

Privacy Notice – Recruitment Candidates - How we use your personal data

Who is this document for?

All recruitment candidates applying for voluntary and permanent positions at Bradford College or within the Bradford College Group.

Your information rights

Under the General Data Protection Regulations, you have various rights in relation to your personal information:-

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Please note, exemptions may apply when making a request to exercise your rights, for example where we have to retain or process information for legal purposes. For more information visit www.ico.org.uk/your-data-matters/.

The categories of information that we may collect, process, hold and share include:

- **Contact details** such as first name, middle names, surname, address, personal and work email addresses, personal and work telephone numbers
- **Financial details** e.g. bank details, salary details, tax/national insurance details, pension details
- **Lifestyle information** such as dietary preferences, hobbies, other likes/dislikes/preferences etc.
- **Location** e.g. physical or electronic information which identifies your location
- **Online/Unique identifiers** such as ID codes, online/website details e.g. usernames, passwords, session IDs, geo locations, device/pps ID, IP addresses, cookies, RFI tags.
- **Special Categories of Data** which may include information about racial and ethnic origin, religion, politics, trade union membership, genetic and biometric data (e.g. fingerprints used for ID purposes), health, mental health, physiological and disability information, sexual orientation, behavioural characteristics, social identity, cultural background, facial Images, philosophical beliefs and economic data
- **Personal non-contact details** e.g. date of birth, age, gender, photographs, video imaging, passport details, visa details, driving licence details
- **Academic and staff development information** subjects taught, exam results/qualifications/academic achievement/mandatory and voluntary professional body memberships/accreditations/certifications /training records
- **Complaints/Grievances details** (e.g. Student, staff, public and other complaints to which you are a named party or involved in the investigation process)
- **Health and Safety information** such as accident records, risk assessments, occupational health records and other information such as insurance and legal records which may arise as a result of the recruitment process

- **Criminal and Conviction Information** e.g. Disclosure Barring Service checks (DBS) and disclosures provided to us (see below) and other notifications e.g. 'Overseas Criminal Record Checks', 'List 99' and National College for 'Teaching and Leadership (NCTL)

We may collect, process and share your personal information to:

- Comply with our various legal and contractual obligations and conduct our business activities e.g.:
 - Administration and management of our contractual relationship (pre-contract) and/or voluntary agreements;
 - To facilitate the administration and management of our relationship with Recruitment and Employment Agencies where used in the recruitment process;
 - Enable us to make payments in relation to expenses (if applicable) etc.
 - To enable us to provide mandatory training and voluntary training where necessary
 - Performing due diligence checks for voluntary workers and governors
 - Performing pre-employment checks which include references, professional qualification/academic checks, Qualified Teacher Status, DBS, visas, Overseas Criminal Record checks, NCTL checks (for academics), List 99 checks, Right to Work in the UK, Business Driver checks, Risk Assessments.
 - Providing access to Bradford College and Bradford College Group Systems where applicable e.g. Select/Medigold (pre-employment checks)
 - Providing a safe and secure environment through provision of Health and Safety, Occupational Health and Safeguarding services
 - Provide reasonable adjustments if required for the application and interview process
 - Contact details for next of kin, emergency contacts in the event of an emergency
 - To take photographs for the purpose of providing an ID card where applicable
 - To record entry and exit to our buildings/campuses e.g. visitor/contractor signing in books
 - To use CCTV recording and photographic images for safety and security purposes
 - To assist in the detection, investigation and prevention of crime
 - Complying with our obligations under the GDPR, for example at times we may need to share personal information about staff, students or others for whom we hold personal data for Data Subject Access Requests, such information may be contained within emails, documents, systems, paper and electronic records/filing systems and other forms of media. This may include disclosure of information of which you were the author or have contributed to. This includes deleted and archived personal information which is still accessible.
 - Complete and return Government and other funding body or awarding/validating body Data Collection Returns for statistical and research purposes to include;
 - monitoring Equality and Diversity
 - informing the development of recruitment and retention policies
 - collating data collection/statistical returns to the government, funding bodies, validating/awarding bodies and partnership agreements.

Collecting this information

Whilst the majority of information you provide to us is mandatory or necessary to enable us to provide services to you or conduct our business activities, some of it is provided to us on a voluntary basis. In order to comply with data protection legislation, we will inform you whether you are required to provide information to us or if you have a choice in this.

