



EMMAUS CATHOLIC MAC

Recruitment Privacy Notice

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Post holder responsible	Chief Finance and Operations Officer



Commitment to Equality:

We are committed to providing a positive working environment which is free from prejudice and unlawful discrimination and any form of harassment, bullying or victimisation. We have developed a number of key policies to ensure that the principles of Catholic Social Teaching in relation to human dignity and dignity in work become embedded into every aspect of school life and these policies are reviewed regularly in this regard.

This Recruitment Privacy Notice has been approved and adopted by Emmaus Catholic Multi Academy Company on 20.05.25 and will be reviewed in April 2027.

Signed by Director of Emmaus Catholic MAC:

Signed by CEO for Central Team:

This Policy relates to all Emmaus Schools.

Contents

1	How we use information in the process of recruitment	4
2	The categories of recruitment information	4
3	Why we collect and use recruitment information	5
4	The lawful basis on which we process this information	6
5	Collecting recruitment information	7
6	Will your personal data be sought from third parties	7
7	Storing this information	8
8	Who we share this information with	8
9	Why we share information	9
10	Requesting access to your information	10
11	How to find out what personal information the Dfe hold about you	11

DEFINITIONS

The Company's standard set of definitions is contained at [Definition of Terms](#) – please refer to this for the latest definitions.

1. How we use information in the process of recruitment

- 1.1 Emmaus Catholic Multi Academy Company ('The MAC') collects and processes personal data as part of our recruitment process.
- 1.2 The MAC will gather and use information relating to the candidate.
- 1.3 Information that the MAC holds in relation to individuals is known as their "personal data". We will process your personal data during your application process for the purpose of complying with legal obligations, carrying out tasks which are in the public interest, and taking steps with a view to entering into an employment contract with you. This includes:
 - to assess your suitability for the role you are applying for;
 - to take steps to enter into a contract with you;
 - to check that you are eligible to work in the United Kingdom or that you are not prohibited from teaching; and
 - so that we are able to monitor applications for posts in The MAC central office and individual schools to ensure that we are fulfilling our obligations under the public sector equality duty under the Equality Act 2010.
- 1.4 This will include data that the MAC obtain from the candidate directly and data about the candidate obtained from other people and organisations. The MAC might also need to continue to hold an individual's personal data for a period of time after the recruitment process, even if unsuccessful.
- 1.5 The MAC is committed to being transparent about how it collects and uses the data and to meeting its data protection obligations. This privacy notice will inform you about why the MAC collects and processes a range of information about you in respects of its recruitment process.

2. The categories of recruitment information that we collect, process, hold and share include:

- 2.1 Candidates
 - personal information (such as name, address and contact details, employee or teacher number, details of your bank, national insurance number, information about your marital status, next of kin, dependants and emergency contacts)
 - special categories of data including characteristics information (such as gender, age, ethnic group)

- contract information (such as start dates, terms and conditions of your employment, hours worked, post, roles and salary information, information about entitlement to benefits such as pensions, information about your nationality and the entitlement to work in the UK)
- work absence information (such as number of absences and reasons)
- qualifications (such as skills, experience and employment history, where relevant, subjects taught)
- membership of professional bodies
- details of driving licence (if relevant to the role)
- Information about your criminal record.
- details of any disciplinary or grievance procedures in which you have been involved (such as any warnings issued to you and related correspondence)
- assessments of your performance (such as appraisals, performance reviews and ratings, performance improvement plans and related correspondence)
- information about medical or health conditions (such as whether or not you have a disability for which the organisation needs to make reasonable adjustments)
- whether you are related to any member of our workforce in the MAC.
- details of any support or assistance you may need to assist you at the interview because of a disability.

2.2 Recruitment

- last application date
- action taken date
- application notes
- candidate current job details
- application URL
- candidate status history and dates
- reason for rejection
- outcome information related to interviews (including feedback and resulting recommendations)
- and other general candidate feedback.
- results from any recruitment tests specific to the role applied for

3. Why we collect and use recruitment information

- 3.1 The MAC collects and processes personal data relating to its prospective employees to ensure the school's safeguarding and safer recruitment protocols are upheld.

3.2 The MAC process personal data to meet the requirements set out in UK employment and childcare law, including those in relation to the following:

- Safeguarding Vulnerable Groups Act 2006
- The Childcare (Disqualification) Regulations 2018
- Keeping Children Safe in Education 2023
- Working Together to Safeguard Children 2018

3.3 The information collected also:

- enables individuals to be paid
- informs the development of recruitment and retention policies
- provides an accurate and up-to-date employment record with contact details (including details of who to contact in the event of an emergency)
- ensures that The MAC complies with duties in relation to individuals with disabilities, meeting its obligations under health and safety law, and ensuring that employees are receiving the pay or other benefits to which they are entitled.
- ensures effective general HR and business administration
- maintains and promotes equality in the workplace
- enables the development of a comprehensive picture of the workforce and how it is deployed
- improves the management of workforce data across the sector
- allows better financial modelling and planning.

3.4 Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities).

4. The lawful basis on which we process this information

4.1 We process this information under the following UK General Data Protection Articles:

- 6.1(b) Processing is necessary for a contract you have with the individual, or because they have asked you to take specific steps before entering into a contract.
- 6.1(c) Processing is necessary for compliance with a legal obligation to which the controller is subject (for example The Health and Safety at Work Act, Equality Act 2010, The Disability Discrimination Act).
- 6.1(e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested

in the controller (for example The Education Act requires the collection of workforce data for the purpose of Departmental Census. Working together to Safeguard Children Guidelines (DfE)).

