

PATE'S GRAMMAR SCHOOL FOUNDATION & THE RICHARD PATE SCHOOL ("THE SCHOOL")



Recruitment, Selection and Disclosures Policy and Procedure, including Policy on the Recruitment of Ex-Offenders (Appendix 1) and Recruitment Privacy Notice (Appendix 2)

May 2026

1. General

Safeguarding

The School is committed to ensuring the best possible environment for the children and young people in its care, and aims to recruit staff that share and understand this commitment.

Safeguarding and promoting the welfare of children and young people is the school's highest priority. For all new appointments, the school will follow a robust recruitment process with the aim of deterring and preventing people who are unsuitable to work with children from applying or securing employment.

Staff involved in the recruitment and employment of staff (as well as Trustees with oversight of the recruitment process) will receive appropriate safer recruitment training, and at least one of the persons who conducts an interview will have completed safer recruitment training.

An entry will be made on the Single Central Register for all current members of staff at the School, the proprietorial body and all individuals who work in regular contact with children including volunteers, supply staff and those employed as third parties.

All checks will be made in advance of appointment, or as soon as practicable after appointment.

Equal Opportunity

Pate's Grammar School Foundation is an equal opportunities employer, and is committed to ensuring that no job applicant is treated unfairly by reason of a protected characteristic as defined within the Equality Act 2010. Job Adverts and Application Forms will invite applicants to let the school know of any reasonable adjustments they may require at any stage of the recruitment process.

Proprietors

The School is owned and operated by the Trustees of the Pate's Grammar School Foundation, and day to day management is delegated to a sub-committee of Trustees: the Richard Pate School Committee. All queries on the School's recruitment process should be directed to the Bursar.

2. Scope of this Policy

The Recruitment, Selection and Disclosures Policy and Procedure herewith refers and applies to staff directly recruited and employed by the School. In the Education (Independent Schools Standards) (England) Regulations 2014, staff are defined as:

Any person working at the School whether under a contract of employment, under a contract for services or otherwise than under a contract, but does not include supply staff or a volunteer.

In the case of agency or contract workers, the School will set out their safeguarding requirements in the contract between the organisation and the School, and will obtain written confirmation from the agency or company that it has carried out the same checks as the School would otherwise perform on any individual working at the School (or who will be providing education on the School's behalf, including through online delivery). The School conducts identity checks on agency and contract workers on arrival in School and, in the case of agency workers which includes supply staff, the School must be provided with a copy of the appropriate level of DBS check for such staff.

The School will check with the relevant supply agency that the required checks have been carried out (identity, enhanced disclosure – renewed every 3 years, right to work in the UK, barred list, prohibition, qualifications, overseas checks plus, those checks set out in KCSIE as 'pre-employment' checks). The Single Central Register shows these checks have been made and the School carries out its own identity check and has seen a copy of the disclosure (whether or not it discloses any information).

Certain individuals are automatically disqualified from acting in senior management positions within a charity. Whether an individual falls into the category of a senior management position is judged using the following criteria:

- A person who is accountable only to the Trustees and who carries overall responsibility for the day-to-day management and control of the Charity. At The Richard Pate School this is the Headmaster and the Bursar.
- A person who is accountable only to the Head or the Trustees and who is responsible for the overall management and control of the Charity's finances. At the Richard Pate School this is the Bursar and the Finance Officer.

Being disqualified means that a person can't take on, or stay in, a senior manager position – even on an interim basis, unless the Charity Commission has removed (or "waived") the disqualification.

In respect of contractors, unchecked contractors will under no circumstances be allowed to work unsupervised in School. The School will determine the appropriate level of supervision depending on the circumstances.

Any staff who TUPE transfer into the School's staff, will be required to undertake the statutory requirements with regard to safer recruitment checks.

If staff are transferred under TUPE (gap of three months or less and information complete) information will be passed to the new employer and a note made on the Single Central Register that details have been accepted under TUPE.

3. Advert

The Advert will summarise the content of the role's Job Information Pack - which incorporates the Job Description and Person Specification. The Job Information Pack will be made available to all applicants.

