Hamwic Education Trust & Southampton Hospital School

Recruitment Privacy Notice

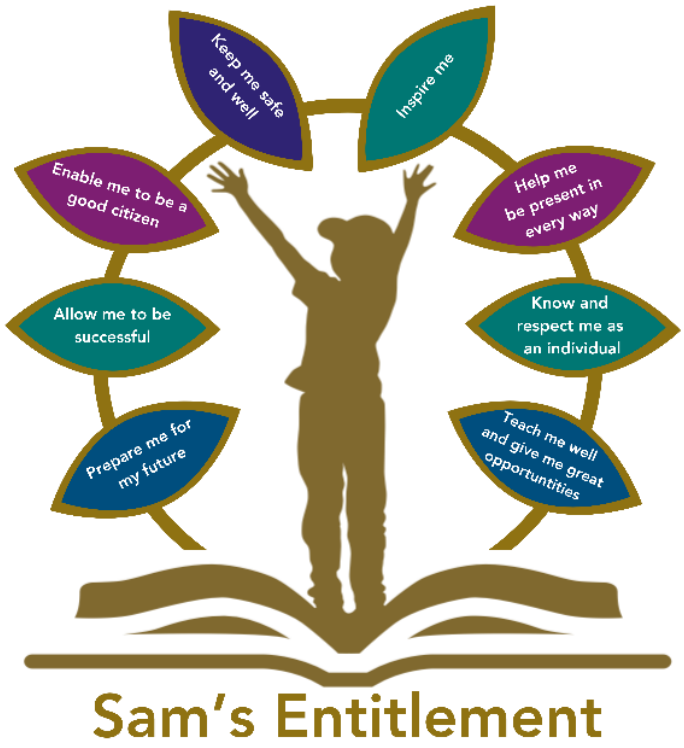
Reviewed on	September 26	Review frequency	Annual
Next review due	September 27	Template Yes / No	Yes
Owner	Head of Safeguarding & Compliance	Approved by	DCEO

1. History of Policy Changes

Date	Page	Change	Origin of Change
Sept 26	7	Added clarification that recruitment information may be retained where an application is withdrawn or unsuccessful.	ICO employment records guidance
	7	Added International Transfers of Personal Data section Added Transfer Risk Assessment wording and updated international transfer safeguards	Data (Use and Access) Act 2025 and UK GDPR overseas transfer requirements
	8	Added standalone Complaints section	UK GDPR and Data Protection Act 2018 right to complain to the ICO
	9	Added reference to HET Data Protection Policy and Records Management & Retention Policy	UK GDPR; improved transparency and accessibility.

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3. Aims

Hamwic Education Trust (HET) believe that all pupils should receive a high quality, enriching, learning experience in a safe and inclusive environment, which promotes excellence through a broad curriculum that prepares them for their future and opens doors to a diverse array of opportunities as well as that all pupils and adults within HET flourish as individuals and together.

4. About this privacy notice

Hamwic Education Trust (HET) is required by law to collect and process personal information about individuals who apply to work for us. We are committed to being transparent about how we collect and use this information and to meet our data protection obligations.

This privacy notice provides you with information about how we collect and process personal information of our individuals during the recruitment process in accordance with the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018.

This notice applies to individuals who apply for a job vacancy with us. This notice does not form part of any contract of employment or other contract to provide services. We may update this notice at any time but if we do so, we will provide you with an updated copy of this notice as soon as reasonably practical.

5. Who are we?

We are Southampton Hospital School (SHS) and are part of the Hamwic Education Trust (HET), this a multi-academy trust incorporating a number of different schools. Our registered office is Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ and our company number is 10749662.

This privacy notice has been issued on behalf of HET. When we refer to "we", "us", "our" or "the Trust" within this privacy notice, we are referring to SHS which is part of HET. HET is the 'data controller' for the purposes of data protection law and is registered with the Information Commissioner's Office.

