

# PRIVACY NOTICE - CANDIDATES, SOURCES, REFEREES, AND PARTICIPANTS

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## 1 INTRODUCTION

This notice, provided by RSAcademics Ltd (referred to as “RSAcademics”, “we”, “us” or “ourselves”), has been published to advise Candidates, Sources and Participants with whom we interact, how RSAcademics collects, uses, discloses and manages your data.

RSAcademics is a market-leading consultancy working with schools across the world. We provide a variety of services to our Clients and other parties, including, but not limited to: leadership appointments, market research, strategy and marketing planning, fundraising, governance and compliance consultancy and Leadership Development.

Our registered company number is 4325816 and registered address is Reedham House, 31 King Street West, Manchester M3 2PJ.

For the purposes of this notice, RSAcademics is the Data Controller.

## 2 DEFINITIONS

**Candidate** – means an individual identified as being potentially suitable for an appointment we are handling on behalf of a Client or ourselves

**Client** – means a client of RSAcademics to which a Candidate is introduced by RSAcademics

**Leadership Development** – means any Leadership Development service offered by RSAcademics, such as personality testing, coaching, appraisals, succession planning, transition management, team effectiveness and management audits. These services are provided to our Clients for the purposes of assessing and developing the performance and/or leadership potential of either its own Personnel or other individuals selected by the Client

**Data Controller** – means the body that determines the purposes for which and the manner in which any personal data are, or are to be, processed

**Data Processor** – means any person or entity (other than RSAcademics Personnel) who processes personal data on our behalf

**Participant** – an individual involved in a Leadership Development service

**Personal Data** – means any information relating to an identified or identifiable natural person

**Personnel** - means any current, former or prospective employee, consultant, temporary worker, intern, other non-permanent employee, contractor or other personnel

**Processing, Process** – in relation to Personal Data means the obtaining, recording, adapting, structuring, retrieving, disclosing, using, transmitting, disseminating or otherwise making available or erasure and destruction of the data, whether or not by automated means

**Special Categories of Personal Data** – means personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership and data concerning health or a person's sex life or sexual orientation

**Source** – means any person that provides information, including opinions, on the skills and qualities of a Candidate or their suitability for a specific role or type of type of role

### **3 HOW DO WE COLLECT INFORMATION FROM YOU?**

In the course of our interaction with you we may collect Personal Data about you. Your Personal Data is provided to us in a number of different ways, including:

- directly from you when you provide it to us (for example when you correspond with us by mail, phone, email or when you send us your CV or submit an application form in relation to a Client opportunity or a vacancy with RSAcademics)
- from the public domain, including via social media and networking platforms such as LinkedIn (insofar as you choose to make your profiles publicly visible)
- from third parties who provide it to us (for example referees, Sources, other employers and law enforcement agencies)

**Creation of personal data** - to fulfil our obligations to you and our Clients, we may also create Personal Data about you, such as notes from any interviews you attend.

**Data you may provide about others** – during our interactions with you, you may provide us with Personal Data about other people (for example, you may act as a Source or referee and provide information and opinions on a Candidate or Participant). In these instances, we rely on you to ensure that you have a lawful basis for providing such Personal Data to us.

### **4 WHAT TYPE OF INFORMATION IS COLLECTED FROM YOU?**

We only collect Personal Data relevant to the type of transactions you have with RSAcademics. We will initially collect basic information on you such as contact details, job role and experience. If you express an interest in a specific Client or RSAcademics opportunity then we will collect further information from you during your conversations with us. If you apply and are then selected to go through to the next stage, we will then be collecting more information and onwards in that manner.

