



*Achieving together in faith*

## **Holy Cross Catholic MAC**

### **Privacy Notice: Directors and Local Governing Body Members**

**September 2023 – 2024**

Responsible for Policy	Chris Connoll
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**Document Control:**

**Version History**

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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 Directors and Local Governing Body Members

## 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 Directors and Local Governing Body Members?**

The categories of Directors and Local Governing Body Members' information that we collect, hold and share include:

- personal information such as name, any former names, address, date of birth, occupation nationality, telephone and email contact details,
- Records of Business Interest
- Disclosure and Barring Service Certificate number and start date
- Self-assessment skills audit
- Personal profiles provided for MAC/School website

#### **6. For what purposes do we use personal information?**

We use Directors and Local Governing Body Members data to:

- Fulfil statutory obligations.
- Communicate relevant information to individuals or groups or Boards or Local Governing Body Committees for the purpose of them carrying out their roles and responsibilities as a Director or Local Governing Body Members.

#### **7. Collecting Director and Local Governing Body Member information**

Whilst the majority of Director and Local Governing Body Member 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 Director or Local Governing Body Member information to us or if you have a choice in this.

## **8. What are the legal reasons for us to process your personal information?**

We are required to process personal information in accordance with data protection legislation and only do so when the law allows us to. Data Protection law sets out the lawful reasons we have to process your personal information and these are as follows:

### **a. To comply with the law**

We collect and use general purpose staff information to meet certain legal requirements and legal obligations placed upon the school by UK law. We therefore have the right to process your personal information for such purposes without the need to obtain your consent.

Details of the type of processing that we must undertake, the personal data that is processed, the legislation which requires us to do so and who we may share this information with is set out in Table 1.

### **b. To protect someone's vital interests**

We are able to process personal information when there is an emergency and/or where a person's life is in danger.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 2.

### **c. With the consent of the individual to whom that information 'belongs'**

Whilst much of the personal information is processed in accordance with a legal requirement, there is some personal information that we can only process when we have your consent to do so. In these circumstances, we will provide you with specific and explicit information regarding the reasons the data is being collected and how the data will be used.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 3.

### **d. To perform a public task**

It is a day-to-day function of Holy Cross Catholic MAC to ensure that Directors and Local Governing Body Members receive the training and support they require. Much of this work is not set out directly in any legislation but it is deemed to be necessary in order to ensure that Directors and Local Governing Body Members are properly supported and able to fulfil their roles and responsibilities.

Details of the type of processing that we may undertake on this basis and who we may share that information is set out in Table 4.

## **9. Special category personal information**

In order to process 'special category' data, we must be able to demonstrate how the law allows us to do so. In addition to the lawful reasons above, we must also be satisfied that ONE of the following additional lawful reasons applies:

- a. Explicit consent of the data subject
- b. Necessary for carrying out obligations and exercising specific rights in relation to employment and social security and social protection law
- c. Processing relates to personal data which is manifestly made public by the data subject
- d. Necessary for establishing, exercising or defending legal claims
- e. Necessary for reasons of substantial public interest
- f. Necessary for preventive or occupational medicine, or for reasons of public interest in the area of public health
- g. Necessary for archiving, historical research or statistical purposes in the public interest

The lawful reasons for each type of sensitive category personal information that we process is set out in the tables attached.

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

We routinely share Director/Local Governing Body Member information with:

- a. Local Authorities
- b. The Department for Education (DfE)
- c. Disclosure and Barring Service
- d. Companies House
- e. Education and Skills Funding Agency
- f. Office for Standards in Education, Children's Services and Skills
- g. The Birmingham Diocesan Education Service
- h. IRIS Financials
- i. Lloyds Bank
- j. Microsoft
- k. Parents/Guardians
- l. The public (Website)

We do not share information about our Directors and Local Governing Body Members unless the law and/or consent as outlined in our policies.

Please refer to the tables for information about what personal information is shared with which specific third parties.

## **11. 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 (as set out above).

## **12. 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

## **13. 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.

## **14. 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

## 15. 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>

## 16. Contact

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

**DPO - Data Controller**

Holy Cross Catholic MAC,  
Heathcote Street,  
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CV6 3BL  
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Email: [schooldpo@warwickshire.gov.uk](mailto:schooldpo@warwickshire.gov.uk)



**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>
Name	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
Address	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
Date of Birth	Companies Act 2006 & Academies Act 2010		Companies House DfE Disclosure and Barring Service	Statutory Requirement
Nationality	Companies Act 2006 & Academies Act 2010		Companies House DfE	Statutory Requirement
Occupation	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