It will make clear the safeguarding responsibilities of the post, and whether the post is exempt from the Rehabilitation of Offenders Act (ROA) 1974. The advert will include a statement of the school's commitment to safeguarding and promoting the welfare of children, and make clear that safeguarding checks will be undertaken. These include seeking references and conducting online and DBS checks.

4. Application Form

The School will only accept applications from candidates completing the relevant Application Form in full. CVs will not be accepted in substitution for completed Application Forms, but are permitted to be submitted alongside an application form.

The Application Form shall require applicants to provide:

- Personal details, current and former names, current address (and previous addresses within the past 5 year) and national insurance number.
- Details of their present (or last) employment and reason for leaving.
- Full employment history (since leaving school, including education, employment and voluntary work) including any reasons for gaps in employment.
- Qualifications, the awarding body and date of award.
- Details of referees/references.
- A statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.

The Application Form will make candidates aware that all posts in the School involve some degree of responsibility for safeguarding children, although the extent of that responsibility will vary according to the nature of the post. It will also make clear that it is an offence to apply for the role if barred from engaging in regulated activity relevant to children, and will provide details of where the school's Safeguarding Policy and Recruitment Policy can be read (on the school's website).

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal by the School if they have been appointed, and a possible referral to the police and/or DBS.

The Application Form will require applicants to sign a declaration to confirm that the information they have provided is true. Where there is an electronic signature, short-listed candidates will be asked to physically sign a hard copy of the application at the interview.

5. Shortlisting Candidates

At least two people (the interviewers) will carry out the shortlisting exercise, and will shortlist applicants according to the relevance and applicability of their professional attributes and personal qualities to the role, with reference to the Job Description and Person Specification. As part of their due diligence, the short-listers will also look for any inconsistencies, gaps in employment and reasons given, and explore any potential concerns in the interview.

Online Searches

A member of staff not involved in the decision-making process will also conduct an online search on shortlisted candidates to identify any incidents or issues that have happened, related to their suitability to work with children, and which are publicly available on line, which the interviewers might want to explore with the candidate at interview.

The online search will be of publicly available information via a general search engine: Google Chrome. Internet search criteria will be: applicants current name and previous name(s), in association with their towns of residence over the past 5 years, and their current employer. Details of the search will be recorded on the applicant's Interview Checklist. Completion of a search will also be noted on the School's Single Central Record.

6. References

The School, where possible, will obtain two references prior to interview, for both external and internal candidates. This allows any concerns raised to be explored further with the referee and can be taken up with the shortlisted candidate at interview. One reference will be from the candidates current (or most recent) employer, and both will be from within the previous six years where possible. A reference will also be sought from the last time the applicant worked with children, (if not currently working with children). If the candidate does not wish the School to take up references in advance of the interview, they should notify the School at the time of applying.

Referees, who should be a senior person with appropriate authority, will be asked to confirm they are satisfied with the applicant's suitability to work with children and provide the facts of any substantiated safeguarding concerns/allegations that meet the harm threshold set out in Part 4 of the statutory guidance 'Keeping Children Safe in Education'. Substantiated allegations that meet the harm threshold should be included in references. Any repeated concerns or allegation which do not meet the harm threshold which have all been found to be false, unfounded, unsubstantiated, or malicious should not be included in any reference.

If the candidate is currently working with children, on either a paid or voluntary basis, the School will ask their current employer about disciplinary offences, including disciplinary offences relating to children or young persons (whether the disciplinary sanction is current or time expired), and whether the candidate has been the subject of any child protection allegations or concerns and if so the outcome of any enquiry or disciplinary procedure. Any

information about past disciplinary action or substantial allegations should be considered in the circumstances of the individual case.

If the candidate is not currently working with children but has done so in the past, the School will ask the previous employer about those issues. Where neither the current nor previous employment has involved working with children, the School will still ask the current employer about the candidate's suitability to work with children. Where the candidate has no previous employment history, the School may request character references which may include references from the candidate's school or university.

The School will only accept references obtained directly from the referee and it will not rely on references or testimonials provided by the applicant or on open references or testimonials. The School will verify all references. Where references are received electronically, the School will ensure they originate from a legitimate source.

The School will compare any information provided by the referee with that provided by the candidate on the Application Form. Any inconsistencies will be discussed with the candidate.

