Heathfield Community College and Sixth Form

PRIVACY NOTICE – Volunteers and Other Adults in or out of Classrooms

INTRODUCTION

Heathfield Community College is a 'data controller' for the purposes of the Data Protection Act (2018) & UK GDPR as amended by the Data Use & Access Act 2025. We collect a small amount of data about volunteers and other adults involved in delivering learning activities to our students.

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 receiving notification that you no longer wish to be on our volunteers or other helpers databases.

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 COLLECT INFORMATION ABOUT YOU?

We collect and store information about volunteers and other adult helpers to:

- facilitate safe recruitment, as part of our safeguarding obligations towards pupils
- keep you safe by identifying you and safely evacuate the school in the event of an emergency
- ensure equalities monitoring
- ensure that appropriate access arrangements can be provided for volunteers who require them
- ensure the safeguarding of students when you are in College
- preserve the College's history and collective memory

More specifically we collect and store information about volunteers and other adult helpers to:

- enable us to contact you and schedule activities that enrich our offer to our current students
- organise and administer activities that require the help of volunteers or other adult helpers.

THE LAWFUL BASIS ON WHICH WE PROCESS THIS INFORMATION

The lawful basis on which we process this information to:

- we have a legal obligation for the safeguarding of students and to keep you safe when you are in College (UK GDPR Article 6 (1))
- comply with your consent for the processing of personal data and your explicit consent for the processing of special category data. If we need your consent, we will let you know. (UK GDPR Article 6 (1) & Article 9 (2))
- maintain "public health", for example during a pandemic (UK GDPR Article 9 (2))

We collect personal information via our volunteer contact forms. Whilst the majority of personal information you provide to us is mandatory, some of it may be requested on a voluntary basis. In order to comply with the Data Protection Act 2018, 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.

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

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.

WHAT INFORMATION DO WE COLLECT ABOUT YOU?

We ask for your name, address, email address and your contact telephone details, references, where necessary, documents to support an Enhanced Disclosure and Barring Service application, such as copies of Passports, Bank statements, Birth and Marriage Certificates, evidence of academic qualifications, employment details, data about your use of or access to the school's information and communication systems, your image & whilst on site your image may be recorded on our CCTV. Special categories of data may include characteristics information such as ethnic group, disability/access requirements or other medical information like allergies.

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. 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 YOUR INFORMATION?

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 only share your information internally unless you have given your consent to do otherwise in advance. For example, with your consent we may use your image and name in the ways summarised in Appendix A. However, we may have to share your data if it relates to a Police investigation.

TRANSFERRING DATA INTERNATIONALLY

We do not store or transfer your data outside of the College UNLESS, for the efficiency of the College, we use AI enhanced tools to process your data OR it needs to be held in cloud storage. The data that we store about you when signing into the college uses cloud storage with a UK datacentre that is certified to ISO 27001. When using AI enhanced tools, the data will be temporarily transferred to the USA before being deleted by the AI tool. Otherwise, we do not transfer your data outside of the UK UNLESS you use email to contact us. 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.
- **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 unless we have to hold that data for another legal reason
- **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 coircumstances. If we had to ask for 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 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 page of the website - 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

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Appendix A: When we might share your personal information

The following are the ways in which we may share your image and name:

- college promotional materials for the sixth form and the Main College
- college parental communication eg the parent newsletter
- college social media accounts
- the internet, eg the College website
- local and national press & media releases
- on our learning platform for the purpose of supporting students' learning
- internal displays around the College
- the Department for Education (DfE) collects personal data from educational settings and local authorities via various statutory data collections.
- to facilitate traded services connected to your visit to us that are purchased through the LA (e.g. for Legal, Human Resources or Information Governance Support)