



# EPSOM

## COLLEGE

### **RECRUITMENT PRIVACY POLICY**

As part of the staff recruitment process for Epsom College (“the College”), the College will collect and process personal information relating to those individual’s applying for employment with the College (“applicants”). The College is committed to being transparent about how it collects and uses that information and to meeting its information protection obligations.

This privacy notice is non-contractual and can be amended at any time.

#### **1. What personal information does the College collect?**

The College collects a range of information about applicants. This includes:

- (a) Name, title, address, marital status, gender and contact details, including email address and telephone number;
- (b) Date of birth;
- (c) Details of qualifications, skills, experience and employment/education history
- (d) Application form, covering letter, interview notes, correspondence relating to the outcome of the recruitment process;
- (e) Information on current salary, including benefit entitlements, and
- (f) CCTV footage captured when you visit the College site.

The College may collect this information directly from applicants in a number of ways. For example, information may be contained in Application Form, CV or resumes, obtained from their passport or other identity documents, or collected through interviews or other forms of assessment.

In line with safer recruitment regulations when working in a school, the College may collect information before an offer of employment has been made or prior to interview, for example references supplied by former employers for teaching posts, information from employment agencies, and information from employment background check providers and information from criminal record checks as required by statutory recruitment regulations.

The College may also collect additional information about shortlisted applicants prior to interview from publicly available browsers including online searches of publically available information and posts and other public platforms.

The College may also process information about:

- (a) An applicant’s entitlement to work in the UK;

- (b) Whether or not the applicant has a disability for which the College needs to make reasonable adjustments during the recruitment process;
- (c) Information on unspent criminal convictions.

## **2. Why does the College process an applicant's personal information?**

The College needs to process information prior to deciding whether to offer employment, which may be an invite to attend an interview. It may also need to process their information to enter into an employment contract with them.

In some cases, the College needs to process information 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.

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

## **3. How is your personal information used by the College?**

The College will use an applicant's personal information in the following ways (this list is not exhaustive):

- (a) Making a decision about recruitment or appointment;
- (b) Managing the recruitment process; and
- (c) Ensuring compliance with legal requirements.

The College will use an applicant's 'special categories' of sensitive personal information in the following ways (this list is not exhaustive):

- (a) It will use a passport and other right to work documentation to check that they are legally entitled to work for the College;
- (b) It may also collect information about whether or not an applicant is disabled to make reasonable adjustments for candidates who have a disability; and
- (c) The College is legally obliged to seek information about criminal convictions and offences.

## **4. Who has access to an applicant's information?**

Information may be shared internally for the purpose of the recruitment process to those who need to know that information. This includes members of the recruitment team, HR and interviewers involved in the recruitment process. If an application is successful, the successful applicant's name and relevant details will also be shared with the manager of the department with the vacancy, relevant operational staff such as H&S, Payroll, Finance and IT staff for them to set up any IT equipment and user id's for them to be able to perform their duties and responsibilities. As an introduction just prior to joining the College applicant's name and job role and where you have come from will be announced in any College information document.

Except in the case of safer recruitment regulations when working in a school, the College will not share an applicant's information with any third parties, unless their application for employment is successful and it makes an offer of employment in which case for example the applicant's contact details may be shared with College's occupational health advisor or the Disclosure and Barring Service for a DBS check.

During the application process, the College will not transfer any information outside the European Economic Area.

### **5. How does the College protect an applicant's personal information?**

The College takes the security of all applicants' personal information very seriously. It has internal policies and controls in place to protect personal information against loss, accidental destruction, misuse or disclosure, and to ensure that information is not accessed, except by employees in the proper performance of their duties. Personal information stored on the Company's systems is secured by Windows Security to ensure only authorised users can access and use information.

Where the College engages third parties to process personal information on its behalf, and do so on the basis of written instructions, they are under a duty of confidentiality and are obliged to implement appropriate technical and other measures to ensure the security of information.

### **6. For how long does the College keep an applicant's personal information?**

If an applicant's application for employment is unsuccessful, the College will hold their information on file for 6 months after the end of the relevant recruitment process.

If an applicant's application for employment is successful, personal information gathered during the recruitment process will be transferred to their personnel file and retained during their employment.

### **7. Data rights**

Applicants have a number of data rights. They can:

- (a) Access and obtain a copy of their personal information on request;
- (b) Require the College to change incorrect or incomplete personal information;
- (c) Require the College to delete or stop processing their personal information, for example where the information is no longer necessary for the purposes of processing;
- (d) Object to or restrict the processing of their personal information where the College is relying on its legitimate interests as the legal ground for processing.

If an applicant wishes to exercise any of these rights they should contact the College HR Manager. Some of these rights are not automatic, and the College reserves the right to discuss with the applicant why it might not comply with a request.

### **8. What if an applicant does not provide personal information?**

Where provision of personal information is required for the College to enter into an employment contract with an applicant or is a statutory requirement (i.e. right to work), refusal to provide this information will prevent the College from being able to make an offer of employment.

**9. Who should be contacted if an applicant has queries about the College's use of their personal information?**

Any concerns or queries about the Company's use of their personal information detailed in this policy should be referred to the College, Director of HR or the COO & Bursar.