



RECRUITMENT AND TALENT POOL PRIVACY POLICY

Avanti Schools Trust

This policy is in force until further notice from:	Oct 2022
This policy must be reviewed by:	Oct 2023
Policy Author(s):	Hollie Jones
Date policy reviewed by Head of HR:	Oct 2022
Date policy reviewed by Compliance & Governance Officer:	Oct 2022
Date compliance with GDPR assured:	Oct 2022
Location of publication of policy:	AST Careers Page & HR Shared Point
Under the Trust's Scheme of Delegation this policy must be approved by [People & Compliance Committee]. Such approval was given on:	People, Compliance & Governance Committee on behalf of the Board Oct 2022

What is the purpose of this document?

Avanti Schools Trust is a “data controller”. This means that we are responsible for deciding how we hold and use personal information about you. You are advised to read this privacy notice if you are applying for work with us (whether as an employee, worker or contractor) and/or if you are joining our talent pool via our recruitment site. It makes you aware of how and why your personal data will be used, namely for the purposes of the recruitment exercise, and how long it will usually be retained for. It provides you with certain information that must be provided under the UK GDPR, the retained EU version of the General Data Protection Regulation ((EU) 2016/679) (GDPR).

This document should be read in conjunction with our Recruitment & Selection Policy and Procedure, which can be found on our website.

Data protection principles

We will comply with data protection law and principles, which 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 any 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 securely.

The kind of information we hold about you

In connection with your application for work with us and/or your inclusion in our talent pool, we will collect, store, and use the following categories of personal information about you:

- The information you have provided in your application including name, title, address, telephone number, personal email address, date of birth, gender, employment history, qualifications;
- Any information you provide to us during an interview.

We may also collect, store and use the following types of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs and sexual orientation.
- Information about your health, including any medical condition, health and sickness records.
- Information about criminal convictions and offences.

How is your personal information collected?

We collect personal information about candidates from the following sources:

- You, the candidate.
- Recruitment agencies
- Your named referees

How we will use information about you

We will use the personal information we collect about you to:

- Assess your skills, qualifications, and suitability for the role.
- Carry out background and reference checks, where applicable.
- Communicate with you about the recruitment process.
- Keep records related to our hiring processes.
- Comply with legal or regulatory requirements.

We have a legal obligation to process personal information in order to meet safer recruitment requirements.

We also need to process your personal information to decide whether to enter into a contract with you.

If you fail to provide personal information

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

How we use particularly sensitive personal information

We will use your particularly sensitive personal information in the following ways:

- We will use information about your disability status to consider whether we need to provide appropriate adjustments during the recruitment process.
- We will use information about your race or national or ethnic origin, religious, philosophical or moral beliefs, or your sexual life or sexual orientation, to ensure meaningful equal opportunity monitoring and reporting.

Information about criminal convictions

We will collect information about criminal convictions as part of the recruitment process if it is appropriate given the nature of the role and where we are legally able to do so. Given our status as an education provider, most positions will require an enhanced DBS and other vetting procedures which require the processing of criminal conviction data.

Automated decision-making

You will not be subject to decisions that will have a significant impact on you based solely on automated decision-making.

Data sharing

Why might you share my personal information with third parties?

We will only share your personal information with a third party if it is necessary for the purpose of the recruitment process. They are required to take appropriate security measures to protect your personal information in line with our policies. We do not allow our third-party service providers to use your personal data for their own purposes. We only permit them to process your personal data for specified purposes and in accordance with our instructions.

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. 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. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We do not transfer personal data outside of the European Union or European Economic Area unless we have security measures and approved contracts in place to protect your personal data.

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

Data retention

How long will you use my information for?

We will usually retain your personal information in our talent pool until we are satisfied that we will not consider recruiting you at any point in the foreseeable future, or until you request us to remove your personal information from the talent pool, whichever is sooner.

If you have applied for a role, we will usually retain a copy of your application for a period of 6 months following the completion of that recruitment campaign. We retain your personal information for that period so that we can show, in the event of a legal claim, that we have not discriminated against candidates on prohibited grounds and that we have conducted the recruitment exercise in a fair and transparent way. After this period, we will securely destroy your personal information in accordance with our data retention policy.

Rights of access, correction, erasure, and restriction

Your rights in connection with personal information

Under certain circumstances, by law you have the right to:

- Request access to your personal information (commonly known as a “data subject access request”). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
- Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes.
- Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.
- Request the transfer of your personal information to another party.

If you want to review, verify, correct or request erasure of your personal information, object to the processing of your personal data, or request that we transfer a copy of your personal information to another party, please contact us at dpo@avanti.org.uk.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO whose details are given below. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.

DPO: HY Education

Tel: 0161 543 8884

Email: dpo@wearehy.com