Where a reference is from a school, the headteacher will be asked to confirm the accuracy of the reference in respect of any disciplinary investigation. Referees will be contacted by phone to confirm the reference's legitimacy and to clarify content where information is vague or insufficient.

7. Selection Process

All selection panels will have at least two people, chaired by the Head/Bursar or another designated member of staff appropriate to the role in question. At least one person on the appointment panel will have undertaken Safer Recruitment in Education training. The Chair of the Richard Pate School Committee or Chair of Pate's Grammar School Foundation should chair the panel for the Bursar's/Head's appointment. The interviewers involved will be required to state any prior personal relationship or knowledge of any of the candidates and a judgement will be made by the Chair as to whether or not an interviewer should withdraw from the panel. Should the Chair have a conflict of interest, the Chair of Pate's Grammar School Foundation shall decide whether the Chair should withdraw from the panel.

The selection process will use a range of selection techniques relevant to the role. In addition to a formal interview, this may include, for example, an observed lesson and an in-tray exercise. For teaching posts, pupils will be involved in the selection process in appropriately supervised interactions.

Shortlisted applicants will be invited to attend in person. At the interview, the relevant skills and experience of the candidate will be explored in more detail along with their suitability to work with children where appropriate including any information shared by the candidate in their self-declaration form. Structured questions will be agreed by the interviewers in advance, and will include:

- Finding out what attracted the candidate to the post, and their motivation for working with children.
- Exploring their skills and asking for examples of experience working with children which are relevant to the role.

- Probing any gaps in employment, or frequent changes in employment or location.

Any potential areas of concern arising from the Application Form, references, online checks or self-declaration form will also be probed.

All information considered in decision making will be clearly recorded along with decisions made.

Self-Declaration Form

Shortlisted candidates will be asked to complete a self-declaration form in relation to their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records. Applicants will be asked to sign a declaration confirming that the information they have provided is true. Where there is an electronic signature, the shortlisted candidate will be asked to physically sign a hard copy of the application at the point of interview.

Identity Documents

All candidates invited to interview must bring documents confirming any educational and professional qualifications that are necessary or relevant for the post (e.g. the original or certified copy of certificates, diplomas etc).

The School requests that all candidates invited to interview also bring with them:

- A current passport or a current driving licence including a photograph and a full birth certificate;
- A utility bill or financial statement issued within the last three months showing the candidate's current name and address;
- Where appropriate any documentation evidencing a change of name;
- Where applicable, proof of entitlement to work and reside in the UK.

Please note that originals of the above are necessary. Photocopies or certified copies are not sufficient.

Candidates with a disability who are invited to interview should inform the School of any necessary reasonable adjustments or arrangements to assist them in attending the interview.

8. Conditional Offer of Appointment & Pre-Appointment Vetting Checks

All offers of appointment are conditional upon satisfactory completion of the following mandatory pre-employment checks:

1. References: All job offers are conditional upon receipt of two satisfactory references (if these have not already been received).
2. Verification of identity: the candidate's (original) birth certificate is checked where possible, along with certificates relating to any change of name (e.g. marriage, divorce). A piece of photo identification is also scrutinised – preferably a passport or driving licence. The candidate's current address is also verified by means of a recent utility bill or financial statement.

