



St Martin's School

N O R T H W O O D

A3c Privacy Notice For Job Applicants

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Policy owner: Bursar

To be reviewed by: Leadership Team and Governance & Risk Committee



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Introduction

This privacy notice describes how we collect and use personal information about you during and after your work relationship with us, in accordance with the UK General Data Protection Regulation (UK GDPR).

Following Brexit, Regulation (EU) 2016/679, General Data Protection Regulation (GDPR) was incorporated into UK law as retained EU law and is now known as the UK GDPR. The UK GDPR operates alongside the Data Protection Act 2018, which supplements it by setting out additional provisions on matters such as the processing of personal data in specific sectors, exemptions, the powers of the Information Commissioner, and enforcement. The Data (Use and Access) Act 2025 further amends both the UK GDPR and Data Protection Act 2018 to modernise UK data protection rules and clarify certain rights and obligations. The GDPR continues to apply within the EU and to organisations that process personal data of individuals located in the EU.

This privacy notice applies to all job applicants. Successful candidates should refer to our privacy notice for staff for information about how their personal data is stored and collected.

Who Collects the Information

St Martin's School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

St Martin's School,
40 Moor Park Road
Northwood
Middlesex HA6 2DJ
01923 825740
office@stmartins.org.uk

Data Protection Principles

We will comply with the data protection law and principles when gathering and using personal information, as set out in our *Privacy Notice for Staff (A3d)*. This means that your data will be:

- Used lawfully, fairly and in a transparent way.
- Collected only for valid purposes that we have clearly explained to you and not used in a way that is incompatible with those purposes.
- Relevant to the purposes we have told you about and limited only to those purposes.

- Accurate and kept up to date.
- Kept only as long as necessary for the purposes we have told you about.
- Kept safely and securely.

About the Information We Collect and Hold

The table in Part 1 of the Schedule below summarises the information we collect and hold, up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of the Schedule below summarises the additional information we collect before making a final decision to recruit, i.e. before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

Where Information May Be Held

Information may be held on the School's premises in our filing systems and on our servers. It may also be held on our behalf by third party agencies, service providers and representatives.

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 to enter into a contract with you;
- Where we need to comply with a legal obligation (such as health and safety legislation, under statutory codes of practice and employment protection legislation);
- Where it is needed in the public interest or for official purposes;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests, rights and freedoms do not override those interests.
- Where you have provided your consent for us to process your personal data.

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”) require higher levels of protection and further justification for collecting, storing, and using this type of personal information. We may process this data in the following circumstances:

- In limited circumstances, with your explicit written consent;
- Where we need to carry out our legal obligations in line with our data protection policy;
- For reasons of substantial public interest, such as for equal opportunities monitoring;
- To establish, exercise or defend legal claims;
- Where it is necessary to protect your vital interests (or those of another person) and you are unable to give consent.

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 working relationship with you or where we have another legitimate interest in doing so.

These include the following: -

- Academic or regulatory bodies to validate qualifications/experience (for example the teaching agency);
- Referees;
- Other schools;
- HR advisors and professional advisers;
- The DBS to carry out background checks where legally required;
- Recruitment and supply agencies;

We may share applicant information with other schools within the Haberdashers' Elstree Schools Group where you have consented to this as part of the recruitment process.

We may also need to share some of the above categories of personal information with other parties, such as our legal or professional advisers. Where possible, information will be anonymised, but this may not always be feasible.

All recipients are required to handle personal data securely and only for the purposes for which it was shared. We may also be required to share some personal information with our regulators or as required to comply with the law.

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) for no longer than is reasonable, taking into account the limitation periods for potential claims such as race or sex discrimination (as extended to take account of early conciliation), after which they will be destroyed. If there is a clear business reason for keeping recruitment records for longer than the recruitment period, we may do so but will first consider whether the records can be pseudonymised or anonymised, and the longer period for which they will be kept.

If your application is successful, we will keep only the recruitment data that is necessary in relation to your employment. For further information, see the Staff Privacy Notice (A3d).

Once we have finished recruitment for the role you applied for, we will then store your information in accordance with our Retention Policy (A2). This is available from the school office on request.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

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 your working relationship with us.

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 we are lawfully processing it. You will not have to pay a fee to access your personal information. However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.
- Correction of the personal information we hold about you. This enables you to have any inaccurate information we hold about you corrected.
- Erasure of your personal information. You can ask us to delete or remove personal data if there is no good reason for us continuing to process it.

- 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.
- To object to processing in certain circumstances (for example for direct marketing purposes).
- To transfer your personal information to another party.

If you want to exercise any of the above rights, please contact our Bursar, Alison Curran, who can be contacted by e-mail (bursar@stmartins.org.uk) in writing.

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).

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 our Bursar, Alison Curran, who can be contacted by e-mail (bursar@stmartins.org.uk). 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.

Keeping Your Personal Information Secure

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected personal data breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Automated Decision Making

St Martin's School does not make decisions about job applicants based solely on automated processing. All recruitment and selection decisions involve meaningful human review.

If this position changes in the future (for example, if we introduce automated screening or scoring tools) we will update this notice and provide you with information about the logic involved and your rights in relation to such processing.

Contact

If you would like to discuss anything within this privacy notice or have a concern about the way we are collecting or using your personal data, we request that you raise your concern with our Bursar, Alison Curran in the first instance. We will acknowledge receipt of your complaint within 30 calendar days, and we will investigate and respond without undue delay. Further information about the way we handle data protection complaints can be found in our A1 Data Protection Policy, available on our website.

