



**The Romero
Catholic Academy**
Nurturing the Talent of Tomorrow



Privacy Notice Applicants

Responsible for policy:

Policy status:

Policy review:

Chair of Directors:

**CC2 Strategy, People and Organisational Development
Compliance**

Annually

Sandra Fawcett

Contents

Definitions.....	3
1. Introduction	4
2. What is a Privacy Notice?	4
3. What is Personal Information?.....	4
4. What personal information do we process ?	4
5. Why do we use your personal information?.....	5
6. What are our legal bases for processing your data?	5
7. Who do we share your information with?.....	6
8. International data transfers.....	6
9. How long do we keep your information?	7
10. Your rights.....	7
11. Complaints	7
12. Data Security	8
13. Links with other policies.....	8
14. Monitoring and Review	8

Definitions

In this **Applicants Privacy Notice**, unless the context otherwise requires, the following expressions shall have the following meanings:

- i **'The Romero Catholic Academy'** means the Company named at the beginning of this **Parents and Pupils Privacy Notice** and includes all sites upon which the Company is undertaking, from time to time, being carried out. The Romero Catholic Academy includes; **Corpus Christi, Good Shepherd, Sacred Heart, SS Peter and Paul, St Gregory, St John Fisher, St Patrick, Cardinal Wiseman, Shared Services Team.**
- ii **'Romero Catholic Academy'** means the Company responsible for the management of the Academy and, for all purposes, means the employer of staff at the Company.
- iii **'Board'** means the board of Directors of the Romero Catholic Academy.
- iv **'Chair'** means the Chair of the Board or the Chair of the Local Governing Body of the Academy appointed from time to time, as appropriate.
- v **'Governance Professional'** means the Governance Professional to the Board or the Governance Professional to the Local Governing Body of the Academy appointed from time to time, as appropriate.
- vi **'Chief Executive Officer or CEO'** means the person responsible for performance of all Academies and Staff within the Multi Academy Company and is accountable to the Board of Directors.
- vii **'Diocesan Schools Commission'** means the education service provided by the diocese, which may also be known, or referred to, as the Birmingham Diocesan Education Service.
- viii **'Local Governing Body'** means the Governing Body of the School.
- ix **'Governing Body Representatives'** means the governors appointed and elected to the Local Governing Body of the School, from time to time.
- x **'Principal'** means the substantive Principal, who is the person with overall responsibility for the day to day management of the school.
- xi **'School'** means the school or college within The Romero Catholic Academy and includes all sites upon which the school undertaking is, from time to time, being carried out.
- xii **'Shared Services Team'** means the staff who work in the central team across the Company (e.g. HR/ Finance)
- xiii **'Vice-Chair'** means the Vice-Chair of the Governing Body elected from time to time.
- xiv **'School DPO'** means the Data Protection Officer responsible for all schools within The Romero Catholic Academy (Warwickshire Legal Services)

1. Introduction

The Romero Catholic Academy is the **data controller** for the purposes of UK data protection law. This means we are responsible for how your personal information is collected, used and stored when you apply for a role with us.

The Romero Catholic Academy is registered as the Data Controller with the Information Commissioner's Office (ICO); Registration Number: ZA137894.

You can contact The Romero Catholic Academy as the Data Controller in writing at:

Data Protection Officer

C/O Cardinal Wiseman Catholic School

Potters Green Road

Coventry

CV2 2AJ

or admin@romeromac.com

2. What is a Privacy Notice?

A Privacy Notice explains how we collect, use, store and share your personal information, and your rights under UK data protection law.

3. What is Personal Information?

Personal information is any data that identifies you, directly or indirectly.

Special category data includes more sensitive information such as:

- health information
- ethnicity
- religious beliefs
- trade union membership

We may also process **criminal offence data**, such as Disclosure and Barring Service (DBS) information, where required.

4. What personal information do we process ?

We collect and process the following information during recruitment:

- **Personal data**
 - Name, address and contact details
 - Date of birth
 - National Insurance number (where required)

- **Recruitment data**
 - Application form and CV
 - Employment history and qualifications
 - References
 - Interview notes and assessment outcomes
- **Compliance data**
 - Right to work documentation
 - Identity checks
- **Special category data**
 - Equal opportunities monitoring information (e.g. ethnicity, gender)
 - Health information (e.g. for reasonable adjustments)
- **Criminal offence data**
 - DBS and safeguarding checks (for relevant roles)

Sources of Personal Information

We obtain personal information from:

- Application forms and CVs submitted by applicants
- Recruitment agencies
- References provided by previous employers
- Professional qualification verification providers
- The Disclosure and Barring Service
- Publicly available professional profiles where relevant to recruitment

5. Why do we use your personal information?

We use your data to:

- Assess your suitability for employment
- Carry out recruitment and selection processes
- Verify your identity and qualifications
- Ensure safe recruitment and safeguarding of children
- Meet legal and regulatory requirements
- Maintain appropriate records of recruitment activity

Certain roles require enhanced vetting, including enhanced DBS checks, barred list checks, prohibition checks and other safeguarding checks required under Keeping Children Safe in Education (KCSIE).