3. A satisfactory enhanced DBS check and, for those who will be engaging in regulated activity with children, a check of the Children's Barred List maintained by the DBS. The school carries out this check with a third party: UnitedCRB.
4. A separate satisfactory check of the Children's Barred List if an individual will start work in regulated activity which children before the DBS certificate is available. The school carries out this check via the Teaching Regulation Agency.
5. Verification of mental and physical fitness to carry out the work responsibilities. The school carries out this check with the assistance of a third party: Rosebank Medical. A successful candidate must complete a pre-employment health questionnaire. The information contained in the questionnaire will then be held by the School in strictest confidence, and processed in accordance with the Recruitment Privacy Notice and Data Protection Policy. This information will be reviewed against the Job Description and the Person Specification for the particular role, together with details of any other physical or mental requirements of the role i.e. proposed workload, extra-curricular activities, layout of the School. The School is aware of its duties under the Equality Act 2010. No job offer will be withdrawn without first consulting with the applicant, considering medical evidence and considering reasonable adjustments.
6. Verification of right to work in the UK, including EU nationals. The school uses the Government's Right to Work Checklist or online checking service.
7. Further checks on a successful candidate who has lived or worked outside the UK: such further checks and confirmations as the School may consider appropriate so that any relevant events that occurred outside the UK can be considered. This shall include the candidate providing the School with proof of his/her past conduct as a teacher in the form of a letter of professional standing from the professional regulating authority in the country in which s/he has worked;
8. Verification of professional qualifications, as appropriate. Where originals or certified copies are not available for the successful candidate, written confirmation of the relevant qualifications must be obtained by the candidate from the awarding body. The Teaching Regulation Agency is used to verify any award of Qualified Teacher Status, and the completion of teacher induction or probation.
9. Senior Management checks: for a candidate to be employed into a senior management position as set out above under "Scope of this Policy" (including all Governors, Senior Management Team and teaching heads of department), they are required to sign a "senior charity manager positions: automatic disqualification declaration" confirming that they are not disqualified from acting in a senior management position for a charity in accordance with the automatic disqualification rules for charities.
10. Management of the School The Teaching Regulation Agency is used to check the candidate is not subject to a direction made by the Secretary of State under section 128 of the Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014. This applies to all Governors, Senior Management Team and teaching heads of department;
11. Verification of successful completion of statutory induction period - for teaching posts – applies to those who obtained QTS after 7 May 1999.
12. Teacher Prohibition checks: for a candidate to be employed as a teacher, a check that that the candidate is not subject to a prohibition order issued by the Secretary of State or any sanction or restriction imposed (that remains current) by the historic General Teaching Council for England before its abolition in March 2012. Teaching work is defined in The Teachers' Disciplinary (England) Regulations 2012 to encompass:
 - a. Planning and preparing lessons and courses for pupils;
 - b. Delivering and preparing lessons to pupils;
 - c. Assessing the development, progress and attainment of pupils; and
 - d. Reporting on the development, progress and attainment of pupils;

The Teaching Regulation Agency is used to conduct this check.

13. Childcare disqualification checks: on staff employed to work with children aged 5 or under, including reception classes, but also to those working in wraparound care for children up to the age of 8, and to managers of that childcare, to ensure they are not disqualified under the Childcare Disqualification Regulations 2018. The successful candidate will be required to complete and sign a Self-declaration form that addresses this question, as well as be the subject of an Enhanced DBS check with Child Barring List.

Copies of documents used to verify the successful candidate's identity, right to work and required qualification will be kept on their personnel file.

9. Disclosure and Barring Service (DBS) Checks

The successful applicant will be required to complete a Disclosure Form from the Disclosure and Barring Service ("DBS") for the position and, where appropriate, a check of the Barred List will be undertaken. Any offer of employment will be conditional on obtaining such satisfactory checks. Additionally, successful applicants should be aware that they are required to notify the school immediately if they are any reasons why they should not be working with children. This includes any staff who are disqualified from childcare or registration

The statutory guidance "Disqualification under the Childcare Act 2006" applies to those providing early years childcare or later years childcare, including before school and after school clubs, to children who have not attained the age of 8 AND to those who are directly concerned in the management of that childcare.

The school takes its responsibility to safeguard children very seriously and any staff member and/or successful candidate who is aware of anything that may affect his/her suitability to work with children must notify the Head, Bursar or DSL immediately. This will include notification of any convictions, cautions, court orders, reprimands or warnings he/she may receive.

Staff and/or successful candidates who are disqualified from childcare or registration, may apply to Ofsted for a waiver of disqualification. Such individuals may not be employed in the areas from which they are disqualified, or involved in the management of those settings, unless and until such waiver is confirmed. Please speak to the Head or Bursar for more details.

10. Single Central Record (SCR)

The school will maintain a single central record of pre-employment checks for all staff, trustees and third-party supply staff. This will include the date on which each check was completed or certificate obtained. In accordance with KCSIE 2023 the minimum information recorded will be whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:

- Identity check
- Standalone children's barred list check (if required)
- Enhanced DBS check (with children's barred list check if required)
- Prohibition from Teaching check

- Further checks on people who have lived or worked outside the UK
- Check of professional qualification (where appropriate)
- Check of the person's right to work in the UK
- Section 128 check (for those in management positions)

The details of an individual will be removed from the single central record once they no longer work at the school.

