



Leamington Federation

Lighthorne Heath Primary School

Privacy Notice for Applicants - How we use your information

2026/27

Who are we?

Lighthorne Heath Primary School, part of the Leamington Federation, is the data controller for the personal information described in this notice. This means that the school decides why and how this information is used. The school is registered with the Information Commissioner's Office (ICO), registration number Z737279X.

You can contact the school at: Lighthorne Heath Primary School, Stratford Road, Lighthorne Heath, Leamington Spa, Warwickshire, CV33 9TW; email admin2064@welearn365.com.

Our Data Protection Officer

Our Data Protection Officer (DPO) is the School Data Protection Officer Service, Warwickshire Legal Services. You can contact the DPO at schooldpo@warwickshire.gov.uk, telephone 01926 412859, or by post at Warwickshire Legal Services, Warwickshire County Council, Shire Hall, Market Square, Warwick, CV34 4RL. Please state that your enquiry relates to Lighthorne Heath Primary School.

About this privacy notice

This notice explains how we collect, use, store and share personal information about job applicants and prospective employees. It is provided in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, as amended by the Data (Use and Access) Act 2025. We also follow current Department for Education (DfE) data protection guidance for schools and relevant ICO guidance.

We review privacy information at least annually and whenever there is a significant change to the way personal information is used. Where a new use would not reasonably be expected, we will update this notice and bring the change to the attention of affected individuals before the new processing begins.

What personal information do we collect?

- identity and contact details, including previous names where relevant;
- application information, employment and education history, qualifications, professional registrations, teacher reference number where applicable, reasons for leaving previous roles and explanations for gaps;
- information provided in personal statements, assessments, interview notes and selection exercises;
- references and factual information obtained from current and previous employers or other referees;
- right-to-work and identity documentation and information needed to verify professional qualifications;
- safer recruitment information, including DBS information, Children's Barred List information where legally permitted or required, teacher prohibition checks, relevant childcare disqualification information and overseas checks where appropriate;
- publicly available online information identified through proportionate online searches of shortlisted candidates, where undertaken as part of safer recruitment;
- health or disability information needed to make reasonable adjustments during recruitment and, after a conditional offer, information needed to assess fitness for the role or occupational health support;
- equality monitoring information such as age, disability, ethnicity, religion or belief, sex and sexual orientation, normally separated from the selection decision; and
- any other information you choose to provide that is relevant to your application.

Where does the information come from?

Most information comes directly from you. We may also obtain information from referees and former employers, the Disclosure and Barring Service (DBS), the Teaching Regulation Agency or relevant professional bodies, right-to-work checking services, overseas authorities where appropriate, occupational health providers after a conditional offer, recruitment platforms, and publicly accessible online sources used for safer-recruitment checks.

Why do we use applicant information?

- administer the recruitment and selection process and communicate with you;
- assess your skills, experience, qualifications, values and suitability for the role;
- make reasonable adjustments and support fair access to recruitment;
- carry out safer recruitment and pre-employment checks required or permitted by law and Keeping Children Safe in Education 2026;
- verify identity, right to work, qualifications and employment history;
- monitor equality of opportunity and the effectiveness of recruitment processes using appropriately restricted or aggregated data;
- defend or manage legal claims and meet audit, safeguarding and regulatory requirements; and
- if you are appointed, take steps to enter into and administer the employment relationship.

Our lawful bases for using personal information

We only use personal information where data protection law allows us to do so. Depending on the purpose, our lawful bases under Article 6 UK GDPR may include:

- Article 6(1)(b) - taking steps at your request before entering into a contract and, if appointed, performance of the employment contract;
- Article 6(1)(c) - compliance with legal obligations, including safer recruitment, right-to-work, employment, equality and safeguarding requirements;
- Article 6(1)(e) - performance of tasks carried out in the public interest or in the exercise of official authority as a maintained school; and
- Article 6(1)(d) - protection of vital interests in a genuine emergency. Consent is used only where it is appropriate and can be freely withdrawn.

