HURSTPIERPOINT COLLEGE

Summary Privacy Notice for employees, workers and volunteers of the College and those applying to join the College

This notice explains how the College uses personal data about employees, workers, volunteers and job applicants. It deals with two sources of data: that obtained directly from you and that obtained from others or elsewhere.

This privacy notice will be provided to you at the time your data is being obtained, or within one month where we obtain it from someone else.

1. Who we are

Hurstpierpoint College Ltd ("the College") is the data controller for your personal data. The College is a charitable company registered in England and Wales (charity number 1076498 and company number 3779893) with its registered office at College Lane, Hurstpierpoint, Hassocks, West Sussex BN6 9JS. It is registered with the Information Commissioner's Office under reference Z7510412.

The Bursar is the College's Data Compliance Officer and can be contacted at bursar@hppc.co.uk or by post at the address above.

2. What information we hold

- contact details, emergency contacts and identity and right to work documents;
- recruitment information, including your application, references, interview notes and the results of online searches carried out on shortlisted candidates;
- pre-employment check results, including enhanced DBS and barred list checks, prohibition checks, qualifications and medical fitness;
- contract, pay, bank, tax, National Insurance and pension information;
- performance, appraisal, training, absence, disciplinary and grievance records;
- special category data such as health information and, where you choose to provide it, equal opportunities information, and criminal records information; and
- images, CCTV footage and records of your use of College IT systems.

3. Why we use it and our lawful bases

Data will be processed for the purposes of recruiting staff safely, employing and paying you, managing your employment, safeguarding pupils and meeting the College's legal obligations. The College's lawful bases are:

- **contract:** to enter into and perform your contract of employment or engagement;
- **legal obligation:** for example safer recruitment checks under Keeping Children Safe in Education, right to work checks, the College's duties as a UK Visas and Immigration sponsor, tax, pensions, health and safety and equality law;
- **legitimate interests:** for example managing the College effectively, monitoring the security of its IT systems and giving references; and
- **consent:** only rarely, where we tell you we are relying on it.

Special category and criminal records data are processed only where an additional condition in data protection law applies, mainly employment and social security law obligations, safeguarding children, equality monitoring, occupational health and legal claims. The data the College holds will be the minimum it requires to form and maintain the contract between you and the College.

4. Who we share it with

The College may share your data with the following companies who have contracts with the College and are required to protect your data to the standards required by data protection law. These are:

- Sodexo, which provides catering services to the College
- Microsoft and iSAMS, the College's IT software providers
- unifrog (for UCAS data)
- uCheck (for DBS checks)
- SchooliP (for performance reviews and appraisals)
- IRIS (iSAMS) (the College's management information system)
- iFinance or current system (the College's Finance system)
- Access People (the College's HR system)
- School Bus Tracker and Coach Manager (the College's minibus and driver booking and tracking software)

We also share personal data where necessary with:

- HMRC, pension providers (TPT Retirement Solutions and Teachers' Pensions) and the College's occupational health provider Medwyn;
- the Disclosure and Barring Service, the Teaching Regulation Agency and UK Visas and Immigration;
- the Local Authority Designated Officer, the police and children's social care where required to safeguard children;
- the Independent Schools Inspectorate and the Department for Education;
- prospective employers and other organisations who ask for a reference; and
- the College's professional advisers, auditors and insurers.

5. Transfers outside the UK

Some of our suppliers (for example Microsoft) may store or access personal data outside the UK. Where this happens we make sure the transfer is lawful, for example because the country is covered by UK adequacy regulations (which include the EEA and, for certified organisations, the United States) or because the supplier has agreed the UK International Data Transfer Agreement or Addendum.

When the College organises an overseas trip we share with the trip provider, hosts and accommodation the information they need to run the trip safely, including relevant medical and dietary information. We do this because it is necessary for the trip and to protect the welfare of those taking part, so we do not need to ask for separate consent.

6. How long we keep it

Your personnel file will be retained for a period of seven years from the date your employment ends unless modified by any other legal obligation the College finds itself under. Records of any safeguarding allegation are kept in accordance with Keeping Children Safe in Education (normally until your normal pension age or for ten years, whichever is longer) and some pension records are kept for longer. DBS certificate details are not kept for more than six months, although a record that the check was made is kept on the single central record.

Should you not join the College as an employee or volunteer your data will be retained for 12 months unless you agree that it is retained for longer.

7. Where we get it from

We will obtain most of the data the College requires from you. We also obtain information from referees and previous employers, the DBS (through uCheck), the Teaching Regulation Agency, recruitment agencies, occupational health and online searches carried out on shortlisted candidates. Where we obtain data from other sources we will tell you, normally within one month.

8. Whether you have to provide it

We see the provision of personal data as necessary to properly employ you at the College and for the College to fulfil its obligations under the contract once you are an employee here. Some information is required by law (for example right to work and safer recruitment checks). If it is not provided the College may be unable to appoint you or continue your employment.

9. Automated decisions and profiling

There is no automated decision making or profiling involved in this data stream into and through the College.

10. Your rights

Under data protection law you have the right to:

- ask for a copy of the personal data we hold about you (a subject access request);
- ask us to correct data that is inaccurate or incomplete;
- ask us to delete your data or restrict how we use it in certain circumstances;
- object to our use of your data where we rely on legitimate interests and object at any time to direct marketing;
- ask for data you have given us to be transferred to another organisation in certain circumstances; and
- withdraw your consent at any time where we rely on consent (this does not affect anything we did before you withdrew it or any processing for which we have another lawful basis).

Some of these rights are subject to exemptions. To exercise any of them please contact the Bursar.

11. Complaints

If you are unhappy with how the College has handled your personal data you have the right to complain to the College. Please send your complaint to the Bursar at bursar@hppc.co.uk or by post to the College. We will acknowledge your complaint within 30 days of receiving it, investigate it without undue delay and tell you the outcome. Data protection complaints are handled under the College's Complaints Procedure.

You also have the right to complain to the Information Commissioner's Office (ICO) at ico.org.uk or on 0303 123 1113. The ICO will normally expect you to have raised your complaint with the College first.

12. About this notice

This is a summary. It should be read with the College's full Privacy Notice.

This version was published in November 2026 and will next be reviewed by November 2028. Any substantial changes that affect your rights will be notified to you directly as far as is reasonably practicable.