Agency and Third-Party Staff

In the case of staff from an agency or third-party organisation, the SCR will confirm whether written confirmation has been received that the employer supplying the staff has carried out the relevant recruitment checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff. Where the agency or organisation has obtained an Enhanced DBS certificate which has disclosed any matter or information, the school will obtain a copy of the certificate from the agency/employer. The school will always check the identity of the agency/third-party member of staff on arrival.

Contractors

The school will ensure that contractors have been subject to the appropriate level of DBS check. The school will always check the identity of the contractor on arrival, and determine the appropriate level of supervision depending on the circumstances.

Completion and Checking the Single Central Record

- Training – the DSL, Headmaster, Bursar and Bursary Administrator have undertaken SCR training.
- Two members of the Bursary Team (Bursar and Bursary Administrator) complete the SCR. Only the Bursary Team has access to the SCR.
- The Safeguarding Trustee and Headmaster regularly (at least annually) reviews the SCR with the Bursar.

11. Criminal Records Policy

The School will refer to the Department for Education ("DfE") document, 'Keeping Children Safe in Education' and any amended version in carrying out the necessary required DBS checks.

The School complies with the provisions of the DBS Code of Practice, a copy of which may be obtained on request or accessed here:

<https://www.gov.uk/government/publications/dbs-code-of-practice>.

There are limited circumstances where the school will accept a check from another educational institution which are as follows:

Where the new member of staff ("M") has worked in: -

- (a) A school or a maintained school in England in a position which brought M regularly into contact with children or young persons;

- (b) A maintained school in England in a position to which M was appointed on or after May 2006 and which did not bring M regularly into contact with children or young persons; or
- (c) An institution within the further education sector in England or in a 16 to 19 Academy in a position which involved the provision of education or which brought M regularly into contact with children or young persons,

during a period which ended not more than three months before M's appointment.

In these circumstances the School may apply for a disclosure but is not required to do so. A new, separate barred list check will be obtained.

DBS Update Service

Where an applicant subscribes to the DBS Update Service the applicant must give consent to the school to check there have not been changes since the issue of a disclosure certificate. A barred list check will still be required.

If disclosure is delayed

A short period of work is allowed under controlled conditions, at the Head's discretion. However, if an 'enhanced disclosure' is delayed, a Head may allow the member of staff to commence work:

- Without confirming the appointment;
- After a satisfactory check of the barred list if the person will be working in regulated activity and all other relevant checks (including any appropriate prohibition checks) having been completed satisfactorily;
- Provided that the DBS application has been made in advance;
- With appropriate safeguards taken (for example, loose supervision);
- Safeguards reviewed at least every two weeks by the Head/Bursar and member of staff;
- The person in question is informed what these safeguards are; and
- It is recommended, but not a requirement, that a note is added to the single central register and evidence kept of the measures put in place. This will be found on the Notes section of the register and in hard copy in the staff file.

8. Retention and Security of Records and Data Protection Obligations.

The School will comply with its obligations regarding the retention and security of records in accordance with the DBS Code of Practice and its obligations under its Data Protection Policy. Copies of DBS certificates will not be retained for longer than 6 months.

The School will comply with its data protection obligations in respect of the processing of criminal records information. More information on this is included in the Recruitment Privacy Notice and the Data Protection Policy.

APPENDIX 1

Policy on the Recruitment of Ex-Offenders

May 2026

The School will not unfairly discriminate against any candidate for employment on the basis of conviction or other details revealed. The School makes appointment decisions on the basis of merit and ability. If an individual has a criminal record this will not automatically bar him/her from employment within the School. Instead, each case will be decided on its merits in accordance with the objective assessment criteria set out below.

All candidates should be aware that provision of false information is an offence and could result in the application being rejected or summary dismissal if they have been appointed, and a possible referral to the police and/or DBS.

Under the relevant legislation, it is unlawful for the School to employ anyone who is included on the lists maintained by the DBS of individuals who are considered unsuitable to work with children. In addition, it will also be unlawful for the School to employ anyone who is the subject of a disqualifying order made on being convicted or charged with the following offences against children: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence. It is also unlawful for the School to knowingly employ someone who works in the relevant settings and is disqualified from providing childcare under the statutory guidance "Disqualification under the Childcare Act 2006".