HET has appointed a Data Protection Officer who is responsible for overseeing questions in relation to this privacy notice. If you have any questions about this privacy notice, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

6. What data do we collect?

We collect and process a wide range of information during the recruitment process. This includes:

Up to and including shortlisting stage

- Personal information such as names, any former names, address, email address, phone numbers).
- National insurance number.
- Details of your qualifications, training, experience, employment history and any other information you provide in your initial application (including job titles, salary, relevant dates and working hours, details of driving licence (if relevant for role), membership of professional bodies and interests and statement of personal qualities).
- Details of your referees.
- Details of any relationships with our workforce.

Following shortlisting stage

- Information 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.
- A copy of your ID documents.
- A copy of your professional qualifications.
- Information about any checks we are legally required to undertake (for example your teacher status or whether you are subject to a prohibition from teaching order, disqualified from providing childcare or any relevant overseas information).
- Confirmation of whether or not you are known to the police or social services.
- Information discovered following online searches being conducted.
- Details of any other information that is provided to us during the course of the recruitment process.

7. What sensitive data do we collect?

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

- Information about your race or ethnicity, religious beliefs, sexual orientation, and political opinions.
- Trade union membership details.
- Information about your health, including any medical conditions and sickness records, details of any medical checks conducted.
- Information about criminal convictions and offences.

8. How do we collect this information?

The Trust/School may collect this information in a variety of ways. For example, information might be collected through application forms, obtained from your passport or other ID documents, forms completed by you during the recruitment process, from correspondence with you, through interviews, meetings or assessments.

The Trust/School may also collect information about you from third parties, such as from references from your former employers, information from employment background check providers such as the Disclosure and Barring Service (DBS), information from publicly available social media accounts, information from credit reference agencies and information from criminal records checks permitted by law.

9. Why do we collect and use this information?

We have set out below a description of all the ways we plan to use recruitment information, and which of the legal bases we rely on to do so. We may process recruitment information for more than one lawful basis depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To assess your suitability for the role you are applying for	All the information listed above in 'What data do we collect'.	Necessary to comply with our legal obligations Performance of a contract
To make a decision about your recruitment or appointment	All the information listed above in 'What data do we collect'.	Necessary to comply with our legal obligations Performance of a contract
To determine the terms on which you work for us	All the information listed above in 'What data do we collect'.	Performance of a contract
To ensure you are legally entitled to work in the UK	Contact details and personal details Recruitment information ID documents	Necessary to comply with our legal obligations

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To ensure you are not prohibited from teaching or providing childcare	All the information listed above in 'What data do we collect'.	Necessary to comply with our legal obligations
To conduct data analytics studies to review and better understand our recruitment needs	Contact details and personal details Recruitment information	Necessary for our legitimate interests to better understand our workforce

10. Why do we collect and process sensitive information?

We have set out below a description of all the ways we plan to use more sensitive "special category data" during the course of the recruitment process, and which of the legal bases we rely on to do so.

We may process recruitment information for more than one lawful ground depending on the specific purpose for which we are using your information.

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
To ascertain your fitness to work	Contact details and personal details Health and medical information	Necessary to comply with our legal obligations Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To make reasonable adjustments	Contact details and personal details Health and medical information	Necessary to comply with our legal obligations Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ensure your suitability for work	Contact details and personal details Health and medical information Criminal offence and conviction data Nationality and immigration status	Necessary to comply with our legal obligations Schedule 1, Part 1, (1) Data Protection Act 2018 – Employment Purposes
To ensure meaningful equal opportunities monitoring and reporting	Information about your race or national or ethnic origin, religious, philosophical or moral	Necessary for the performance of a task in the public interest

Purpose/Activity	Type of Information	Lawful Basis for Processing Information
	beliefs, or your sexual life or sexual orientation	Schedule 1, Part 2, (8), Data Protection Act 2018 – Equality of opportunity or treatment

11. Storing personal information

We keep recruitment information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting or reporting requirements. Recruitment information will also be held if your application is withdrawn or if you are unsuccessful in your application.

Details of retention periods for different aspects of personal information are set out in our HET Records Management and Retention Policy and is available upon request. After this period, we will securely destroy or anonymise personal information in accordance with data protection law.

