

# Privacy Notice – Applicants to Bradford Grammar School



## 1. Definitions

**Data controller** - A controller determines the purposes and means of processing personal data. For the purposes of this Privacy Notice, Bradford Grammar School is the data controller.

**Data processor** - A processor is responsible for processing personal data on behalf of a controller.

**Data subject** – Natural person (staff for the purposes of this Privacy Notice)

**Special categories of personal data** - The General Data Protection Regulation (“GDPR”) refers to sensitive personal data as ‘special categories of personal data’ (as explained in Article 9 of GDPR). The special categories specifically include genetic data, and biometric data where processed to uniquely identify an individual. Other examples include racial and ethnic origin, sexual orientation, health data, trade union membership, political opinions, religious or philosophical beliefs.

**Processing** - means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Third party** - means a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

## 2. Who are we?

Bradford Grammar School is an outstanding UK independent grammar school, which believes in providing every opportunity for its Junior and Senior pupils. We embrace academic, sporting and creative excellence within an aspirational, caring environment, which builds on our heritage while looking to the future. We nurture exciting and fulfilling lives shaped by our School’s traditional values and believe happiness is the key to an individual’s success. We are at ease with excellence.

Our Charity registration number is 529113, and we are registered at Bradford Grammar School, Keighley Road, Bradford, BD9 4JP.

Your privacy and confidentiality are of paramount importance to us. We are committed to protecting and respecting your privacy. This statement explains when and why we collect personal information, how we use it, the conditions under which we may process it and how we keep it secure.

This notice applies to individuals applying for a position at Bradford Grammar School whether as an employee or under any other contractual or voluntary arrangement, including prospective consultants, coaches, casual workers, supply staff, visiting music teachers, agency workers, extra-curricular providers, volunteers and individuals on work experience (“Applicants”).

The school takes the security of your data seriously. Internal policies and controls have been put 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.

Where the school 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.

## 3. What is Personal Data?

Personal data is information which relates to a living individual and from which he or she can be identified either directly or indirectly through other data which the data controller has or is likely to have in its possession. These individuals are sometimes referred to as data subjects. Personal data does not include information about companies and organisations.

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## 4. What do we hold?

This information is normally initially provided to the school by you through an application form, which you submit either electronically or in hard copy.

To carry out our activities and obligations as a prospective employer, we may collect, store, and process the following categories of personal data about you:

- personal contact details - name, title, addresses, telephone numbers, personal email addresses;
- date of birth;
- equal opportunities monitoring information;
- copies of identification
- government identification numbers such national insurance number, driver's licence number or other identification card / passport number;
- bank account details and payroll information;
- qualifications, education and training records;
- employment records (including professional memberships, references, work history, and proof of work eligibility); and
- other personal details collected during the recruitment process, or other information that you otherwise voluntarily provide to us.
- Track and trace information

## 5. Collecting, handling, processing and sharing personal data?

Your personal data is collected and processed based on legal obligations and the legitimate interest of both parties. We may collect and process special categories of personal data based on legal obligations and the legitimate interests of both parties where it is necessary for the recruitment process. Such special categories of personal data may include:

- i. Information about employee's racial and ethnic origin; sexual orientation; religion, beliefs and disability information to ensure meaningful equal opportunity monitoring and reporting;
- ii. physical or mental health condition or disability information to provide appropriate adjustments where required during the recruitment stages, and to assess an applicant's suitability for the role;
- iii. information about past criminal convictions, cautions and also information regarding anyone living in the household who has ever been barred from working with children, as a condition of employment for all posts;

The processing of your personal data by Bradford Grammar School could be based on the fulfilment of a legal obligation, legitimate interest, or consent. This may include:

- Managing Human Resources processes such as recruitment and selection.
- Communicating with you regarding the vacancy and recruitment process.
- Monitoring equal opportunities and statistical analysis.
- Where applicable, communicating with you if other similar/suitable vacancies arise.
- Seeking references from current/former employers.
- Responding to and defending any legal claims that may arise from the recruitment process
- For track and trace purposes.

