as per our safeguarding obligations towards our pupils/students
- Enable equalities monitoring
- Ensure that appropriate access arrangements are provided for candidates that require them

## Use of your personal data in automated decision making and Profiling

We do not currently process any job applicants' personal data through automated decision making or profiling. If this changes in the future, we will amend any relevant privacy notices, to explain the processing to you, including your right to object to it.

## Our lawful basis for using this data

The lawful bases for processing personal information are:

- In accordance with the 'public task' basis to process data to fulfil our official duties
- in accordance with the 'legal obligation' basis to process data to meet our responsibilities
- In accordance with the 'consent' basis we will get consent from you to use your personal data
- In accordance with the 'vital interests' basis we will use this personal data in a life-or-death situation
- In accordance with the 'contract' basis we need to process personal data to fulfil a contract with you or to help you enter into a contract with us
  - In accordance with the 'legitimate interests' basis where there is a minimal privacy impact and we have a compelling reason

## Our Basis for Using Special Category Data

The lawful bases for processing 'special category' data collected (more sensitive personal information) use the following conditions for processing as set out in UK data protection law:

- We obtained your explicit consent to use your information in a certain way
- We need to use your information under employment, social security, or social protection law
- We need to protect an individual's vital interests (i.e., protect your life or someone else's life), in situations where you are physically or legally incapable of giving consent
- The information has already been made obviously public by you
- We need to use it to make or defend against legal claims
- We need to use it for reasons of substantial public interest as defined in legislation
- We need to use it for health or social care purposes, and it is used by, or under the direction of, a professional obliged to confidentiality under law

- We need to use it for public health reasons, and it is used by, or under the direction of, a professional obliged to confidentiality under law
- We need to use it for archiving purposes, scientific or historical research purposes, or for statistical purposes, and the use is in the public interest
- We need to use it as part of legal proceedings, to obtain legal advice, or to make or defend against legal claims
- For criminal offence data, we will only collect and use it when we have both a lawful basis, as set out above, and a condition for processing as set out in UK data protection law.

Conditions

## Collecting this Data

While most of the information we collect about you is mandatory, there is some information that can be provided voluntarily.

Whenever we seek to collect information from you, we make it clear whether you must provide this information (and if so, what the possible consequences are of not complying), or whether you have a choice.

Most of the data we hold about you will come from you, but we may also hold data about you from:

- Local authorities
- Government departments or agencies
- Police forces, courts, or tribunals

## How we Store this Data

We keep personal information about you during the application process, but we may also keep it for longer if this is necessary. Our record retention schedule/records management policy sets out how long we keep information about applicants.

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used, or accessed in an unauthorised way, altered or disclosed.

We will dispose of your personal data securely when we no longer need it.

## Who we Share Data with

We do not share information about you with any third party without consent, unless the law and our policies allow us to do so.

Where it is legally required, or necessary (and it complies with UK data protection law), we may share personal information about you with:

- Our Local Authority Buckingham Council – to meet our legal obligations to share certain information with it, such as any safeguarding concerns

- Suppliers and service providers – to enable them to provide the service we have contracted them for, such as HR and recruitment support
- Employment and recruitment agencies

## **Transferring Data Internationally**

We may share personal information about you with the following international third parties, where different data protection legislation applies:

Where we transfer your personal data to a third-party country or territory, we will do so in accordance with UK data protection law.

In cases where we must set up safeguarding arrangements to complete this transfer, you can get a copy of these arrangements by contacting us. (See 'Contact' below)

## **Your Rights: How to Access Personal Information that we hold about you**

You have a right to make a 'subject access request' to gain access to personal information that we hold about you.

If you make a subject access request, and if we do hold information about you, we will (subject to any exemptions that may apply):

- Give you a description of it
- Explain why we are holding and processing it, and how long we are retaining it for
- Tell you where we got it from, if not from you
- Explain to you who it has been, or will be, shared with
- Inform you as to whether any automated decision-making is being applied to the data, and any consequences of this
- Give you a copy of the information in an intelligible form

You may also have the right for your personal information to be transmitted electronically to another organisation in certain circumstances.