It is a criminal offence for any person who is disqualified from working with children to attempt to apply for a position within the School. The School will report the matter to the Police and/or the DBS if:

- the School receives an application from a disqualified person;
- is provided with false information in, or in support of an applicant's application; or
- the School has serious concerns about an applicant's suitability to work with children,

In the event that relevant information (whether in relation to previous convictions or otherwise) is volunteered by an applicant during the recruitment process or obtained through a disclosure check, the School will consider the following factors before reaching a recruitment decision:

- whether the conviction or other matter revealed is relevant to the position in question;
- whether the conviction or caution is 'protected' as defined by the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (Amendment) (England and Wales) Order 2020 (if yes, it will not be taken into account);
- the seriousness of any offence or other matter revealed;
- the length of time since the offence or other matter occurred;
- whether the applicant has a pattern of offending behaviour or other relevant matters;
- whether the applicant's circumstances have changed since the offending behaviour or other relevant matters;
- in the case of disqualification from providing childcare, whether the applicant has or is able to obtain an Ofsted waiver from disqualification; and

- the circumstances surrounding the offence and the explanation(s) offered by the convicted person.

If the post involves regular contact with children, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of any the following offences: murder, manslaughter, rape, other serious sexual offences, grievous bodily harm or other serious acts of violence, serious class A drug related offences, robbery, burglary, theft, deception or fraud.

If the post involves access to money or budget responsibility, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted at any time of robbery, burglary, theft, deception or fraud.

If the post involves some driving responsibilities, it is the School's normal policy to consider it a high risk to employ anyone who has been convicted of drink driving.

APPENDIX 2

Recruitment Privacy Notice

Richard Pate School

Data Protection Privacy Notice (Recruitment)

May 2026

This notice explains what personal data (information) we will hold about you, how we collect it, and how we will use and may share information about you during the application process. It applies to all individuals applying for a position at the School, including positions as a member of staff (full time or part time), contractors, workers, governors, volunteers and peripatetic staff. It also applies to individuals we will contact in order to find out more about our job applicants, including referees, or those that are provided by job applicants as an emergency contact.

You are being sent a copy of this privacy notice because you are applying to work with us (whether as an employee, worker or contractor). We are required to notify you of this information, under data protection legislation. Please ensure that you read this notice (sometimes referred to as a 'privacy notice') and any other similar notice we may provide to you from time to time when we collect or process personal information about you.

WHO COLLECTS THE INFORMATION

The Trustees of Pate's Grammar School Foundation including The Richard Pate School ('School') is a 'controller' in relation to personal data and gathers and uses certain information about you. This means that we are responsible for deciding how we hold and use your personal information.

The School's contact details are as follows:

Postal Address: Southern Road, Cheltenham, Gloucestershire, GL53 9RP

Telephone: 01242 522086

Email address: hm@richardpate.co.uk

DATA PROTECTION PRINCIPLES

We will comply with the data protection principles when gathering and using personal information, as set out in our *Staff Data Protection Policy* and Privacy Notice. This 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 a 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 safely and securely.

ABOUT THE INFORMATION WE COLLECT AND HOLD

The table set out in Part 1 of schedule 1 below summarises the information we collect and hold up to and including the shortlisting stage of the recruitment process, how and why we do so, how we use it and with whom it may be shared.

The table in Part 2 of schedule 1 below summarises the additional information we collect before making a final decision to recruit, ie before making an offer of employment unconditional, how and why we do so, how we use it and with whom it may be shared.

We seek to ensure that our information collection and processing is always proportionate and necessary for specific and legitimate purposes. We will notify you of any changes to information we collect or to the purposes for which we collect and process it.

WHERE INFORMATION MAY BE HELD

Information may be held on school premises, in our filing systems and on our servers. It may also be held on our behalf by third party agencies, service providers and representatives.

HOW LONG WE KEEP YOUR INFORMATION

We keep the personal information that we obtain about you during the recruitment process for no longer than is necessary for the purposes for which it is processed. How long we keep your information will depend on whether your application, or the application you are supporting (e.g. as a referee) is successful and you (the job applicant) become employed by us, the nature of the information concerned and the purposes for which it is processed.