The categories of Personal Data about you that we may Process include:

- **personal information:** title, surname, forename(s), preferred name, previous surname(s), gender; date of birth, nationality; job title; employer details; department; salary and package; NI number, DfE number, details of any restrictions on working in specified country, passport number (where applicable), visa number (where applicable); work authorisation number (where applicable), driving licence no. (where applicable)
- **contact details:** home address, work address, telephone numbers (home, work, mobile), e-mail addresses (personal, work), Skype address, LinkedIn and other social media profiles
- **education and qualifications:** schools and dates attended, universities and other higher education institutions and dates attended, qualifications and grades
- **employment records:** dates of employment, job titles, locations and descriptions of current and previous positions held; details of current and previous employers; reasons for leaving each employment, gaps in employment, details of any employment disciplinary issues or incidents.
- **referees:** name and contact details of any referees you may provide, explanation of the relationship that you may have and how long you have known each referee
- **Special Categories of Personal Data:** disabilities (so that reasonable adjustments can be made during the selection process)
- **personality testing:** with your explicit consent we may process psychometric assessments, psychological tests, or results from such assessments or tests as part of the selection process
- **background checks:** information revealed by background checks undertaken in accordance with applicable law and subject to your express written consent, including details of past employments, details of residence, credit reference information, and criminal records checks
- **your opinions:** your views on Candidates and Participants where applicable

## 5 HOW IS YOUR PERSONAL DATA USED?

Depending on your interaction with us, the purposes for which your Personal Data may be Processed may include:

- **providing our leadership appointment, training, succession planning, transition management and Leadership Development services to you** – including communicating by phone, text message, letter, email and website forms or by attending meetings with you; and otherwise communicating with you in order to deliver the above services

- **providing leadership appointment, succession planning, transition management and Leadership Development services to our Clients** – including communicating by phone, text message, letter, email and website forms or by attending meetings with them; and otherwise communicating with them in order to deliver the above services
- **mapping the market** – conducting research to enable clients to understand the market. Any personal data we collect will not be passed to Clients without your consent
- **marketing communications** - informing you about news items, career opportunities and other RSAcademics services, events and training courses that you may be interested in via email, telephone, letter, text message, social media, or in person
- **management of our business** – operation and management of our website, communication and IT systems, financial and sales processes record-keeping for health & safety purposes and compliance with our legal obligations, aggregated statistical analysis (we make every effort to ensure no Personal Data is disclosed in the latter)
- **improving our business** – consulting you via email, telephone, online survey, social media, or in person to obtain your views on relevant topics such as improvements to existing services and potential new services
- **thought leadership** - seeking your views or comments by phone, letter, email, surveys, website forms or by attending meetings with you for the purposes of thought leadership research

All Processing is subject to the applicable law as explained in clause 6.

You have the right to object to this processing if you wish, by emailing [dp@rsacademics.co.uk](mailto:dp@rsacademics.co.uk). Please bear in mind that if you object this may affect our ability to carry out tasks above for your benefit.

## **6 WHAT IS THE LAWFUL BASIS FOR PROCESSING YOUR PERSONAL DATA?**

When we collect and Process your personal information in connection with the purposes set out in this privacy notice, we will ensure this is only done in accordance with at least one of the legal grounds available to us under data protection law:

- **legitimate interest** - we have a legitimate interest in carrying out the Processing. Where we rely on this legal basis, our legitimate interests are:
  - the provision of services to you and our Clients (such as finding potential candidates and assessing their suitability for potential roles)
  - the operation and management of our business
  - the promotion of our business
  - the publication of thought leadership research



- **consent** - we have obtained your explicit consent (such as when you choose to apply for an opportunity then this will involve the processing of more detailed personal data including sensitive data such as health information that you or others provide about you)
- **contract** - the Processing is necessary for us to comply with our contractual obligations with you or our Client
- **legal obligation** - the Processing is required by applicable law
- **vital interests** - the Processing is necessary to protect the vital interests of any individual

We only collect or Process Special Categories of Personal Data when:

- we have obtained your explicit consent (as above, this legal basis is not applicable for Processing that is necessary or obligatory in any way)
- the Processing is required by applicable law
- the Processing is necessary for the detection or prevention of crime
- the Processing is necessary for the establishment, exercise or defence of legal rights

## 7 WHO WILL WE SHARE YOUR PERSONAL DATA WITH?

We take technical and organisational steps to ensure that your Personal Data is only shared with Personnel who need to have access to it for the performance of their role. We will also share your data with **our Clients** for the purposes of providing our services to them.

