



*Achieving together in faith*

## **Holy Cross Catholic MAC**

### **Privacy Notice: Applicants**

**September 2023 – 2024**

Responsible for Policy	Chris Connoll
Resources Committee Approval Date	18 October 2023
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**Document Control:**

**Version History**

<b>Version</b>	<b>Status</b>	<b>Date</b>	<b>Author</b>	<b>Department</b>	<b>Summary of Changes</b>
1.0	Draft	09/2019	M Alcott	HCCMAC, Central Team	Creation of document from a template
	Draft	02/09/2020		MAC Resources Committee	<b>Approved</b>
2.0	Draft	09/2023	C Connoll	HCCMAC, Central Team	Updates to all sections including tables.
		18/10/2023		MAC Resources Committee	For Approval
2.0	<b>Approved</b>	18/10/2023		MAC Resources Committee	Approved

## Privacy Notice for Applicants

### How we use your information

#### 1. Who are we?

Holy Cross Catholic MAC is the 'data controller'. This means we are responsible for how your personal information is processed and for what purposes. We are the data controller for the following schools within our Multi Academy Company:

- Bishop Ullathorne Catholic School
- Cardinal Newman Catholic School
- Christ the King Catholic Primary School
- St Augustine's Catholic Primary School
- St Elizabeth's Catholic Primary School
- St John Vianney Catholic Primary School
- St Thomas More Catholic Primary School

Holy Cross Catholic MAC is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number **ZA553195**

You can contact Holy Cross Catholic MAC as the Data Controller in writing at:

#### **DPO - Data Controller**

Holy Cross Catholic MAC,  
Heathcote Street,  
Radford,  
CV6 3BL  
Email: [DPO@hcmac.co.uk](mailto:DPO@hcmac.co.uk)  
Tel: 02475 186 555

You can contact Holy Cross Catholic MAC Data Protection Officer in writing at:

#### **School Data Protection Officer**

Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
CV34 4RL  
Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

#### 2. What is a Privacy Notice?

A Privacy Notice sets out to individuals how we use any personal information that we hold about them. We are required to publish this information by data protection legislation. This Privacy Notice explains how we process (collect, store, use and share) personal information about data subjects.

#### 3. What is Personal Information?

Personal information relates to a living individual who can be identified from that information. Identification can be by the information alone or in conjunction with

any other information in the data controller's possession or likely to come into such possession.

'Special category' personal information relates to personal information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation.

#### **4. Policy Statement**

During an individual's time with Holy Cross Multi-Academy Company, we will use information that we gather in relation to them for various purposes. Information that we hold in relation to individuals is known as their "personal data". This will include data that we obtain from the individual directly and data about the individual that we obtain from other people and organisations. We might also need to continue to hold an individual's personal data for a period of time after they have left the school. Anything that we do with an individual's personal data is known as "processing".

This document sets out what personal data we will hold about our data subjects, why we process that data, who we share this information with, and the rights of individuals in relation to their personal data processed by us.

#### **5. What personal information do we process about applicants?**

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

- The information you have provided on your application form, including name, title, address, telephone number, personal email address, date of birth, gender, teacher number, employment history, qualifications, subjects taught and other training and development activities.
- Any test results which arise as part of this application process.
- Information about your current level of remuneration, including benefit entitlements.
- Information provided to us by your referees.
- Gender, ethnicity, and religion

Where you have named referees on your application form, we shall assume that they have consented to being approached by us.

We may also collect, hold and share the following "special categories" of more sensitive personal information:

- information such as gender, age, ethnic group, religious belief, sexual orientation;
- Information about your health, including any medical condition, health and sickness records;  Information about criminal records;
- Information about being barred from working with children or vulnerable people  Any information you provide to us during an interview.

## **6. How is your personal information collected?**

We collect personal information about candidates from the following sources:

- You, the job applicant.
- Disclosure and Barring Service in respect of criminal convictions and information about being barred from working with children or vulnerable people (once a job offer has been made).
- From former employers (once a job offer has been made).

## **7. For what purposes do we use applicants' personal information?**

We will use your personal information to:

- assess your skills, qualifications and suitability for the role
- carry out background checks
- communicate with you about the process
- keep records
- comply with legal or regulatory requirements

We need to process your personal data in order to decide whether to enter into a contract of employment with you. It is ultimately in our legitimate interests to process personal data during the recruitment process and for keeping records of this process. Actively managing this data allows the recruitment process to be efficient and adequately confirm your suitability for the job.