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 twelve months from the communication of the outcome of the recruitment exercise which takes into account 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.

If your application is successful and you join the School, and once the twelve month period set out above comes to an end, we will keep only the recruitment information that is necessary in relation to your employment. For further information, see the Staff Privacy Notice.

If we wish to retain your personal information on file, on the basis that a further opportunity may arise in future and we may wish to consider you for that, we will write to you separately, seeking your explicit consent to retain your personal information for a fixed period on that basis.

YOUR DATA RIGHTS TO CORRECT AND ACCESS YOUR INFORMATION AND TO ASK FOR IT TO BE ERASED

Please contact the Bursar who is part of our Information Management Committee; she can be contacted on: dataprotection@richardpate.co.uk or 01242 522052, or Information Management Committee, The Richard Pate School, Southern Road, Cheltenham, GL53 9RP, if (in accordance with applicable law) you would like to correct or request access to information that we hold relating to you or if you have any questions about this notice. You

also have other rights including the right to ask for information we hold and process to be erased (the 'right to be forgotten') or not used in certain circumstances. The Bursar will provide you with further information about your data rights, if you ask for it. You may also want to read the Staff Privacy Notice which provides more detail on this.

KEEPING YOUR PERSONAL INFORMATION SECURE

We have appropriate security measures in place to prevent personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. This includes personal information being locked away, password protected or encrypted. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

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

HOW TO COMPLAIN

Our Bursar oversees compliance with this privacy notice. We hope that our Bursar as a member of the Information Management Committee can resolve any query or concern you raise about our use of your information. If not, contact the Information Commissioner at <https://ico.org.uk/concerns/> or telephone 0303 123 1113 for further information about your rights and how to make a formal complaint.

SCHEDULE 1 ABOUT THE INFORMATION WE COLLECT AND HOLD

Part 1 Up to and including the shortlisting stage

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Your current and any former names, title, date of birth, gender, National Insurance number, and contact details (ie current address, home and mobile phone numbers, email address)</p>	<p>From you</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to progress your application, arrange interviews and inform you of the outcome at all stages</p>	<p>To enable Bursary administration team or the manager of the relevant department to contact you to progress your application, arrange interviews and inform you of the outcome</p> <p>To inform the relevant manager of department of your application</p>
<p>Details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests</p>	<p>From you, in the completed application form and interview notes (if relevant)</p>	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit</p>	<p>To make an informed recruitment decision</p> <p>The person making the shortlisting decision and, if you are invited for interview, the interviewer will receive details</p>
<p>Information about you that is publicly available online through online searches</p>	<p>From standard online searches using a web browser, website, or social media platform.</p>	<p>Legitimate interest: to form part of the school's wider safeguarding due diligence.</p> <p>Legitimate interest: to make an informed decision to shortlist for interview and (if relevant) to recruit.</p> <p>To comply with our legal obligations</p>	<p>To make an informed recruitment decision.</p> <p>The member of staff carrying out the search, if not involved in the decision-making process, may share any relevant information related to suitability with the individuals who will be interviewing. This way the decision makers will only have the relevant information that may need to be addressed at interview and will not be</p>

		<p>including those contained in the statutory guidance for schools:</p> <p><i>Keeping Children Safe in Education (KCSIE)</i></p>	<p>exposed to other information). Search results will be reviewed and, if appropriate, explored with the applicant at interview. To comply with legal/regulatory obligations. For further information, see * below</p>
<p>Your racial or ethnic origin, sex and sexual orientation, religious or similar beliefs</p>	<p>From you, in a completed anonymised equal opportunities monitoring form</p>	<p>To comply with our legal obligations and for reasons of substantial public interest (equality of opportunity or treatment)</p>	<p>To comply with our equal opportunities monitoring obligations and to follow our equality and other policies</p> <p>For further information, see * below</p>
<p>Criminal Record Information or information that would make you unsuitable to work with children</p>	<p>From your self-declaration form</p>	<p>Legitimate interest: to carry out a fair recruitment process including giving candidates the opportunity to discuss their disclosure with the school before a DBS check is obtained.</p> <p>To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education (KCSIE)</i></p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p> <p>For further information, see * below</p>