We have appointed a data protection officer (DPO) to oversee compliance with data protection and this privacy notice. If you have any questions about how we handle your personal information which cannot be resolved by Alison Curran then you can contact the DPO on the details below:

Data Protection Officer: Judicium Consulting Limited

Address: 5th Floor, 98 Theobalds Road, London, WC1X 8WB

Email: dataservices@judicium.com

Web: www.judiciumeducation.co.uk

Should you remain dissatisfied with our response, you also have the right to make a complaint to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

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

Categories of Information We Collect, Process, Hold and Share

Part 1 Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Your current and any former names, title, date of birth, gender, national insurance	From you	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to progress your	To enable staff involved in the recruitment process to contact you to progress your application, arrange

number, and contact details (i.e. current address, home and mobile phone numbers, email address)		application, arrange interviews and inform you of the outcome at all stages	interviews and inform you of the outcome To inform the relevant manager or department of your application
Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit	To make an informed recruitment decision To support a fair and objective recruitment process, applications may be anonymised during the shortlisting stage. Staff involved in shortlisting may only have access to candidate reference numbers and information relevant to the selection criteria. Identifying personal information will normally only be made available once candidates have been selected for interview.
Your name, contact details and details of your qualifications, experience, employment history and interests	From you, in the completed application form and interview notes (if relevant)	Legitimate interest: to carry out a fair recruitment process Consent (if given): if you are unsuccessful in your application, we may retain your details and, where appropriate, share them with other schools within the Haberdashers' Elstree Schools Group where suitable vacancies arise. We will only do	To see whether an associated School has any suitable vacancies

		so with your consent.	
Information about you that is publicly available online through online searches	From standard online searches using a web browser, website, or social media platform.	Legitimate interest: to form part of the School's wider safeguarding due diligence. Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE).	To make an informed recruitment decision. The member of staff carrying out the search, if not involved in the decision-making process, may share any relevant information related to suitability with the individuals who will be interviewing. This way the decision makers will only have the relevant information that may need to be addressed at interview and will not be exposed to other information). Search results will be reviewed and, if appropriate, explored with the applicant at interview. To comply with legal/regulatory obligations. For further information, see * below
Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs	From you, in a completed anonymised equal opportunities monitoring form	To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)	To comply with our equal opportunities monitoring obligations and to follow our equality and other policies



			For further information, see * below
Details of your referees	From your completed application form	Legitimate interest: to carry out a fair recruitment process To comply with our legal obligations to request references	To carry out a fair recruitment process To comply with legal/regulatory obligations Information shared with relevant managers, HR personnel and the referee
Criminal Record Information or information that would make you unsuitable to work with children	From your self-declaration form	Legitimate interests: to carry out a fair recruitment process including giving candidates the opportunity to discuss their disclosure with the School before a DBS check is obtained. To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	To make an informed recruitment decision and given candidates the opportunity to discuss their disclosure with the School. To comply with legal/regulatory obligations For further information, see * below

Part 2 Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time keeping and attendance, the reason you left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "<i>Keeping Children Safe in Education</i>" (KCSIE), from references obtained about you from previous employers and/or education providers ☐	From your referees (details of whom you will have provided)	Legitimate interest: to make an informed decision to recruit To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	To obtain the required reference about you To comply with legal/regulatory obligations Information shared with relevant managers and HR personnel The reference is confidential and will not be shared with you unless we are required or able to do so.
In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances	From a letter from the professional regulating authority in the country (or countries) in	Legitimate interest: to make an informed decision to recruit To comply with our legal	To comply with legal/regulatory obligations Information shared with relevant

impacting your suitability to teach ☐	which you have worked	obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE). Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice	managers and HR personnel Information shared with DBS and other regulatory authorities as required
Information regarding your academic and professional qualifications ☐	From you, from your education provider, from the relevant professional body	Legitimate interest: to verify the qualifications information provided by you To comply with our legal obligations	To make an informed recruitment decision
Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and, where	From the original check and any updated status checks from the Disclosure and Barring Service (DBS) From overseas jurisdictions in accordance	To perform the employment contract To comply with our legal obligations Legitimate interest: For reasons of substantial	To make an informed recruitment decision To carry out statutory checks Information shared with DBS and other regulatory

appropriate, overseas criminal records checks ☐	with Home Office guidance In respect of agency and third-party staff (supply staff), from any agency or third party organisation In respect of fee-funded trainee teachers, from the initial teacher training provider	public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)	authorities as required For further information, see * below
Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information ☐	From you and, where necessary, the Home Office	To enter into/perform the employment contract To comply with our legal obligations Legitimate interest: to maintain employment records	To carry out right to work checks Information may be shared with the Home Office
Information regarding your health, including your medical history, present health status and any workplace adjustments required ☐	From you, including via a health questionnaire and medical examination	To comply with our legal obligations including those contained in the Equality Act 2010 and statutory guidance for schools: <i>Keeping</i>	To make an informed recruitment decision To comply with legal/regulatory obligations including considering

		<i>Children Safe in Education</i> (KCSIE)	adjustments necessary to enable you to perform the role for which you have applied Information shared with the School's medical advisers including the School doctor and occupational health adviser Information shared with medical adviser carrying out your medical examination
A copy of your driving licence ☐	[From you]	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To ensure that you have a clean driving licence if relevant to your role Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our staff privacy policy (A3d)



available on request during the recruitment process and accessible to all staff if successfully employed.