

# Privacy Notice



## Who Collects this Information

The BRIT School is a "data controller" of personal data and gathers and uses certain data about you. This means that we are responsible for deciding how we hold and use personal information about you.

We are required under data protection legislation to notify you of the information contained in this privacy notice. This notice does not form part of any contract of employment or other contract to provide services and we may update this notice at any time.

It is important that you read this notice, together with any other policies mentioned within this privacy notice. This will assist you with understanding how we process your information and the procedures we take to protect your personal data.

## Data Protection Principles

We will comply with the data protection principles when gathering and using personal information, as set out in our data protection policy.

## How we use Job Applicant Data

The BRIT School is committed to protecting your privacy and being transparent about what we do with it. We are committed to using your personal information in accordance with all applicable laws concerning the protection of personal information. We will not do anything with your information you wouldn't reasonably expect or that is required of us by law. We will use the information that we collect about you in accordance with the UK General Data Protection Regulation (UK GDPR).

The BRIT School is the data controller for all applicant data collected and handled.

## The categories of applicant information that we collect, hold, and share

We may collect, store and use the following categories of personal information about you up to the shortlisting stage of the recruitment process: -

### Personal Data:

- **Personal information:** name, DfE number (teachers), address, telephone number(s), email address, qualifications, education and previous employment details.
- **Emergency contact information** such as names, relationship, phone numbers and email addresses;
- **Post Interview Information:** Interview notes, test results
- **Information collected during the recruitment process** that we retain during your employment including **proof of right to work in the UK**, information entered on the application form, CV, qualifications;
- **Details of your employment history** including job titles, salary and working hours;
- **Details of your referees and references;** name, address, telephone number(s), email address
- **Details collected through any pre-employment checks** including online searches for data;

### Sensitive Personal Data:

- **Characteristics:** ethnicity, nationality, date of birth, sex, sexual orientation or religious or similar beliefs.
- **Disability:** Any disclosed disability
- **Child Protection Information:** Any disclosed criminal convictions/your criminal record as required by law to enable you to work with children;

Data is collected from the applicant when applying to work with The BRIT School.

We may also collect information after the shortlisting and interview stage in order to make a final decision on where to recruit:

- Data about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers;
- Data regarding your academic and professional qualifications;
- Data regarding your criminal record, in a criminal records certificate (CRC) or enhanced criminal records certificate (ECRC) as appropriate;
- Your nationality and immigration status and data from related documents, such as your passport or other identification and immigration information;
- A copy of your driving licence; and
- Data relating to your health.

## How We Collect this Information

We may collect this information from you, your referees, your education provider, by searching online resources, from relevant professional bodies the Home Office and from the DBS.

## Why we collect and use this 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") requires 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;
- Where it is needed in the public interest, such as for equal opportunities monitoring (or in relation to our pension scheme);
- Where it is needed in relation to legal claims or where it is necessary to protect your interests (or someone else's interests) and you are not capable of giving your consent.

## Criminal Convictions

We may only use information relating to criminal convictions where the law allows us to do so. This will usually be where it is necessary to carry out our legal obligations. We will only collect information about criminal convictions if it is appropriate given the nature of the role and where we are legally able to do so.

Where appropriate we will collect information about criminal convictions as part of the recruitment process or we may be notified of such information directly by you in the course of working for us.

## 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;
- DBS; and
- Recruitment and supply agencies.
- Our Local Authority in order to meet our legal obligations for sharing data with it;

We may also need to share some of the above categories of personal information with other parties, such as HR consultants and professional advisers. Usually, information will be anonymised but this may not always be possible. The recipients of the information will be bound by confidentiality obligations. We may also be required to share some personal information with our regulators or as required to comply with the law.

## The lawful basis on which we collect and use this information

All personal and sensitive data held by The BRIT School will be processed fairly, lawfully and in a transparent manner. We will only

use the data for the purposes specified above, and for explicit and legitimate purposes.

The BRIT School will collect and hold personal and sensitive personal data for the following lawful basis:

- Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller (
- Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject; (Article 9, Section 2.g of the General Data Protection Regulation (EU) 2016/679).
- Equality Act 2010
- Employment Tribunal

## Storing Applicant Information

We hold Applicant data in secure digital and physical storage. We will retain records up to 6 months for applicants. For an exhaustive list of retention periods, please refer to The BRIT School Data Retention Schedule, which can be found on our website: [www.brit.croydon.sch.uk/policies](http://www.brit.croydon.sch.uk/policies) \*\*\*

## System Used for Processing Applicant Data

	PERSONAL DATA	SENSITIVE DATA
Spreadsheet	✓	✓
SAMPeople Recruit	✓	✓

## Information Sharing

The BRIT school will not share your information for marketing purposes with the companies outside The BRIT School.

We routinely share Applicant information with the following:

- Relevant SLT and Line Manager in Recruitment process - Our local authority;

## Why we share Applicant information

We do not share information about our Applicant with anyone without consent unless the law and our policies allow us to do so.

We share applicant data with the relevant Senior Leader and Line Manager of those carrying out the recruitment process in order to shortlist for the role. Sensitive data will not be shared prior to interviews.

## Security

We have put in place measures to protect the security of your information (i.e. against it being accidentally lost, used or accessed in an unauthorised way). In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. Details of these measures are available on our School Website under the Data Protection section: <https://www.brit.croydon.sch.uk/dataprotection>.

You can find further details of our security procedures within our Data Breach policy and our Information Security policy, which can be found on our School Website under the Data Protection section: <https://www.brit.croydon.sch.uk/dataprotection>.

## Requesting access to your personal data

Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact Human Resources ([personnel@brit.croydon.sch.uk](mailto:personnel@brit.croydon.sch.uk))\*\*\*

**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.**

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).

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.

## 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 Human Resources ([personnel@brit.croydon.sch.uk](mailto:personnel@brit.croydon.sch.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.

## How to Raise a Concern

We hope that Human Resources ([personnel@brit.croydon.sch.uk](mailto:personnel@brit.croydon.sch.uk)) can resolve any query you raise about our use of your information in the first instance.

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 Human Resources, then you can contact the DPO on the details below: -

Data Protection Coordinator ([dpobrit@brit.croydon.sch.uk](mailto:dpobrit@brit.croydon.sch.uk)).

Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

## 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.

## Contact

If you would like to discuss anything in this privacy notice, please contact:

### Data Protection Officer

Craig Stilwell  
Judicium Consulting Limited 72 Cannon Street  
London EC4N 6AE

Tel: 020 326 9174

Email: [dataservices@judicium.com](mailto:dataservices@judicium.com)

### Human Resources

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