

THE UNIVERSITY OF BUCKINGHAM

PRIVACY NOTICE

This privacy notice explains how the University of Buckingham ("the University, "we", "our", "us") collects, uses and shares your personal data, and your rights in relation to the personal data we hold. The University needs to hold and process personal data relating to many people in order to keep proper records, provide advice, manage and fulfil contracts, comply with legal obligations and to pursue our legitimate interests as an independent not-for profit institution of higher education. We hold financial information so that we can process payments; information on health and disability so that we can provide support and assistance to students, staff, visitors and guests; and many other categories of information, which are more fully set out below, in order to both run the business and activities of the University, and in order to fulfil our legal obligations.

The University is a data controller of your personal data (ICO Registration number: Z8974286) and is subject to the General Data Protection Regulation ("GDPR"). We take the security and integrity of all the personal data we hold very seriously. We have a Data Protection Policy and our staff are trained in Data Protection. We strive to ensure that our systems are secure. We do not release information about anyone to any third parties outside the University unless we have a legal obligation to do so, or in very specific and limited circumstances; which are set out in this Notice.

If you are a person whose personal data is used by the University in order to carry out research, we take the processing of your data particularly seriously. All research at the University involving human participants is subject to scrutiny and must be sanctioned by the University Research Ethics procedures.

Under the GDPR we are obliged to provide you with information which explains in detail how and why we are processing your personal data and explains your legal rights. General information on Data Protection law is available from the Information Commissioner's Office.

HOW AND WHY WE OBTAIN AND PROCESS YOUR PERSONAL INFORMATION

Please refer to the section of this notice that is relevant to you:

1. Students (pages 3-7);
2. Alumni, Donors, Sponsors, Collaborators and Friends of the University (pages 8-16); and
3. Staff, Contractors, Consultants, Independent Examiners and Invigilators (pages 17-18).

DATA SHARING WITH THIRD PARTIES - GENERAL

All new processes that involve of data sharing/hosting are covered by data sharing agreements or undertakings.

Data may be released to specific third parties in order to carry out research relevant to the staff population but this will only be done where necessary, and when covered by a data sharing agreement.

We will not release data to any third person without there being a legitimate reason to do so, except where you ask us to. This means that we will not release data to banks, friends, relatives etc, without your prior agreement.

The University does not utilise cloud storage outside of the EU and Data sharing agreements are in place for all data stored by third parties which seek to ensure that you enjoy the same protections that you do under this Privacy Notice.

DATA RETENTION

The University does not intentionally retain data for longer than is necessary and data is retained for different periods of time, depending on the need. Certain information is retained indefinitely such as student academic records. Some information is retained for six years so as to protect the University's legal interests. Retention periods for different categories of data are more fully set out in the University's Record Retention Schedule <<under development>>.

YOUR RIGHTS

You have a number of rights in relation to the information that we hold about you. These rights include:

- the right to access information we hold about you and to obtain information about how we process it;
- in some circumstances, the right to withdraw your consent to our processing of your information;
- in some circumstances, the right to receive certain information you have provided to us in a specific electronic format and/or request that we transmit it to a third party in a specific format;
- the right to request that we rectify your information if it's inaccurate or incomplete;
- in some circumstances, the right to request that we erase your information;
- the right to object to, and to request that we restrict, our processing of your information in some circumstances.

COMPLAINTS & FURTHER INFORMATION

If you wish to raise any concerns about this Privacy Notice or the way in which the University processes your data, you should contact the University's Data Protection Officer: David Watson, on 01280 820 383 or david.watson@buckingham.ac.uk

You also have the right to complain to the Information Commissioner's Office which is the UK regulator for data protection. For more information about this body and how to make a complaint, please see www.ico.org.uk.

1. STUDENTS

Students for the purpose of this section, includes prospective students, past students, applicants and individuals who have made enquiries about studying at the University.