Where we use special category data, such as health, ethnicity, religious belief, trade union membership or information about a person's sex life or sexual orientation, we also identify a condition under Article 9 UK GDPR and Schedule 1 of the Data Protection Act 2018. These commonly include employment and social protection obligations, substantial public interest, health or social care, vital interests, legal claims, or explicit consent where consent is genuinely appropriate.

Criminal offence and safeguarding-vetting information is handled only where authorised by law, including Article 10 UK GDPR and the Data Protection Act 2018, and is subject to additional safeguards and restricted access.

Online searches of shortlisted candidates

In line with safer recruitment expectations, the school may carry out a proportionate online search on shortlisted candidates to identify publicly available information that may be relevant to safeguarding or suitability to work with children. Searches are not used as a substitute for statutory checks. Any information of concern will be considered fairly, in context, and candidates will normally have an opportunity to explain relevant findings before a decision is made.

Who may we share applicant information with?

- members of the recruitment panel and authorised school staff;
- Warwickshire County Council services supporting HR, payroll, legal, safeguarding or recruitment functions where applicable;
- referees, former employers and professional bodies for verification;
- DBS, Teaching Regulation Agency, Home Office/right-to-work services and other statutory bodies where required;
- occupational health providers following a conditional offer where relevant;
- our recruitment, IT and data-processing suppliers under contract; and

- law enforcement, safeguarding agencies, regulators, courts or insurers where disclosure is lawful and necessary.

How we keep information secure

We use appropriate technical and organisational measures to protect personal information against accidental or unlawful loss, alteration, disclosure or access. Access is limited to people who need the information for their role. Our service providers must process information only on our instructions, keep it secure and meet data protection requirements.

How long we keep information

If your application is unsuccessful, recruitment records will normally be retained for 6 months after the recruitment exercise is completed, unless there is a clear legal or operational reason to retain them for longer. If you are appointed, relevant recruitment information will become part of your staff record and will be retained in accordance with the staff retention schedule and any applicable safeguarding or statutory requirements.

Records are securely deleted, destroyed or anonymised when they are no longer required. Our retention arrangements are reviewed regularly and are informed by the school's retention schedule, DfE guidance and the Information and Records Management Society (IRMS) Schools Toolkit where applicable.

International transfers

Some suppliers may store or access information outside the UK. Where this happens, we ensure that a lawful transfer mechanism and appropriate safeguards are in place, for example UK adequacy regulations or approved contractual safeguards, and we assess the protection available for the information concerned.

Automated decision-making and artificial intelligence

We do not currently use solely automated decision-making that produces legal or similarly significant effects on individuals. If this changes, or if we introduce an AI-enabled system that uses personal information in a way that could materially affect individuals, we will assess the data protection risks, update our privacy information where necessary and provide meaningful information about the use of the system.

Your data protection rights

Depending on the circumstances and the lawful basis being used, you may have the right to:

- ask for access to your personal information and receive a copy of it;
- ask us to correct inaccurate or incomplete information;
- ask us to erase information in certain circumstances;
- ask us to restrict the use of information in certain circumstances;
- object to particular uses of personal information in certain circumstances;
- receive personal information in a portable format where the right to data portability applies;
- withdraw consent at any time where we rely on consent; withdrawal does not affect processing already carried out lawfully; and
- challenge a decision based solely on automated processing where the law gives that right.

These rights are not absolute and may be limited where another legal duty or exemption applies. We will explain this if it affects a request. Requests can be made to the school or the DPO. We normally respond to valid data protection rights requests within one month, subject to the rules in data protection law.

Concerns and complaints

If you have a concern about how we use personal information, please contact the school or our DPO first so that we can try to resolve it. You also have the right to complain to the Information Commissioner's Office (ICO). Current contact details and complaint routes are available at ico.org.uk.

Reviewed: September 2026

Next review: September 2027

Chair of Governors: Richard Butler