We collect personal data in a variety of different ways for example paper and online forms, by email and verbally.

Some information may be provided to us by Recruitment Agencies where they are used to source candidates on our behalf. We will ask you to complete an application form and use this to update any personal information given to us by them.

The lawful basis on which we process this information

The majority of the processing we carry out in relation to Bradford College and Bradford College Group is necessary to comply with various legal and contractual requirements such as:-

Employment

- HMRC Income Tax and National Insurance Requirements (www.gov.uk)
- Public Liability Insurance

Health and Safety

- Health and Safety at Work etc. Act 1974 (and associated regulations and codes of practice)
- Equality Act 2010

Statutory Funding requirements

- Conditions of Funding Agreement Education and Skills Funding Agency

Safeguarding/Education

- Prevent Duty
- Section 175 of the Education Act 2002
- Further and Higher Education Act 1992
- 'Keeping children safe in education Statutory guidance for schools and colleges' Guidance (www.gov.uk) and adult safeguarding guidance

Where we ask you for information for which we do not have a contractual or legal basis for processing, we will either tell you the legitimate basis for processing or obtain your consent.

Use of Social Media

We may occasionally use social media e.g. Twitter/LinkedIn/Facebook to promote details of Bradford College and Bradford College Group vacancies and opportunities. Please be aware that if you comment on any posts that these can be shared publicly and we may have no control over your personal data.

Storing this information

Most personal data collected for recruitment purposes will be deleted after 6 months, however, we are required to retain some information in accordance with statutory retention guidelines, for example, Health and Safety records in relation to accident data, reasonable adjustments implemented for interview purposes and financial records where we have made expenses payments. We will only retain what is necessary in accordance with prescribed retention guidelines set out in our Information Records Management Policy Retention Schedule.

Third Party Processors and Transferring data internationally

Where we use Third Party Processors or transfer personal data to a country or territory outside the European Economic Area, we will do so in accordance with data protection law.

Disclosure and Barring Service (DBS) Checks

We will require a Disclosure and Barring Service (DBS) or similar check for non-UK staff to be carried out, this check helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. As part of the DBS check application process, as required by the DBS, we will provide you with a separate Standard/Enhanced Check Privacy Policy for Applicants and ask you to confirm you understand how the DBS will process your personal data and the options available to you when submitting an application. Further information is available at www.gov.uk/dbs.

Who we share your personal information with

To enable us to comply with our legal and contractual obligations, we may at times need to share some of your personal information (and in some instances special categories of data) as follows:

- Disclosure and Barring Service (DBS) – to obtain a DBS check to check for criminal convictions and offences and other Government agencies for pre-employment checks
- Police and Enforcement Agencies – to assist in the detection, investigation and prevention of crime this includes the Courts and Coroner Service
- Health and Safety Executive to report Reportable Injuries
- Emergency services in the event of an emergency
- Recruitment and Employment Agencies where used for recruitment purposes
- Business system and service providers e.g. Select Recruitment System/Your Business Voice/Medigold/iTrent
- Previous employer and personal referees
- Data collection returns and surveys for equality and diversity purposes to government/EFSA and other bodies e.g. Association for Colleges
- In connection with DSAR requests (Data Subject or Authorised Representative) e.g. information which may be contained within emails, documents, systems, paper and electronic records/filing systems and other forms of media, this may include work email address(es), work contact details and also the disclosure of information of which you were the author or to which you have contributed. This includes deleted and archived personal information which is still accessible.
- Information Commissioner's Office (ICO) (complaints/breaches investigations)

Further information

Please visit Bradford College and Bradford College Data Protection and GDPR Website for further information, for example how to make a Data Subject Access Request.

Exercising your rights and concerns

If you would like to exercise your data rights please contact the Data Protection Officer.

If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance by contacting the Bradford College and Bradford College Group in writing:

Data Protection Officer, Bradford College, F Floor, Old Building, Great Horton Road, Bradford BD7 1AY

or email: dataprotection@bradfordcollege.ac.uk

Alternatively, you can make a complaint to the Information Commissioner's Office:

Call 0303 123 1113, report a concern online at www.ico.org.uk/concerns or,

write to Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF