



Recruitment Privacy Notice (Staff Employment)

Document control

Item	Detail
Policy title	Recruitment Privacy Notice (Staff Employment)
Category	Data Protection and Compliance
Statutory status	Required by Articles 13 and 14 of the UK GDPR.
Policy owner	Bursar (the School's designated data protection contact)
Senior leader responsible	Bursar
Effective date	1 September 2026
Review cycle	Annual
Next review date	September 2027
Publication	Published on the School website (vacancies section) and provided to all applicants at the outset of the recruitment process

Policy summary

This notice explains what personal information we hold about you when you apply for a position at Cokethorpe, how we collect it, why we use it and what our lawful bases are, who we share it with, how long we keep it, and the rights you have. It applies to all applicants for employment or engagement, including staff, contractors, volunteers and Governors.

The Bursar is the School's designated data protection contact (bursar@cokethorpe.org, 01993 892327); the School has assessed its processing and determined that it is not required to appoint a Data Protection Officer.

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1 Why this matters

Thank you for your interest in working at Cokethorpe School. Applying for a role means sharing personal information with us, sometimes information that is private or sensitive, and we take that trust seriously. We want you to know exactly what we collect, why we need it, who sees it, how long we keep it and what rights you have.

We also have a duty to safeguard and promote the welfare of the children in our care. Some of the information we ask for, and some of the checks we carry out, exist for that reason and are required of us by law and by statutory guidance. We aim to gather only what we genuinely need, to handle it fairly and securely, and to be open with you about what we are doing.

This notice is provided to you under Articles 13 and 14 of the UK General Data Protection Regulation (UK GDPR). It does not form part of any contract of employment or engagement, and it does not confer or imply any employment status.

2 Who we are

Cokethorpe School (the School) is the data controller for the personal data described in this notice. Our registered address is Cokethorpe School, Witney, Oxfordshire OX29 7PU. Our company registration number is 0767293, our charity registration number is 309650, and our registration number with the Information Commissioner's Office is Z5441947.

3 Our data protection contact

The School has assessed its processing and has determined that it is not required to appoint Data Protection Officer under Article 37 of the UK GDPR. The Bursar is the Schools designated data protection contact and the senior individual responsible for data protection and will deal with any query, request or complaint about how we use your personal data.

Contact: bursar@cokethorpe.org | 01993 892327

4 Who this notice applies to

This notice applies to everyone who applies for a position at the School, whether as an employee (full time or part time), a worker, a contractor, a visiting or peripatetic member of staff, a casual or temporary member of staff, a volunteer or a governor. References to "employment", "recruitment" and "staff" are not intended to imply or confer any employment status or rights on you.

If you are appointed, the School's Staff Privacy Notice will apply to you from that point and will explain how we use your information during and after your employment or engagement.

5 How we collect information about you

Most of the information we hold about you comes from you: from an enquiry or expression of interest, from your application form, from any supporting documents you provide, from a self-declaration form, from what you tell us at interview or assessment, and from the documents you bring with you to verify your identity, qualifications and right to work.

We also obtain information about you from others, namely:

- your referees, including your current or previous employers and any education providers you name;

- the Disclosure and Barring Service (DBS) and, where applicable, other statutory and regulatory bodies such as the Teaching Regulation Agency, the Home Office and overseas authorities where you have lived or worked abroad;
- publicly available online sources, where we carry out an online search on shortlisted candidates (see below);
- where you are a contractor, an agency worker or a substitute, your own employer, agency or agent.

6 The information we collect and hold

We collect information in two stages, so that we ask for sensitive information only when we genuinely need it.

Stage 1 — up to and including shortlisting

To run a fair, lawful and proportionate recruitment process we collect:

- your name and contact details, including your address, home and mobile telephone numbers and email address;
- details of your qualifications, experience, employment history (including job titles, salary and working hours) and interests;
- your self-declaration about criminal records, in the form and at the point set out in our Safer Recruitment (see Safer Recruitment Policy and Procedures)
- the details of your referees;
- for shortlisted candidates, information available from an online search, where this may raise a matter we should discuss with you at interview in connection with your suitability to work with children.

Stage 2 — before we make a final decision to recruit

Before an offer is made unconditional we collect:

- information from references, which may include your academic and employment history and details of any conduct, grievance or performance issues, appraisals, and time and attendance records;
- confirmation of your academic and professional qualifications;
- information about criminal records, including an enhanced DBS certificate with barred list information where the role is in regulated activity, and, where applicable, prohibition and other statutory checks;
- your nationality, immigration status and right to work in the UK, taken from identity documents such as your passport;
- a copy of your driving licence, taken having viewed the original, where driving forms part of the role; and
- health information provided in a health questionnaire after an offer has been made, so that we can consider fitness for the role and any reasonable adjustments you may need.

Health information is requested after an offer is made, not before, in line with the restrictions on pre-offer health and disability enquiries under the Equality Act 2010 and with the School's Safer Recruitment Policy and Procedures.

7 Sensitive information

Some of the information above is special category data or criminal offence data under data protection law. This includes information about your health, information about criminal

convictions, cautions, offences and allegations, and any equality and diversity information you choose to give us. We collect this only where it is necessary and lawful, we limit access to it strictly, and we apply additional safeguards to it. Where we rely on a condition in Schedule 1 to the Data Protection Act 2018, we do so in accordance with the School's Appropriate Policy Document.

Any equality and diversity monitoring information you provide is voluntary, is used only in anonymised or aggregated form to monitor and improve the fairness of our recruitment, and is not seen by those making the selection decision.

8 Why we use your information, and our lawful bases

Taking steps at your request before entering into a contract

We use your information to administer your application, to correspond with you, to shortlist, interview and assess candidates, to make an informed recruitment decision, and to make and administer an offer of employment or engagement.

Compliance with our legal obligations

We use your information to carry out the pre-appointment checks that the law and statutory guidance require of us, including identity, right to work, qualification, prohibition, barred list and DBS checks, to record those checks on the Single Central Register, and to meet our obligations in relation to safeguarding, equality, immigration, employment and tax.

Our legitimate interests

We use your information to run the School and its recruitment in a professional, safe and sustainable way. This includes giving you information about the School and the role, keeping records of the recruitment process so that we can explain and, if necessary, defend our decisions, protecting the security of our site and systems, and planning our staffing. We consider the effect on you whenever we rely on this basis, and you may object to it on grounds relating to your particular situation.

Special category and criminal offence data

Where we process special category or criminal offence data we rely on one or more of the following: that it is necessary for the purposes of carrying out our obligations and exercising rights in the field of employment law; that it is necessary in the substantial public interest for safeguarding children, for the prevention or detection of unlawful acts, or for protecting the public against dishonesty, malpractice or other seriously improper conduct; that it is necessary to establish, exercise or defend legal claims; that it is necessary to protect your or another person's vital interests; or, where it is appropriate to seek it, your explicit consent.

9 Do you have to provide this information?

Providing the information we ask for at application stage is voluntary, but if you do not provide it we may not be able to consider your application. The pre-appointment checks described in Stage 2 are required of the School by law and by statutory guidance, and we cannot confirm an appointment without them.

10 Online searches on shortlisted candidates

In line with statutory safeguarding guidance, we may carry out an online search on shortlisted candidates. The purpose is limited: to identify anything publicly available that we should discuss

with you at interview in connection with your suitability to work with children. We keep the search proportionate, we record only what is relevant, and you will have the opportunity to comment on anything we raise.

11 Who we share your information with

We share your information internally only with those who need it: the recruiting manager or department, the Head or the Bursar as appropriate, HR, and the Designated Safeguarding Lead where a safeguarding matter arises. Externally, we may share your information with:

- your referees and previous employers, in order to seek and verify references;
- the Disclosure and Barring Service and third-party providers who process DBS applications on our behalf;
- government departments, agencies and regulatory bodies where we are required or entitled to share it, including the Department for Education, the Teaching Regulation Agency, the Independent Schools Inspectorate, the Home Office, HM Revenue and Customs, the local authority (including the Local Authority Designated Officer) and the police;
- our insurers, where relevant — for example, driving licence information where driving forms part of the role;
- our professional advisers, including lawyers and auditors, where we need their advice or assistance;
- our service providers who process information on our behalf, for example our IT and recruitment systems providers, who act on our instructions and under contract.

We do not sell your personal data, and we do not share it with anyone else unless the law requires or permits it.

12 Where your information is held, and transfers outside the UK

Your information is held on the School's systems and premises and with the service providers described above. Where personal data is transferred outside the United Kingdom, we make sure appropriate safeguards are in place, such as reliance on UK adequacy regulations or an approved data transfer agreement.

13 Automated decision-making

We do not make recruitment decisions about you by solely automated means, and we do not use automated profiling that produces legal or similarly significant effects. Decisions about shortlisting and appointment are made by members of staff.

14 How long we keep your information

We keep recruitment information only for as long as we need it.

- If your application is not successful, we keep your application and recruitment records, including interview notes, for twelve months from the date we tell you the outcome, and then destroy them securely.
- We may keep records for longer where there is a clear reason to do so, for example where a complaint or claim has been made or is reasonably anticipated. Where we do, we will consider first whether the records can be pseudonymised, and we will tell you.

- If your application is successful, we keep only the recruitment information that remains necessary in relation to your employment or engagement, and it is then held in accordance with the Staff Privacy Notice.
- A DBS certificate is not retained beyond six months. We keep a permanent record that the check was carried out, as we are required to do.

Further detail is set out in the School's Guidelines on the Storage and Retention of Records.

15 Keeping your information secure

We have appropriate technical and organisational measures in place to protect your information against loss, misuse and unauthorised access. Access is limited to those who have a genuine need for it, and everyone handling your information does so under a duty of confidentiality. We have procedures for dealing with any suspected personal data breach, and we will notify you and the Information Commissioner's Office where the law requires us to do so.

