

Host Family Privacy Notice

1. Introduction

Varndean College is committed to protecting your privacy and helping you feel confident about how your personal information, also referred to as 'personal data', is handled. This privacy notice explains how we collect and use your personal information, why we collect it, and what rights you have in relation to the data we hold about you.

Under the Data Protection Act (DPA) and the UK General Data Protection Regulation (UK GDPR), a data controller is the organisation that decides how and why personal data is processed. Varndean College acts as a data controller, meaning we are responsible for determining how your personal information is used and protected. We are required by data protection law to provide you with the information set out in this notice.

This legislation says that personal information we hold about you must be:

- Used lawfully, fairly and in a clear and transparent way
- Collected only for specific, valid purposes that we have explained to you, and not for anything incompatible with those purposes
- Relevant and limited to what is necessary for those purposes
- Accurate and kept up to date
- Kept only as long as necessary
- Stored securely

Our Data Protection Officer (DPO) is Aldona Wheeler. If you have any questions about this notice or the ways in which we use your personal information please contact our Data Protection Officer at Varndean College, Surrenden Road, Brighton, East Sussex, BN1 6WQ, 01273 508011, dpo@varndean.ac.uk.

2. Information the College collects about you

The following personal data is collected from host families:

| Data we collect | Purpose | Legal basis |
|--|---|--|
| Personal details such as name, title, date of birth, gender, marital status, nationality, occupation, religion, ethnicity | To manage our relationship with you | Carrying out our contract with you |
| Address, telephone number, email address | To manage our relationship with you | Legitimate interests: managing our workforce |
| Details of household members (name, date of birth, relationship, occupation) and regular overnight visitors (name, date of birth, relationship, usual residence) | As part of our duty to safeguard students | To meet our legal duty to keep young people safe |
| Bank account details | To process your payments | Carrying out our contract with you |
| Photos of your house | As part of our duty to safeguard students | To fulfill a legal obligation |
| Criminal record information | As part of our duty to safeguard students | To fulfill a legal obligation |
| Medical and disability information | To fulfill our contractual obligations with you | Necessary for our legitimate interests |

3. How we collect your personal information

We generally collect your personal information directly from you through the form and the interview you complete when arranging the host family placement. We regularly review the information we hold to help keep it up-to-date. If any of your personal details change, please let us know as soon as possible so we can update our records.

4. How we use sensitive personal information

It is important to note that, where necessary, we may also process sensitive personal information about you, such as your medical and health information, ethnicity or religion. This information helps us meet both your needs and the needs of our students when arranging placements, and enables the College to fulfil its legal and safeguarding responsibilities.

5. When and how we share your personal information

We may share your personal information with third parties where required by law, where it is necessary to perform our contract with you or where we have a legitimate interest in doing so. These third parties may include the following:

- **Students, parents and guardians:** we may share your personal data with students you may potentially host as well as their parents and guardians
- **Agents:** if the student uses an agent to arrange their study with us we may share your personal data with them
- **Security providers:** to carry out DBS checking services
- **Government departments:** to meet our legal obligations on matters such as visas and social security
- **Police forces, courts, tribunals:** for dealing with legal issues

6. Transferring your data internationally

Your personal information may be stored and processed outside of the country where it is collected, including outside of the European Economic Area. For example, we may send selected details about you to the family of the student who will be placed with you, and to the agent acting on our behalf in that country.

The data protection laws in such countries may not be as comprehensive and provide the same level of protection for your personal data as those within the EEA. In these circumstances, we will take appropriate measures to ensure suitable safeguards are in place.

7. How long we keep your personal information

The College will keep your personal information securely and only for as long as necessary for a legitimate and lawful reason. Personal information will be retained while you are an active partner. Records are created and maintained for each host family, and the information they contain is kept secure and used only for purposes directly related to your role as a host family for Varndean College. Once your role as a host family has ended, your information will be deleted in line with the College's Data Retention Policy.

In some circumstances, personal information may be anonymised so that it can no longer be linked to you. Where this happens we may use this information without telling you.

8. Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit

access to your personal information to those employees, agents, and other third parties who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

9. Your rights

As a data subject, under data protection legislation you have a number of rights. Under certain circumstances you have the right to:

- **Request access** to your personal information, commonly known as a 'subject access request' (SAR). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it. A request can be made in writing or verbally to the Data Protection Officer (dpo@varndean.ac.uk). In most cases there is no fee for a SAR and the College will respond to you in one month.
- **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
- **Request erasure** of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing (see below).
- **Object to processing** of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground.
- **Request the restriction of processing** of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it.

If you wish to exercise any of the rights set out above or wish to ask questions about the way in which we store and process your personal information please contact the Data Protection Officer - dpo@varndean.ac.uk.

No fee usually required

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

What we may need from you

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact us in writing. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate basis for doing so in law.

10. Questions or complaints

If you have any questions or concerns about this privacy notice or how we handle your personal information, or if you wish to exercise any of the rights it refers to, contact the Data Protection Officer, who has been appointed to oversee compliance with this privacy notice.

You have the right to make a complaint at any time to the Information Commissioner's Office (ICO). The ICO's contact details are available on the ICO's website: <https://www.ico.org.uk>.

11. Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.