



## Privacy Notice

Data controller: The Howard Partnership Trust, HR Department, Lower Road Effingham, Surrey, KT24 5JR. Data protection officer: email [dpo@thpt.org.uk](mailto:dpo@thpt.org.uk)

As part of any recruitment process, The Howard Partnership Trust (THPT) collects and processes personal data relating to job applicants. THPT is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

### **What information does THPT collect?**

THPT collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- your date of birth, national insurance number and where applicable your DfE registration number or DBS registration number;
- details of your qualifications, skills, experience and employment history;
- information about your current level of remuneration, including benefit entitlements;
- whether or not you have a disability for which THPT needs to make reasonable adjustments during the recruitment process;
- equal opportunities monitoring information including information where provided about your gender, age range, ethnicity, ethnic origin, religion, marital status, sexual orientation, nationality and disability; and
- information about your entitlement to work in the UK.

THPT 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, including online tests.

THPT may also collect personal data about you from third parties, such as references supplied by former employers and information from criminal records checks.

In line with the Safer Recruitment Statutory Guidance, THPT will seek information from third parties for reference purposes before a job offer is made to you. However, the reference request made before a job offer will not ask questions about health or sickness absence. Once THPT has decided that you meet the requirements for the role and a conditional offer made to you, a further reference request will be sought including questions regarding sickness absence. THPT will not discriminate against a disabled job applicant on the basis of any information gained from such questions.

The Keeping Children Safe in Education guidance can be viewed by pasting the following web address into your browser;

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

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 THPT process personal data?**

THPT 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, THPT 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.

THPT may process special categories of data, such as information about age, gender, marital status, nationality, ethnicity, 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. THPT processes such information to carry out its obligations and exercise specific rights in relation to employment.

THPT 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 THPT to manage the recruitment process, assess and confirm a candidate's suitability for employment and decide to whom to offer a job. THPT may also need to process data from job applicants to respond to and defend against legal claims.

For all roles, THPT is obliged to seek information about criminal convictions and offences. Where THPT 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.

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

Your information is shared with the external provider of our Applicant Tracking System. THPT requires the provider to process your data in line with the General Data Protection Regulations and legislation 2018 and is responsible for ensuring your data is processed accordingly. This Applicant Tracking system is hosted by Iris Software Group Registered address Heathrow Approach, 470 London Road, Slough, SL3 8QY Company number 06295385.

Collection and maintenance of Registered Users contact details for the purposes of job applications, password reminders and email correspondence relating to site use. Iris Software Group uses the information provided by you for the purposes of transferring this information to THPT. Iris Software Group will carry out maintenance of the system and data on the instructions of THPT. Iris Software Group client data is held in the UK only.

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, managers in the business area with a vacancy and IT staff if access to the data is necessary for the performance of their roles.

THPT will share your data with former employers to obtain references in line with the Safer Recruitment Statutory Guidance prior to a job offer being made. THPT will not share your data with any other third parties e.g. to obtain necessary criminal records

checks, unless your application for employment is successful and it makes you an offer of employment.

When THPT appoints third parties to process data on our behalf, the third party is also required to process the data lawfully and fairly and in a manner that ensures appropriate security of the data, using appropriate technical or organisational measures to protect against unauthorised or unlawful processing and accidental loss. THPT will not transfer your data outside the European Economic Area.

### **How does THPT protect data?**

THPT takes the security of your data seriously. THPT has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties. Further information can be found in the HR Data Protection Protocol which can be obtained from the HR Department - [hr@thpt.org.uk](mailto:hr@thpt.org.uk)

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

### **For how long does THPT keep data?**

If your application for employment is unsuccessful, copies of identity documents such as passport copies and proof of identity/address are destroyed immediately. THPT will hold your data on our Applicant Tracking System and other paper data such as assessment results/notes for a period of one full academic year after the end of the relevant recruitment process. Following this your personally identifiable data will be deleted or securely 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 a new privacy notice.

### **Your rights**

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

- access your data on request. Our Applicant Tracking System allows you to view any draft or submitted application and withdraw any draft application forms and associated attachments from your applicant portal;
- require THPT to change incorrect or incomplete data. Our Applicant Tracking System provides you with the facility to correct your own personal details if it has been entered incorrectly, or for THPT to do this on your behalf.
- require THPT to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing. You can withdraw any draft applications and/or your profile from the applicant portal. Submitted applications will be retained in line with the THPT data retention schedules and then deleted or securely destroyed.

- object to the processing of your data where THPT is relying on its legitimate interests as the legal ground for processing.

If you would like further information about exercising any of these rights, please contact [recruitment@thpt.org.uk](mailto:recruitment@thpt.org.uk)

If you believe that THPT has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

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

### **Automated decision-making**

THPT's recruitment processes do not use any automated decision-making.