16 Your rights

You have the right:

- to ask for access to, and copies of, the personal data we hold about you;
- to ask us to correct personal data that is inaccurate;
- to ask us, in certain circumstances, to erase your personal data;
- to ask us, in certain circumstances, to restrict how we use your personal data;
- to receive personal data you have provided to us in a portable format, in certain circumstances;
- to object, on grounds relating to your particular situation, to processing we carry out on the basis of our legitimate interests; and
- where we rely on your consent, to withdraw it at any time, without affecting the lawfulness of what we did before you withdrew it.

These rights are not absolute and exemptions may apply — for example, references given or received in confidence may not be accessible. We will respond to a request as soon as we reasonably can, and in any event within one month, though complex or multiple requests may take up to two months longer, in which case we will tell you.

You can find out more about your rights from the Information Commissioner's Office at www.ico.org.uk.

17 Questions and complaints

If you have a question about this notice, or you would like to exercise any of your rights, please contact the Bursar at bursar@cokethorpe.org or on 01993 892327.

If you are unhappy with how we have handled your personal data, please tell us so that we can put it right. We will acknowledge your complaint within 30 days of receiving it, investigate it and keep you informed, and tell you the outcome without undue delay.

You also have the right to complain to the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/data-protection-complaints/> or on 0303 123 1113. The ICO asks that you try to resolve the matter with us first.

18 Changes to this notice

We review this notice regularly and will update it when our practices change. Any substantial change that affects your rights will be published on the School's website and, where reasonably practicable, drawn to the attention of applicants currently in the process. This notice was last updated on 1/9/2026.

19 Related School policies and procedures

This notice should be read in conjunction with the following School policies and procedures:

- the School's Privacy Notice;
- the Staff Privacy Notice;
- the Safer Recruitment Policy and Procedures;
- the Policy on the Recruitment of Ex-Offenders;
- the Guidelines on the Storage and Retention of Records;
- the Safeguarding and Child Protection Policy and Procedures;
- the Equal Opportunities Policy for Staff;
- the Staff Behaviour Policy (Code of Conduct) and the Employee Handbook;
- the Data Protection Policy for Staff and the School's Appropriate Policy Document [Verification required — confirm the current titles and status of these two documents].

20 Legislation, regulation and guidance

This notice takes account of the following. Where guidance has more than one current version, the position is stated.

- UK General Data Protection Regulation and the Data Protection Act 2018, including Schedule 1 and section 164A.
- Data (Use and Access) Act 2025 — the duty on organisations to handle data protection complaints (section 164A DPA 2018) came into force on 19 June 2026:
<https://www.gov.uk/government/collections/data-use-and-access-act-2025> and
<https://ico.org.uk/about-the-ico/what-we-do/legislation-we-cover/data-use-and-access-act-2025/>
- ICO — Employment practices and data protection: recruitment and selection:
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/employment/recruitment-and-selection/> (draft guidance; consultation closed, final version awaited, and under review following the Data (Use and Access) Act).
- ICO — Employment practices and data protection: keeping employment records:
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/employment/employment-practices-and-data-protection-keeping-employment-records/> (final guidance published 5 February 2025; under review following the Data (Use and Access) Act).
- DfE — Keeping Children Safe in Education:
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--KCSIE> 2026 comes into force from 1 September 2026.
- DfE — Regulated activity: removal of the supervision exemption (comes into force 1 September 2026), updated 29 June 2026:
<https://www.gov.uk/government/publications/working-or-volunteering-in-regulated-activity-with-children/regulated-activity-removal-of-the-supervision-exemption-comes-into-force-1-september-2026>

- DSIT — Responsible AI in Recruitment, published 25 March 2024: <https://www.gov.uk/government/publications/responsible-ai-in-recruitment-guide/responsible-ai-in-recruitment> (relevant only if the School adopts AI-assisted recruitment tools).
- Equality Act 2010, Rehabilitation of Offenders Act 1974 and the Exceptions Order made under it, and the Immigration, Asylum and Nationality Act 2006.

21 Version history

Version / date	Summary of change	Author
[TO BE CONFIRMED]	Previous approved version.	[TO BE CONFIRMED]
August 2026 (draft)	Full review of the September 2025 notice against ISBA Doc 201 (revision 13 July 2026), the UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025; lawful bases, special category and criminal offence data, the data protection contact, retention, data subject rights and the complaints process added or corrected.	Policy Review
August 2026 (V4)	Reformatted to the School policy template (V4): document control moved to the front, policy summary and scoped contents field added, heading hierarchy normalised, version history added. No change of substance. DRAFT — not yet approved.	Policy Review
August 2026 (V4.1)	Applicant record retention confirmed as twelve months from the date the applicant is notified of the outcome, replacing [TO BE CONFIRMED] and resolving the conflict between School sources; the review item on the statutory data protection officer closed (no DPO required; the Bursar is the designated data protection contact). Agreed by the Bursar, 25 August 2026.	Policy Review