12. Who do we share information with?

We may share recruitment information with:

- Our professional advisors such as legal and HR advisors
- Recruitment agencies we engage
- Medical check providers
- Your nominated referees
- Third party reference providers, such as DBS, National College of Teaching and Leadership Teachers Services
- Other schools within HET
- Other third parties we may engage the services of for the purposes of providing a public task or the administration of the Trust/School, for example our safeguarding monitoring software, our management information system provider
- Other third parties to whom we may choose to transfer or merge parts of the Trust/School or our assets. Alternatively, we may seek to acquire other trusts, schools or academies or merge with them. If a change happens to the Trust/School, then the new management team may use your personal information in the same way as set out in the privacy notice.

This list is not exhaustive as there are other circumstances where we may also be required to share information, for example:

- To comply with our legal obligations.
- In connection with legal proceedings (or where we are instructed to do so by Court order).

13. International Transfers of Personal Data

Your personal information may be transferred outside the UK and the European Economic Area (‘**EEA’**), including to the United States. Where information is transferred outside the UK or EEA to a country that is not designated as “adequate” in relation to data protection law, the information is adequately protected by conducting a transfer risk assessment to ensure that security measures and

other appropriate safeguards are in place to protect your information. For more information on international transfers please contact us at the details below.

14. Your rights

Data protection law gives you certain rights about how your information is collected and used. To make a request for your personal information, please contact the school Data Compliance Officer (DCO) - see their contact details in section 17.

Under data protection law, you also have the following rights:

- the right to be informed about the collection and use of your personal information – this is called 'right to be informed'.
- the right to ask us for copies of your personal information we have about you – this is called 'right of access', this is also known as a subject access request (SAR), data subject access request or right of access request.
- the right to ask us to change any information you think is not accurate or complete – this is called 'right to rectification'.
- the right to ask us to delete your personal information – this is called 'right to erasure'
- the right to ask us to stop using your information – this is called 'right to restriction of processing'.
- the 'right to object to processing' of your information, in certain circumstances.
- rights in relation to automated decision making and profiling.
- the right to withdraw consent at any time (where relevant).
- the right to complain to the Information Commission if you feel we have not used your information in the right way.

There are legitimate reasons why we may refuse your information rights request, which depends on why we are processing it. For example, some rights will not apply:

- right to erasure does not apply when the lawful basis for processing is legal obligation or public task.
- right to portability does not apply when the lawful basis for processing is legal obligation, vital interests, public task or legitimate interests.
- right to object does not apply when the lawful basis for processing is contract, legal obligation or vital interests. And if the lawful basis is consent, you don't have the right to object, but you have the right to withdraw consent.

15. Withdrawal of consent

Where we are processing your personal information with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal information, please let us know by contacting our Data Protection Officer by emailing compliance@hamwic.org.

Where we are processing your personal information with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal information, please let us know by contacting our Data Protection Officer by emailing compliance@hamwic.org.

16. Complaints

If you have a concern about the way we are collecting or using your personal information, you have the right to make a complaint to us.

Any complaints relating to data protection must be directed to the HET Data Protection Officer (DPO), Gemma Carr, Deputy CEO. See contact details below, section 17.

Data protection complaints will be dealt with in accordance with the procedure set out in our Data Protection Policy.

If you remain dissatisfied with our response, you can make a complaint directly to the Information Commission at - Make a complaint about how an organisation has used your personal information | ICO.

17. Contact

We have a person called the Data Compliance Officer (DCO) at the school. They can answer any questions about this privacy notice or what the school does with your information.

If you want to speak to them, then you can do at:
Toni Graves
119 Tremona Road
SO166HU
Telephone: 02381206667
Email: info@southamptonhospitalschool.co.uk

You can also contact the Trust's Data Protection Officer (DPO), Gemma Carr, Deputy CEO.

Email: compliance@hamwic.org

Telephone: 023 8078 6833.

Address: Hamwic Education Trust, Unit E, The Mill Yard, Nursling Street, Southampton, Hampshire SO16 0AJ.

18. Link to HET policies

- HET Data Protection Policy
- HET Records Management and Retention Policy