Details of your referees	From your completed application form	<p>Legitimate interest: to carry out a fair recruitment process</p> <p>To comply with our legal obligations to request references</p>	<p>To carry out a fair recruitment process</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers, Bursary admin and the referee</p>
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Part 2 Before making a final decision to recruit

The information we collect	How we collect the information	Why we collect the information	How we use and may share the information
<p>Information about your previous academic and/or employment history, including details of any conduct, grievance or performance issues, appraisals, time and attendance, the reason you left your current or most recent post, and facts of any substantiated safeguarding concerns/allegations that meet the harm threshold under the statutory guidance "<i>Keeping Children Safe in Education</i>" (KCSIE), from references obtained about you from previous employers and/or education providers <input type="checkbox"/></p>	<p>From your referees (details of whom you will have provided)</p>	<p>Legitimate interest: to make an informed decision to recruit</p> <p>To comply with our legal obligations including those contained in the statutory guidance for schools: <i>Keeping Children Safe in Education</i> (KCSIE).</p> <p>Legitimate interests: to maintain employment records and to comply with legal, regulatory and governance obligations and good employment practice</p>	<p>To obtain the relevant reference about you</p> <p>To comply with legal/regulatory obligations</p> <p>Information shared with relevant managers and Bursary admin.</p>

<p>Information regarding your academic and professional qualifications <input type="checkbox"/></p>	<p>From you, from your education provider, from the relevant professional body</p>	<p>Legitimate interest: to verify the qualifications information provided by you</p>	<p>To make an informed recruitment decision</p>
<p>Information regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs) in accordance with the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (as amended) and, where appropriate, overseas criminal records checks <input type="checkbox"/></p>	<p>From you and from the Disclosure and Barring Service (DBS)</p> <p>From overseas jurisdictions in accordance with Home Office guidance</p> <p>In respect of agency and third-party staff (supply staff), from any agency or third party organisation</p>	<p>To perform the employment contract</p> <p>To comply with our legal obligations</p> <p>Legitimate interest: to verify the criminal records information provided by you</p> <p>For reasons of substantial public interest (preventing or detecting unlawful acts, and protecting the public against dishonesty)</p>	<p>To make an informed recruitment decision</p> <p>To carry out statutory checks</p> <p>Information shared with DBS and other regulatory authorities as required</p> <p>For further information, see * below</p>
<p>In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach <input type="checkbox"/></p>	<p>From a letter from the professional regulating authority in the country (or countries) in which you have worked</p>	<p>Legitimate interest: to make an informed decision to recruit</p>	<p>In respect of applicants for teaching positions who have lived or worked outside the UK, information about any sanctions or restrictions and/or any circumstances impacting your suitability to teach</p> <p><input type="checkbox"/></p>
<p>Your nationality and immigration status and information from related documents, such as your passport or other identification and immigration information <input type="checkbox"/></p>	<p>From you and, where necessary, the Home Office</p>	<p>To enter into/perform the employment contract</p> <p>To comply with our legal obligations</p>	<p>To carry out right to work checks</p> <p>Information may be shared with the Home Office</p>

		Legitimate interest: to maintain employment records	
Information regarding your health, including your medical history, present health status and any workplace adjustments required <input type="checkbox"/>	From you, including via a health questionnaire and medical examination	To comply with our legal obligations including those contained in the Equality Act 2010 and statutory guidance for schools: Keeping Children Safe in Education (KCSIE)	Information regarding your health, including your medical history, present health status and any workplace adjustments required <input type="checkbox"/>
A copy of your driving licence <input type="checkbox"/>	From you	To enter into/perform the employment contract To comply with our legal obligations To comply with the terms of our insurance	To make an informed recruitment decision To ensure that you have a clean driving licence Information may be shared with our insurer

You are required (by law or in order to enter into your contract of employment) to provide the categories of information marked '☐' above to us to enable us to verify your right to work and suitability for the position.

* Further details on how we handle sensitive personal information and information relating to criminal convictions and offences are set out in our Staff Data Protection Policy, set out in our Staff Handbook and available from the Bursar.