Other scenarios in which we may have to disclose personal data to a third party are limited to:

- **accountants, auditors, lawyers and other outside professional advisors** - subject to binding contractual obligations of confidentiality;
  - **third party Processors** - such as providers of background checking services. These may be located anywhere in the world, subject to binding obligations explained below
  - **legal and regulatory authorities** - upon request, or for the purposes of reporting any actual or suspected breach of applicable law or regulation;
  - **any relevant party, law enforcement agency or court** - to the extent necessary for the establishment, exercise or defence of legal rights;
  - any relevant party for the purposes of prevention, investigation, detection or prosecution of criminal offences or the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security
  - any relevant party in the event where some or all of our assets are acquired by a third party
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- **plugins** - our website may use third party plugins or content (e.g. Facebook, Twitter, and LinkedIn). If you choose to interact with any such

plugins or content, your Personal Data may be shared with the relevant third party

If we engage a third-party Processor to Process your Personal Data, the Processor will be subject to binding contractual obligations to only Process the Personal Data in accordance with our written instructions and take all reasonable measures to protect the confidentiality and security of your Personal Data.

Should a third-party Processor be located outside the EEA, we'll only make a transfer data if adequate levels of protection are in place to protect any information held in that country, or the local service provider complies with applicable privacy laws at all times.

We will not sell or rent your information to third parties. We will not share your information with third parties for marketing purposes.

## **8 HOW LONG DO WE KEEP YOUR PERSONAL DATA?**

We keep your personal data for as long as necessary to provide our services and to fulfil our legal, tax or accounting responsibilities.

You may withdraw your permission at any time by contacting [dp@rsacademics.co.uk](mailto:dp@rsacademics.co.uk).

## **9 TRANSFERRING YOUR INFORMATION OUTSIDE OF EUROPE**

We regularly work with Clients and Personnel permanently or temporarily located in countries outside the European Economic Area ("**EEA**"). For this reason, we may transfer your Personal Data to a country outside the EEA when it is necessary for the performance of a contract and with your consent.

## **10 WHAT ELSE DO I NEED TO KNOW?**

- **data accuracy** - we will endeavour to keep your Personal Data accurate and up-to-date. We rely on you to keep us informed of any changes, or if you find any errors in the Personal Data we hold for you, let us know and we will make the necessary corrections as is soon as reasonably possible and make sure they are conveyed to anyone we may have misinformed
- **data security** - we have taken appropriate organisational and technical measures to protect your Personal Data from unlawful or unauthorised processing, and against the accidental loss of, alteration or damage to, Personal Data stored by us from collection through to destruction. You are responsible for ensuring that any Personal Data you send to us, is done so securely

- **your legal rights** are as follows:
  - **the right to request access** to or a copy of the Personal Data controlled or Processed by us
  - **the right to restrict or object to our Processing activities** of your Personal Data that we control.
  - **the right to request erasure** of Personal Data that we control
  - **the right to request rectification** of any inaccuracies in your Personal Data
  - **the right to port** your Personal Data to another Controller, where applicable
  - **the right to withdraw your Consent**, where we control your Personal data on that basis

We keep lists of people who have objected to Processing or asked for further use of their Personal Data to be restricted or erased, to make sure the restriction is respected in future.

To exercise any of these rights, make your request by emailing [dp@rsacademics.co.uk](mailto:dp@rsacademics.co.uk). In some cases (if your request is particularly complex or repetitive) we may charge you a fee to cover our administrative costs

You also have the right to lodge a complaint regarding the processing of your Personal Data with a supervisory authority such as the Information Commissioner's Office <https://ico.org.uk/concerns/>. This does not affect your statutory rights.

## 11 USE OF 'COOKIES'

Like many other websites, the RSAcademics website uses cookies. 'Cookies' are small pieces of information sent by an organisation to your computer and stored on your hard drive to allow that website to recognise you when you visit. They collect statistical data about your browsing actions and patterns and do not identify you as an individual.

You can disable any cookies already stored on your computer, but these may stop our website from functioning properly. [Click here](#) for information on how to disable cookies.

## 12 REVIEW OF THIS NOTICE

We keep this notice under regular review. It was last updated in June 2019. Should we make any significant amends we will flag this on the home page on our website. Please check this page occasionally to ensure that you're happy with any changes.

Any questions regarding this notice and our privacy practices should be sent by email to [dp@rsacademics.co.uk](mailto:dp@rsacademics.co.uk).