This aligns the notice more closely with recruitment practice in schools.

6. What are our legal bases for processing your data?

Our legitimate interests include administering recruitment processes efficiently, assessing candidate suitability, maintaining recruitment records, defending potential legal claims and improving recruitment practices.

We only process personal data when permitted by law.

Lawful bases under UK GDPR (Article 6)

We rely on:

- **Legal obligation** – to comply with safeguarding, employment and education law
- **Contract** – to take steps before entering into an employment contract
- **Public task** – to carry out education functions
- **Legitimate interests** – to manage recruitment effectively (balanced against your rights)

Special category data (Article 9 + DPA 2018 Schedule 1)

Where applicable, we rely on:

- Employment law obligations
- Safeguarding of children and vulnerable individuals
- Substantial public interest (equality monitoring)
- Occupational health

Purpose	Data	Lawful basis	Special category condition
Application review	CV, application	Contract	N/A
Shortlisting/interviews	Interview notes	Legitimate interests	N/A
Safer recruitment checks	DBS, references	Legal obligation	Safeguarding
Equality monitoring	Diversity data	Legal obligation / Public task	Substantial public interest
Reasonable adjustments	Health data	Legal obligation	Employment/health

7. Who do we share your information with?

We only share your data where necessary and lawful.

This may include:

- Disclosure and Barring Service (DBS)
- Previous employers (for references)
- Recruitment agencies (where applicable)
- Local authority or regulatory bodies (if required)
- IT system providers used for recruitment
- Occupational health providers
- Online recruitment platform providers
- DBS Update Service
- Teaching Regulation Agency (where applicable)
- Department for Education (where required)
- Payroll and HR system providers for successful applicants

This reflects normal education-sector recruitment processing

Important information:

- Some organisations act as **data processors**
- Others are **independent data controllers**

8. International data transfers

Some recruitment or IT systems may store data outside the UK.

Where this happens, we ensure appropriate safeguards such as:

- UK adequacy regulations
- International Data Transfer Agreement (IDTA)
- Standard contractual clauses

You can request further information from the Data Protection Officer.

9. How long do we keep your information?

We only keep personal data for as long as necessary.

Typically:

- Successful applicant data becomes part of your personnel record
- Unsuccessful applicant records are normally retained for six months following completion of the recruitment process unless a longer retention period is required to defend legal claims, comply with statutory requirements or where the applicant has consented to remain within a talent pool for future vacancies.

We follow the **Information and Records Management Society (IRMS) Schools Toolkit**.

10. Your rights

Under UK data protection law, you have the right to:

- Access your personal data
- Request correction of inaccurate data
- Request erasure (in certain circumstances)
- Restrict processing
- Object to processing
- Data portability (where applicable)
- Where processing is based on consent, Right to withdraw consent
- Right to lodge a complaint with the Information Commissioner's Office

While complaints are covered elsewhere, including them within the rights section improves compliance and transparency.

(e.g. 6 months after recruitment)

To exercise your rights, please contact the Data Protection Officer.

11. Complaints

Data protection queries should be addressed to the Data Protection Officer in the first instance. This assists applicants in exercising their rights and demonstrates accountability.

All complaints must follow our complaints procedure, if you have any questions regarding complaints please email admin@romeromac.com

You also have the right to lodge a complaint with the Information Commissioner's Office (ICO) if you believe your data protection rights have been breached.

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline: 0303 123 1113
Website: <https://ico.org.uk>

12. Data Security

We have appropriate measures in place to protect your information, including:

- secure storage of application documents
- restricted access to recruitment data
- staff training in data protection

13. Links with other policies

This data protection policy is linked to our:

- Data Protection Policy
- Safer Recruitment Policy
- Information Security Policy
- Records Management Policy

14. Monitoring and Review

Responsibility for implementing and monitoring this Privacy Notice rests with The Romero Catholic Academy Trust as Data Controller, supported by the Data Protection Officer.

The Board of Directors delegate the implementation of this privacy notice to the Local Governing Body. This Privacy Notice is reviewed annually by CC2 Strategy, People and Organisational Development.