Heathfield Community College and Sixth Form

PRIVACY NOTICE – Ex-School Workforce

INTRODUCTION

Heathfield Community College is the Data Controller for the purposes of the Data Protection Act 2018 and UK GDPR as amended by the Data Use & Access Act 2025.

We ensure that your personal information is:

- processed legally
- processed fairly
- correct
- stored safely
- kept for no longer than needed (see our retention schedule on the College website http://www.heathfieldcc.co.uk/?page_id=1595711)
- is deleted as soon as possible after the expiry of the retention period OR receiving notification that you no longer wish to be contacted by us, whichever is most applicable.

This document describes:

- why we collect data about you
- what data we collect
- what we do with the data we collect
- what your rights are.

WHY DO WE KEEP INFORMATION ABOUT EX STAFF / WHAT IS THE LAWFUL BASIS FOR DOING THIS?

The legal reasons that we keep data about ex-staff are to:

- meet our legal obligations to share certain data with East Sussex County Council (ESCC) & the Department for Education (DfE).
- maintain the public interest to keep accurate records where specific circumstances apply to the ex-member of staff. This may include special category data that is kept as a result of a substantial public interest
- maintain the undertaking of a public task by allowing the smooth running of the department in which you work after you have left our employment
- allow the College to keep you informed about events and gatherings that may be relevant to you, for which we seek your consent. We will always tell you if we need your consent
- preserve the school's history and collective memory. Where we keep records and information containing personal data for a longer time, we do this for archiving purposes in the public interest. We keep these records to preserve the school's history, key events and collective memory. We will provide access to these records for research or statistical purposes, taking reasonable measures to protect the personal data they may contain.

Please see the College's Special Category Data policy for more information about how we process this type of data. This policy can be found on the College Data Protection page at:
http://www.heathfieldcc.co.uk/?page_id=1595711

WHAT DATA DO WE KEEP ABOUT EX-STAFF?

The personal data that we may collect, use, store and share (when appropriate) includes special category information. This is as follows but it is not restricted to these:

- personal identifiers & characteristics such as ethnic group, medical details (special category data), staff photographs
- contact details, employment contract and remuneration details
- appraisal & other disciplinary records
- records of exposure to hazardous substances
- records in relation to safeguarding investigations
- records of the contents of your network homedrive

If you require more information about how ESCC and/or DfE store and use this data please go to the following websites: **DFE**: https://www.education.gov.uk/help/contactus
East Sussex County Council: http://www.eastsussex.gov.uk/contactus/default.htm

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HOW DO WE STORE YOUR DATA AND FOR HOW LONG?

Your data is stored securely in line with our policies on data protection and online safety and IT security. Our management information system (Arbor) is stored in the cloud. Where information is stored outside of the College we ensure that that personal data is protected in line with UK law. We keep your data only for as long as we need to process it. The document that guides for how long we keep specific types of data is called our retention schedule. The retentions schedule can be found on the data protection page of the College website: http://www.heathfieldcc.co.uk/?page_id=1595711

We will keep a limited and reasonable amount of personal information for a longer time, where it appears in records that are of historic value or it is in the public interest to keep as part of the school's history and collective memory. We store these records securely in our school archive for permanent preservation. / We transfer these records to the local archive at East Sussex and Brighton and Hove Record Office (based at The Keep) for permanent preservation.

DO WE SHARE INFORMATION ABOUT EX-STAFF?

We may use Artificial Intelligence (AI) tools to help us work more efficiently with your personal data. When we do so, we only use those tools that do not include the user inputs as part of their learning processes. In all other circumstances, we will not give any information about you to anyone outside the College or Local Authority without your consent unless the law requires us to. For example:

- to facilitate a reference request from a potential future employer.
- to deal with requests from the police in relation to any relevant investigation.

TRANSFERRING DATA INTERNATIONALLY

We do not store or transfer your data outside of the College UNLESS you use email to contact us OR we use AI enhanced tools to process your data. In the latter case the data will be temporarily transferred to the USA before being deleted by the AI tool. All incoming emails are received by us after having been transferred to a malicious email filtering system that may involve a temporary transfer of all emails outside of the UK and EEA. We do this to reduce the risk of the College IT systems being attacked by malicious outside forces. Where information is stored, even temporarily, outside of the UK we also ensure that that personal data is protected in the same way that it is in UK law.

WHAT ARE YOUR RIGHTS?

There are circumstances when these rights don't apply, for example if a law says we need to keep specific pieces of information, or if not processing the data places a student in danger. Your rights are:

- **The right of access** (a "Subject Access Request"). This means you can ask for a copy of the data we hold about you. Contact details for this are found below. We will comply within ONE calendar month
- **The right to be informed.** This means that we will tell you when we are collecting data about you and what it is being used for.
- **The right to rectification**. This means you can ask us to fix omissions and errors in your data
- **The right to erasure**. This means that you have the right to have information we hold deleted.
- **The right to restrict processing**. This means we can still hold the data, but can't use it.
- **The right to object**. This means you can object to processing of personal data under certain circumstances. If we had to ask for your consent, you are under no obligation to provide your consent. You can withdraw consent at any time. Consent can be withdrawn by writing to the address below.

If you have a concern about the way we are collecting or using your data, please contact us in the first instance or directly to the Information Commissioner's Office at https://ico.org.uk/concerns/

HEATHFIELD COMMUNITY COLLEGE DATA PROTECTION OFFICER CONTACT INFORMATION

Data Protection Officer contact details: Sarah Oxenbury, Children's Services, East Sussex County Council. Schools.dpo@eastsussex.gov.uk

REQUESTING ACCESS TO YOUR PERSONAL DATA

In the first instance, you should **contact the Data Protection Lead** in writing at the address below. Subject

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access and other information requests should be made on the appropriate form and you will need to provide appropriate identification. Forms and guidance can be found on the Data Protection website page - here. If you wish to contact us by email, please email DataProtection@heathfieldcc.co.uk . Please DO NOT contact the main office email address as we cannot guarantee your email will reach its intended destination in a timely way.

The Head Teacher / Data Protection Lead
Heathfield Community College
Cade St
Heathfield
East Sussex
TN21 8RJ
Tel: 01435 866066