



EMMAUS CATHOLIC MAC

Workforce Privacy Notice

| | |
|--------------------------------|--------------------------------------|
| Version | 1.0 |
| Date created/updated | 31.03.25 |
| Ratified by | Compliance |
| Date ratified | 20.05.25 |
| Date issued | 21.05.25 |
| Policy review date | 01.04.27 |
| 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 Workforce 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 workforce information | 4 |
| 2 | The categories of workforce information | 4 |
| 3 | Why we collect and use workforce information | 5 |
| 4 | The lawful basis on which we process this information | 6 |
| 5 | Collecting workforce information | 6 |
| 6 | Storing the information | 7 |
| 7 | Who we share this information with | 7 |
| 8 | Why we share this information | 8 |
| 9 | Requesting access to your information | 8 |
| 10 | How to find out what personal information the Government hold about you | 9 |

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 workforce information

1.1 Emmaus Catholic Multi Academy Company (the MAC) collects and processes personal data relating to its employees to manage the employment relationship. 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.

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

2.1 Workforce

- 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)
- 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)

3. Why we collect and use workforce information

3.1 We use workforce data to:

- enable the development of a comprehensive picture of the workforce and how it is deployed
- inform the development of recruitment and retention policies
- enable individuals to be paid
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights.
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace.
- operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes.
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled.
- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the [Name of school/setting] complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled
- ensure effective general HR and business administration
- provide references on request for current or former employees
- respond to and defend against legal claims
- maintain and promote equality in the workplace.

3.2 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 workforce information

5.1 The MAC collects personal information in a variety of ways. For example, data might be collected through application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessment.

5.2 In some cases, the MAC may collect personal data about you from third parties, such as references supplied by former employers, priest references where applicable, information from employment background check providers, information from credit reference agencies and information from criminal records checks permitted by law.

5.3 Workforce data is essential for the MAC / individual school's operational use. Whilst the majority of personal information you provide to us is mandatory, some of it is requested on a voluntary basis. In order to comply with data protection legislation, we will inform you at the point of collection, whether you are required to provide certain information to us or if you have a choice in this

and we will tell you what you need to do if you do not want to share this information with us.

6. Storing this information

- 6.1 We hold data securely for the set amount of time shown in our data retention schedule.
- 6.2 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. Who we share this information with

- 7.1 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.
- 7.2 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.
- 7.3 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

8. Why we share information

- 8.1 We do not share information about workforce members with anyone without consent unless the law and our policies allow us to do so.
- 8.2 **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.
- 8.3 **The DfE** - We are required to share information about our employees with the (DfE) under section 5 of the Education (Supply of Information about the School Workforce) (England) Regulations 2007 and amendments. The Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.
- 8.4 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.
- 8.5 For more information, please see 'How Government uses your data' section.
- 8.6 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>.

9. Requesting access to your information

- 9.1 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

9.2 Where we are processing your personal data with your consent, you have the right to withdraw that consent. If you change your mind, or you are unhappy with our use of your personal data, please let us know by contacting your school DPO or the Chief Finance and Operations Officer (MAC DPO)

9.3 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

9.4 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/>

10. How to find out what personal information the Government hold about you

10.1 The workforce data that we lawfully share with the DfE through data collections:

- informs departmental policy on pay and the monitoring of the effectiveness and diversity of the school workforce
- links to school funding and expenditure
- supports 'longer term' research and monitoring of educational policy

10.2 To find out more about the data collection requirements placed on us by the Department for Education including the data that we share with them, go to <https://www.gov.uk/education/data-collection-and-censuses-for-schools>

10.3 The Department may share information about school employees with third parties who promote the education or well-being of children or the effective deployment of school staff in England by:

- conducting research or analysis
- producing statistics
- providing information, advice or guidance

10.4 The Department has robust processes in place to ensure that the confidentiality of personal data is maintained and there are stringent controls in place regarding access to it and its use. Decisions on whether DfE releases personal data to third parties are subject to a strict approval process and based on a detailed assessment of:

- who is requesting the data
- the purpose for which it is required
- the level and sensitivity of data requested; and
- the arrangements in place to securely store and handle the data

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

- 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

10.6 To be granted access to school workforce information, organisations must comply with its strict terms and conditions covering the confidentiality and handling of the data, security arrangements and retention and use of the data.

10.7 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>

For more information about the Department for Education's (DfE) data sharing process, please visit: <https://www.gov.uk/data-protection-how-we-collect-and-share-research-data>



Our journey with Christ

For information about which organisations the Department for Education (DfE) has provided information, (and for which project) please visit the following website: <https://www.gov.uk/government/publications/dfe-external-data-shares>