Bradford Grammar School additionally processes special category data of applicants such as:

- Equal opportunities monitoring.
- Managing obligations under Equal Opportunities legislation, including providing a fair and equal recruitment process and making reasonable adjustments throughout the recruitment stages
- Track and trace information

Please note our website may use web-tracking tools to analyse the overall traffic patterns of visitors to this site. We do not correlate information regarding individual users - this information is correlated aggregately and

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includes breakdowns of such information as user's domain name, total visits, browser type, time of day summaries etc. This information enables us to tailor the site to give our visitors a better browsing experience.

Within the school, personal data may be shared between colleagues who legitimately need the information to carry out appropriate recruitment processes. Bradford Grammar School is required to obtain information about past criminal convictions, cautions and also information regarding anyone living in the household who has ever been barred from working with children, as a condition of employment for all posts. The school also undertakes DBS checks on all staff. The amount of personal information shared within Bradford Grammar School will be no more than is reasonably necessary.

## **6. How do we collect and store information from you?**

Whilst the majority of the information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the GDPR, we will inform you whether you are required to provide certain workforce data to us or if you have a choice in this.

If you are shortlisted, and prior to interview the HR team will undertake an online search as part of the due diligence to check your suitability for working with children. The aim is to help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with you at interview. On our website Bradford Grammar School may use web-tracking tools to analyse the overall traffic patterns of visitors to this site. We do not correlate information regarding individual users - this information is correlated aggregately and includes breakdowns of such information as user's domain name, total visits, browser type, time of day summaries etc. This information enables us to tailor the site to give our visitors a better browsing experience. We will store the workforce data in accordance with our Data Protection and Data Retention policies.

## **7. Who do we share the information about you with?**

The school shares your data with third parties in order to obtain pre-employment references from other employers, employment background checks from third-party providers, necessary criminal records checks from the Disclosure and Barring Service (DBS), Teaching Regulation Agency.

## **8. How long will we keep your data for?**

. We will keep recruitment information (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. This is likely to be for 12 months from the communication of the outcome of the recruitment exercise which takes account of both the time limit to bring claims and for claims to be received by the School. 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, and the longer period for which they will be kept.

## **9. Your Rights**

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 our Data Protection Manager who is Mrs Homera Najib, Acting Bursar and Clerk to the Governors via [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com) or by post to the address list in point 1. If any of the information we hold is incomplete or inaccurate, please tell us by contacting us at [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com) and we will correct it.

We will endeavour to provide you with requested information within one month. We can impose a charge for this information if the request is manifestly unfounded or excessive. If we do refuse a request, we will advise you accordingly within one month. If this eventuality did arise you have the right to complain in accordance with our complaints procedure. In addition, without prejudice you have the right to lodge a complaint direct to the Information Commissioner's Office if you have any concerns in relation to our information rights practices.

You also have the right to:

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- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed;
- claim compensation for damages caused by a breach of data protection legislation

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/> ICO Helpline – 0303 123 1113.

## 11. Withdrawing Consent

Where you have provided your consent to the collection, processing and transfer of your personal data, you may withdraw that consent at any time. This will not affect the lawfulness of data processing based on consent before it is withdrawn. To withdraw your consent please contact [HR@bradfordgrammar.com](mailto:HR@bradfordgrammar.com).

## 12. What if you do not wish to share your personal data?

In order to process applications, you are required to provide the school with your personal data. Certain information, such as contact details, your right to work in the UK and statutory employment checks, have to be provided to enable the school to effectively administer your application. If you do not provide this information, the school will not be able to administer your rights and fulfil obligations arising from the recruitment process.

## 13. Changes to our Privacy Policy

We may change this Policy from time to time. Any changes made to the policy will be clearly detailed within this section. This Policy was last updated in August 2020 to be GDPR compliant.

## 14. Website Third Party Links

Our website may contain links to other websites run by other organisations. This Privacy Policy applies only to our website, so we encourage you to read the privacy statements on any other websites you visit. We cannot be responsible for the privacy policies and practices of other sites even if you access them using links from our website. We do not endorse the content of any external sites and we are not responsible or liable, directly or indirectly, for any loss however caused to you by your use of any external site.

## 15. Miscellaneous

The information on this website is for residents of the UK only. These terms shall be governed by and construed in accordance with English law and the English courts shall have jurisdiction over any disputes between us.

## 16. Contact Us

Any questions regarding this Policy and our privacy practices should be sent via [dataprotection@bradfordgrammar.com](mailto:dataprotection@bradfordgrammar.com).

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