



Achieving together in faith

Holy Cross Catholic MAC

Privacy Notice: Workforce

2025 – 2026

Responsible for Policy	Chris Connoll
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Document Control:

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Version	Status	Date	Author	Department	Summary of Changes
1.0	Draft	09/2019	M Alcott	HCCMAC, Central Team	Creation of document from a template
	Draft	02/09/2020		MAC Resources Committee	Approved
2.0	Draft	09/2023	C Connoll	HCCMAC, Central Team	Updates to all sections including tables.
		18/10/2023		MAC Resources Committee	For Approval
2.1	Draft	08/2024	C Connoll	HCCMAC, Central Team	No Updates
				MAC Resources Committee	For Approval
2.1	Approved	16/10/2024		MAC Resources Committee	No Change
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Workforce Privacy Notice

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
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

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 information do we process in relation to our workforce?

We will collect, hold, share or otherwise use the following information about our workforce:

- personal information (such as name, address, home and mobile numbers, personal email address, employee or teacher number, national insurance number, and emergency contact details)
- contract information (such as start dates, hours worked, post, roles and salary information, bank/building society details)
- work absence information (such as number of absences and reasons (including information regarding physical and/or mental health), holiday records)
- qualifications / training courses attended and, where relevant, subjects taught (such as training record)
- performance information (such as appraisals and performance reviews, performance measures including performance management/improvement plans, disciplinary or grievance records)
- other information (such as pension arrangements (and all information included in these necessary to administer them), time and attendance records, information in applications made for other posts within the school, criminal records information (including the results of Disclosure and Barring Service (DBS) checks), details in references received or provided to other organisations, CCTV footage and images)

We will also use special categories of data including such as gender, age, ethnic group, sex or sexual orientation, religious or similar beliefs, political opinions, trade union membership, information about health, genetic information and biometric data. These types of personal data are subject to additional requirements.

6. For what purposes do we use personal information?

We use workforce data to:

- Develop a comprehensive picture of the workforce and how it is deployed
- Inform the development of recruitment and retention policies
- Enable individuals to be paid and receive other staff benefits
- Ensure that we can act in an emergency
- Facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- Support effective performance management
- Allow better financial modelling and planning
- Enable equalities monitoring
- Improve the management of workforce data across the sector
- Support the work of the School Teachers' Review Body
- To fulfil our statutory obligations

7. Where do we get information from about our workforce?

A lot of the information we have about our workforce comes from the individuals themselves. However, we may also obtain information from tax and regulatory authorities such as HMRC, previous employers, your trade union, the DBS, our insurance benefit administrators, consultants and other professionals we may engage, recruitment or vetting agencies, other members of staff, students or their parents, and publicly available resources including online sources. In addition, we may obtain information from automated monitoring of our websites and other technical systems such as our computer networks and systems, CCTV and access control systems, communications systems, remote access systems, email and instant messaging systems, intranet and internet facilities, telephones, voicemail and mobile phone records.

8. Why do we use this information?

We will process the personal data of our workforce for the following reasons:

- a. Where we are required by law, including:
 - To comply with the law regarding data sharing (see further below)
 - To comply with specific employment law requirements, including our obligations as an employer under employment protection and health and safety legislation, and under statutory codes of practice such as those issued by ACAS
 - To comply with legal requirements in relation to equality and non-discrimination
- b. Where we are required by any contract with our workforce, such as employment contracts, including:
 - To make payments to our workforce, such as salary payments
 - To deduct tax and National Insurance contributions
 - To make a decision about recruitment

- To check individuals are legally entitled to work in the UK
 - Administering employment contracts
 - Conducting performance reviews
 - Making decisions about salary and compensation
 - Liaising with pension providers
 - Providing the following benefits:
 - Childcare Voucher Scheme
 - Cycle to Work Scheme
- c. Where the law otherwise allows us to process the personal data, or we are carrying out a task in the public interest, including:
- To enable the development of a comprehensive picture of the workforce and how it is deployed
 - To inform the development of recruitment and retention policies
 - To safeguard our pupils and other individuals
 - To ensure safe working practices
 - In the interests of ensuring equal opportunities and treatment
- d. Where we otherwise have the consent of the individual

Whilst the majority of processing of personal data of our workforce will not require consent, we will inform individuals if their consent is required and seek that consent before any processing takes place. Due to the imbalance of power in an employee to employer relationship, it is generally thought that although consent may be implied it cannot truly be freely given. So consent is not necessarily the most appropriate basis to rely upon as an employer.

9. Why do we use special category personal data?

We may process special category personal data of our workforce for the following reasons:

- To carry out our legal obligations in relation to employment law, where this is in accordance with our Data Protection Policy
- Where the processing is necessary for reasons of substantial public interest, including for purposes of equality of opportunity and treatment, where this is in accordance with our Data Protection Policy.
- For the purposes of preventative or occupational medicine in order to assess an individual's working capacity and/ or the need for reasonable adjustments.
- Where we otherwise have an individual's explicit written consent – subject to the restriction set out above on the use of consent in an employment relationship.

There may also be circumstances where we need to use your information in relation to legal claims, or to protect your vital interests and where you are unable to provide your consent.

10. Failure to provide this information

If our workforce fail to provide information to us then this may result in us being unable to perform the employment contract, or we may be prevented from complying with our legal obligations.

11. How long will we hold information in relation to our workforce?

We will hold information relating to our workforce only for as long as necessary. How long we need to hold on to any information will depend on the type of information. For further detail, please see our Data Retention Policy.