- 9.2 (b) processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by domestic law or a collective agreement pursuant to domestic law providing for appropriate safeguards for the fundamental rights and the interests of the data subject.

5. Collecting recruitment information

- 5.1 The MAC collects personal information in a variety of ways. For example, data is collected through application forms, information is obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of employment; from correspondence with you; or through interviews, meetings or other assessment. These collection methods include paper copy application forms and online / website portals such as our website or our recruitment portal.

6. Will your personal data be sought from third parties

- 6.1 The MAC collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from criminal records checks permitted by law (such as Disclosure and Barring Service (DBS)).
- 6.2 Personal data is only sought from the data subject. No third parties will be contacted to obtain personal data pertaining to prospective members of staff without the data subject's consent.
- 6.3 Prospective staff members' personal data may be obtained and processed from third parties where the law requires the school to do so, e.g. medical records from a GP. The categories of data obtained and processed from third parties include:
- Medical Records / Occupational Health Assessment
 - References including Priest references
 - DBS – Criminal Records

6.4 Where data is obtained from third parties, the personal data originates from the following sources:

- Local GP - medical check to indicate fitness to work
- Disclosure and Barring Service – regarding your criminal record, in criminal records certificates (CRCs) and enhanced criminal records certificates (ECRCs), whether you are barred from working in regulated activity
- Previous Employers – including details of any conduct, grievance or performance issues, appraisals, time and attendance, from references obtained about you from previous employers and/or education providers
- Home Office – immigration status and information from related documents, such as your passport or other identification and immigration information
- National College of Teaching and Leadership (NCTL) – (if you are a teacher, The MAC will check the NCTL Teachers Services about your teacher status, whether you are subject to a prohibition from teaching order and any other relevant checks (for example Section 128 direction for management posts and EEA teacher sanctions)

7. Storing this information

- 7.1 We hold data securely for the set amount of time shown in our data retention schedule.
- 7.2 If you are successful then how long we need to hold on to any information will depend on the type of information.
- 7.3 For more information on our data retention schedule and how we keep your data safe, please refer to the school's data retention policy.
- 7.4 If you are unsuccessful, we will hold your personal data only for six months, after which time it is securely deleted.

8. Who we share this information with

- 8.1 Your information may be shared internally, including with those people responsible for HR and recruitment (including payroll), senior staff who you report to or who have supervisory/management responsibilities for you and business support and IT staff if access to the data is necessary for performance of their roles.

8.2 If you are employed by the MAC to work in the Central Team, the information we collect may be included on our Single Central Record and the individual school's Single Central Record. If you are employed by the MAC to work within school/s, the information we collect will be included on the school Single Central Record in school. In these scenarios, the school's Privacy Notice (Workforce) in relation to data we collect, process, hold and share about you during your time with us, will be available on the MAC policy database for you to access.

8.3 The MAC routinely shares this information with:

- the relevant Local Authority, Birmingham, Dudley, Sandwell and Worcester.
- the DfE
- the Birmingham Catholic Diocese (role specific)
- the MAC auditors – both internal and external auditors pick samples of recruitment and HR files to audit the accuracy and policy alignment across schools
- Ofsted – in the capacity of Single Central Record safeguarding checks
- the MAC Safeguarding auditor
- the MAC external HR consultant
- the MAC IT external consultant

9. Why we share information

9.1 We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.

9.2 **Local Authority** - We are required to share information about our workforce members with our local authority (LA) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

9.3 **The DfE** - We are required to share information about our school employees with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments.

9.4 All data is transferred securely and held by DfE under a combination of software and hardware controls which meet the current government security policy framework.

9.5 For more information, please see 'How Government uses your data' section.

- 9.6 For privacy information on the data the Department for Education (DfE) collects and uses, please see: <https://www.gov.uk/government/publications/privacy-information-education-providers-workforce-including-teachers>.

10. Requesting access to your information

- 10.1 Under data protection legislation, you have the right to request access to information about you that we hold. To make a request for your personal information, contact the School Principal or the Chief Finance and Operations Officer. The MAC purchases the 'YourIG Data Protection Officer Service' from Dudley MBC for our DPO. They can be contacted on:

- YourIG Data Protection Officer Service
Dudley MBC
The Council House
Dudley
West Midlands
DY1 1HF

Email: YourIGDPOService@dudley.gov.uk

Tel: 01384 815607

- 10.2 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

- 10.3 If you have a concern about the way we are collecting or using your personal data, we ask that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

11. How to find out what personal information the Dfe hold about you

11.1 Under the terms of the UK Data Protection Act 2018, you're entitled to ask the Department:

- if they are processing your personal data
- for a description of the data they hold about you
- the reasons they're holding it and any recipient it may be disclosed to
- for a copy of your personal data and any details of its source

11.2 If you want to see the personal data held about you by the Department, you should make a 'subject access request'. Further information on how to do this can be found within the Department's personal information charter that is published at the address below:

<https://www.gov.uk/government/organisations/department-for-education/about/personal-information-charter>

To contact the department: <https://www.gov.uk/contact-dfe>