If you would like to make a request, please contact us. (See 'Contact' below)

## **Your Other Rights Regarding your Data**

Under UK data protection law, you have certain rights regarding how your personal data is used and kept safe. For example, you have the right to:

- Object to our use of your personal data
- Prevent your data being used to send direct marketing
- Object to and challenge the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than by a person)
- In certain circumstances, have inaccurate personal data corrected

- In certain circumstances, have the personal data we hold about you deleted or destroyed, or restrict its processing
- Withdraw your consent, where you previously provided it for the collection, processing, and transfer of your personal data for a specific purpose
- In certain circumstances, be notified of a data breach
- Make a complaint to the Information Commissioner's Office
- Claim compensation for damages caused by a breach of the data protection regulations

## Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading, or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

<https://ico.org.uk/make-a-complaint/>

Or call on 0303 123 1113 or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

## Further information

### Contact

If you would like to discuss anything in this privacy notice, In the first instance please contact the School Data Protection Lead below:

Position	Name	Email	Phone
School lead	Karen Herring	office@bedgroveinfant.co.uk	01296 481353
Data Protection Officer	Turn it on	<dpr@turniton.co.uk	01865 597620 option 3

### Complaints

If you have a complaint, we ask that you raise this with us in the first instance. Under the Data Usage and Access Act 2025, a complaint should be investigated thoroughly by the company first. Should the outcome conclude escalation is required, the Information Commissioners Office will be informed. To raise a complaint, please email: [dpo@turniton.co.uk](mailto:dpo@turniton.co.uk) or call 01265 537 620 (option 3)

Should you still wish to contact the ICO, you can do so at <http://ico.org.uk/concerns/> or call 0303 123 1113

### Additional GDPR and ICO-Aligned Enhancements

Additional GDPR and ICO-Aligned Enhancements:

- Safeguarding & Disciplinary Data:** We may collect information on previous safeguarding allegations or disciplinary matters relevant to working with children, where lawful and necessary for safer recruitment. We may collect data from online public sources (e.g. LinkedIn or professional registers) for verification of qualifications or employment history.
- Criminal Offence Data:** For criminal offence data, we rely on Article 10 UK GDPR and Schedule 1 of the Data Protection Act 2018 (particularly paragraphs 1, 2, 10, 18) where relevant to employment, safeguarding, or legal claims.
- Data Minimisation:** If you fail to provide information when requested, we may be unable to process your application properly or at all. We will not collect more data than necessary for the stated purposes ('data minimisation') and will ensure it is kept accurate and up to date.
- Retention & Security:** Recruitment data will typically be retained for 6 months after the recruitment process unless you are successful, in which case it will become part of your employee record. In some cases (e.g. safeguarding investigations or legal claims), data may be retained for longer in line with statutory requirements. We regularly review our technical and organisational

security measures, including encryption, password protection, and access controls.

5. **Third-Party Processors:** We ensure that all third-party processors acting on our behalf (e.g., recruitment platforms, HR software providers) are bound by contractual obligations that comply with Article 28 of the UK GDPR. We will not sell or rent your data to third parties. Where data is shared for safeguarding, it will be done on a strict 'need-to-know' basis and with appropriate safeguards in place.

6. **International Transfers:** Where personal data is transferred outside the UK, we will ensure an appropriate transfer mechanism is in place (such as an adequacy decision, International Data Transfer Agreement, or Standard Contractual Clauses). You can request details of these transfer safeguards from our Data Protection Officer.

7. **Your Rights:** Under the UK GDPR, your rights include the right of access, rectification, erasure ('right to be forgotten'), restriction of processing, data portability, objection, withdrawal of consent, and to lodge a complaint with the ICO. You also have the right to be informed if your data is subject to a high-risk breach likely to result in a risk to your rights and freedoms.

8. **Complaints:** If you are dissatisfied with how we handle your complaint, you have the right to escalate it directly to the ICO without first contacting us, although we encourage you to allow us the opportunity to resolve it internally.

9. **DPIA Statement:** The school conducts Data Protection Impact Assessments (DPIAs) for high-risk processing, particularly in recruitment systems or when processing special category data.

10. **Children's Data:** Where applicants are under 18 (e.g., apprentices or work experience), the school applies additional protections and processes data in accordance with safeguarding and child protection policies.

This privacy notice was last updated on November 2025 and is kept under regular review.