12. Who will we share information with about our workforce?

We routinely share information about our workforce with:

- Local authorities, to assist them in the exercise of their responsibilities in relation to education and training, youth support and safeguarding purposes
- The Department for Education, Education and Skills Funding Agency, in compliance with legal obligations of the school to provide information about our workforce as part of statutory data collections
- Contractors, such as payroll providers, to enable them to provide an effective service to the school and government agencies such as HMRC and DWP regarding tax payments and benefits
- Our professional advisors including legal and HR consultants
- Birmingham Diocese Education Service.

The Department for Education may share information that we are required to provide to them with other organisations. For further information about the Department's data-sharing process, please visit: <https://www.gov.uk/guidance/data-protection-how-we-collect-andshare-research-data>.

Contact details for the Department can be found at <https://www.gov.uk/contact-dfe>.

13. Rights of our workforce in relation to their personal data

All of our workforce has the right to request access to personal data that we hold about them. To make a request for access to their personal data, individuals should contact:

DPO - Data Controller

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

Please also refer to our Data Protection Policy for further details on requesting access to workforce information.

Individuals also have the right, in certain circumstances, to:

- Object to the processing of their personal data
- Have inaccurate or incomplete personal data about them rectified
- Restrict processing of their personal data

- Object to the making of decisions about them taken by automated means
- Have your data transferred to another organisation
- Claim compensation for damage caused by a breach of their data protection rights

If an individual wants to exercise any of these rights then they should contact:

DPO - Data Controller

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

The law does not oblige schools to comply with all requests. If a school does not intend to comply with the request then the individual will be notified of the reasons why in writing.

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

Holy Cross Catholic MAC,
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Radford,
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CV34 4RL
Email: schooldpo@warwickshire.gov.uk

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

Information Type	Relevant legislation	Special Category– additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Staff information, including personal details, N.I number, DBS checks, qualifications, verification of right to work in the U.K	Education Act 2005, Section 114 and accompanying regulations		Secretary of State, Coventry City Council, Disclosure & Barring Service, Birmingham Diocesan Education Service (BDES)	Legal Obligation
School workforce Census including staff personal details	Education Act 2005, Section 114 and accompanying regulations		Department of Education	Legal Obligation
School workforce Census – Staff Ethnicity	Education Act 2005, Section 114 and accompanying regulations	Consent	Department of Education	Legal Obligation
Accident Records	Reporting of Injuries, Diseases & Dangerous Occurrences Regulations 2013 (RIDDOR)		Health & Safety Executive, and Local Authority Health & Safety team (where necessary)	Legal Obligation
Individual Staff Health & Safety Risk Assessments and Personal Emergency Evacuation Plans (PEEP)	Health and Safety at Work etc Act 1974 and accompanying legislation		Not shared externally	
Qualifying Complaint Information	Education Act 2005, Section 11B		Chief Inspector	Legal Obligation
Verification of Right to work in the U.K (Single Central Record)	Immigration, Asylum and Nationality Act 2006, Section 15		Local Authority, Ofsted	Legal Obligation

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

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
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 OR Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	Vital Interest
Staff Dietary Requirements (food allergies)	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance	Vital Interest
Medical Conditions & Staff Emergency Contact Details	Necessary for preventative/ occupational medicine	Medical staff i.e. paramedics/ambulance Responsible/First aid trained staff on residential trips	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'

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Photographs	Local Press/Media, Staff Medical Noticeboard, Parents & Community (Newsletter, School Website, X (formerly Twitter), Annual Prospectus, Internal school displays, staff photo board). MAC Authorised publications	Consent
Staff Work Email address and mobile number	Parents, and other members of staff	Public Task

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

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Attendance Records at staff meetings and staff training		Not shared externally	Public Task
Staff personal characteristics i.e Religion/Gender/Ethnicity	Consent	Local Authority – Confidential Recruitment Monitoring, Birmingham Diocesan Education Service annual census	Public Task & Statistical Purposes
Medical Conditions (including allergies)	Necessary for preventive or occupational medicine.	Medical staff i.e. paramedics/ambulance,	Vital Interests

Table 5 Personal information we are required to process because of a contract we have with you or because you have asked us to take specific steps before entering into a contract

Information Type	Third Parties with whom we share the information	Lawful reason for sharing
Recruitment Information – Application forms, interview notes, Medical questionnaires & references	Local Authority & Ofsted	Public Task / Legal Obligation
Absence Records (including number of absences, reasons for absence & self-certifications forms)	DataPlan Stone King SamPeople	Contract
Disciplinary action taken	DataPlan Stone King SamPeople	Contract
Grievances	DataPlan Stone King SamPeople	Contract
Staff Information i.e name D.O.B, address, contact details, Emergency contact details	Department of Education – school workforce census.	Legal Obligation
P45 Forms	DataPlan Stone King SamPeople	Contract
Consent Forms i.e GDPR, Policy Agreement	Not shared externally	
Staff personal bank details	DataPlan Stone King SamPeople	Contract
Appraisal Records, appraisal notes, feedback from colleagues, objectives, updated job descriptions, pay & promotion recommendations	DataPlan Stone King SamPeople	Contract
Staff information, including personal details, N.I number, DBS, Address, Phone number.	Secretary of State, Coventry City Council, Disclosure & Barring Service, DataPlan, Stone King, SamPeople	Legal Obligation

Table 6 Personal information we process because we have a legitimate interest.

Information Type	Special Category - additional lawful reason	Third Parties with whom we share the information	Lawful reason for sharing
Images captured on our CCTV system	n/a	This is not shared routinely	n/a