If you fail to provide information when requested, which is necessary for us to consider your application (such as evidence of qualifications or work history), we will not be able to process your application successfully.

Information about your disability status may be used in order to consider where reasonable adjustments need to be made during the recruitment process

Information about your age, gender, race or national or ethnic origin, religious beliefs and sexual orientation will be used to ensure meaningful equal opportunity monitoring and reporting.

## **8. Collecting applicant information**

Whilst the majority of information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the General Data Protection Regulation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

## **9. Who might we share your information with?**

We may share applicant information with members of our staff, directors, and local academy committee representatives who are involved in the recruitment process such as HR and Recruitment Managers who hold vacancies, and other parties such as: -

- The Local Authority
- The Birmingham Diocesan Education Service
- External Consultants involved in our recruitment process as trusted advisors
- Disclosure and Barring Service

Appropriate security measures have been put in place to prevent personal information being accidentally lost, used or accessed in an unauthorised way.

We will not share your data with third parties, unless your application for employment is successful and an offer has been made. They will only process personal information on our instructions and are subject to a duty of confidentiality.

Procedures are also in place deal with suspect data security breaches and you will be notified of a suspected breach where we have a legal obligation to do so.

## **10. What do we do with your information?**

All personal information is held in a manner which is compliant with Data Protection legislation. Personal information is only processed for the purpose it was collected. Holy Cross Catholic MAC monitors the personal information it processes and will only share personal information with a third party if it has a legal basis to do so.

## **11. How long do we keep your information for?**

In retaining personal information, Holy Cross Catholic MAC complies with the Retention Schedules provided by the Information Record Management Society. The schedules set out the Statutory Provisions under which Holy Cross Catholic MAC are required to retain the information

## **12. Transferring data internationally**

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

### 13. What are your rights with respect of your personal information?

Under data protection law, Directors and Local Governing Body Members have the right to request access to information about them that we hold. To make a request for your personal information contact the MAC Data Protection Officer.

#### **DPO - Data Controller**

Holy Cross Catholic MAC,  
Heathcote Street,  
Radford,  
CV6 3BL

Email: [DPO@hcmac.co.uk](mailto:DPO@hcmac.co.uk)

Tel: 02475 186 555

#### **School Data Protection Officer**

Warwickshire Legal Services  
Warwickshire County Council  
Shire Hall  
CV34 4RL

Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)

**\*\*Please ensure you specify which school your request relates to\*\***

You also have the right to:

- object to processing of personal data that is likely to cause, or is causing, damage or distress
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- claim compensation for damages caused by a breach of the Data Protection regulations

### 14. Concerns

If an individual has any concerns about how we are using their personal data then we ask that they contact our Data Protection Officer in the first instance. However an individual can contact the Information Commissioner's Office should they consider this to be necessary, at <https://ico.org.uk/concerns>

### 15. Contact

If you would like to discuss anything in this privacy notice, please contact:

#### **DPO - Data Controller**

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**Table 1 – Personal information we are required to process to comply with the law:**

<b>Information Type</b>	<b>Relevant legislation</b>	<b>Special Category–additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
<b>Name</b>	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
<b>Address</b>	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
<b>Date of Birth</b>	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
<b>Nationality</b>	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
<b>Occupation</b>	Companies Act 2006		Companies House	Statutory Requirement



**Table 2 – Personal information we are required to process as it is necessary to protect someone’s vital interests**

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Medical Information	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics / ambulance	Vital Interest
Religious belief	Necessary to protect vital interests of the data subject or another person where the data subject is physically or legally incapable of giving consent	Medical staff i.e. paramedics / ambulance	Vital Interest



**Table 3 - Personal information we are required to process with the consent of the individual to whom that information 'belongs'**

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Consent Requirement</b>
Picture Profile		Public record on website	Consent of individual



**Table 4 - Personal information we are required to process because it is necessary to do so in order to perform a public task**

<b>Information Type</b>	<b>Special Category - additional lawful reason</b>	<b>Third Parties with whom we share the information</b>	<b>Lawful reason for sharing</b>
Name		Local Authorities, The Department for Education, Companies House, Education and Skills Funding Agency (ESFA), OFSTED, The Birmingham Diocesan Education Service, Lloyds Bank, Parents/Guardians Selected and approved third parties.	Legal Obligation and Public Task
Personal Information (Address, Contact Information, Date of Birth)		Local Authorities, The Department for Education (DfE), Companies House, Microsoft	Legal Obligation
Record of Business Interests			Legal Obligation
Skills Audit			Public Task
Disclosure and Barring Service Certificate number and start date			Public Task