How we collect your information

We may collect your personal data in a number of ways, for example:

- from the information you provide to us when you interact with us before joining, for example when you express your interest in studying at the University;
- when you apply to study at the University and complete enrolment forms via the Universities and Colleges Admissions Service (UCAS), or when you apply directly to the University, and when you complete other admissions processes and procedures and interact with our admissions staff;
- when you communicate with us by telephone, email or via our website, for example in order to make enquiries or raise concerns;
- in various other ways as you interact with us during your time as a student of the University of Buckingham, for the various purposes set out below; and/or
- from third parties, for example from your previous or current school, sixth form college, university or employers who may provide a reference about you or who may sponsor your studies.

The types of information we collect

We may collect the following types of personal information about you:

- your name, and contact information such as address, email address and telephone number, as well as your date of birth, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality;
- information relating to your education and employment history, the school(s), sixth form college(s) and other colleges or universities you have attended and places where you have worked, the courses you have completed, dates of study and examination results. We will also keep records relating to assessments of your work, details of examinations taken, your predicted and actual examination grades and other information in your student record;
- information about your family or personal circumstances, and both academic and extracurricular interests, for example where this is relevant to the assessment of your suitability to receive a bursary or in order to provide you with appropriate pastoral care;
- special category personal data, as defined in the GDPR and information about criminal convictions and offences, including:
 - information concerning your health and medical conditions (e.g. disability and dietary needs);

- certain criminal convictions (e.g. for students on nursing programs, following completion of an annual declaration of “good character”); and
- information about your racial or ethnic origin; religion or similar beliefs; and sexual orientation.
- you will also be allocated a unique student number by the University.

How we use information about you

The purposes for which we may use personal data (including special category data and data relating to criminal convictions or offences) that we collect during a student's association with us include:

- recruitment and admissions purposes;
- academic matters, including:
 - the provision of our core teaching, learning and research services (e.g. registration, assessment, attendance, managing progress, academic misconduct investigations, certification, graduation);
 - maintaining student records;
 - assessing your eligibility for bursaries and scholarships, etc; and
 - providing library, IT and information services.
- non-academic matters in support of our core services, including:
 - providing student support services;
 - monitoring equal opportunities;
 - safeguarding and promoting the welfare of students;
 - ensuring students' safety and security;
 - managing student accommodation;
 - managing the use of social media; and
 - managing car parking on campus.
- administering finance (e.g. fees, scholarships and bursaries);
- other administrative purposes, including:
 - carrying out research and statistical analysis;
 - carrying out audits (e.g. to ensure compliance with our regulatory and legal obligations);
- providing operational information (e.g. providing IT support, information about building closures or access restrictions on campus, or safety advice);

- promoting our services (e.g. providing information about summer schools, student exchanges, or other events happening on and off campus);
- preventing and detecting crime;
- dealing with grievances and disciplinary actions; and
- dealing with complaints and enquiries.

Graduation and degree information

Personal data (including award and classification) will be published in the award ceremony booklet. This information will also be passed to third parties involved in the ceremonies (including our local paper and commemorative clothing suppliers). All published details will be available on our archive and our website following the relevant graduation events.

You may withhold your consent to your name being published for these purposes when you register online to attend the award ceremony or graduate in absentia.

The basis for processing your information and how we use it

We may process your personal data because it is necessary for the performance of our contract with you or in order to take necessary pre contractual steps. In this respect, we use your personal data for the following:

- to interact with you before you are enrolled as a student, as part of the admissions process (e.g. to send you a prospectus or answer enquiries about our courses);
- once you have enrolled, to provide you with the services as set out in our Student Agreement;
- to deal with any concerns or feedback you may have; and
- for any other purpose for which you provide us with your personal data.

We may also process your personal data because it is necessary for our or a third party's legitimate interests. In this respect, we may use your personal data for the following:

- to provide you with educational services which may not be set out in our Student Agreement but which are nevertheless a part of our academic and educational mission;
- to monitor and evaluate the performance and effectiveness of the university, including by training our staff or monitoring their performance;
- to maintain and improve the academic, corporate, financial, estate and human resource management of the university;
- to promote equality and diversity throughout the university;
- to seek advice on our rights and obligations, such as where we require our own legal advice;
- recovering money you owe to us; and
- for fundraising purposes.

We may also process your personal data for our compliance with our legal obligations. In this respect, we may use your personal data for the following:

- to meet our compliance and regulatory obligations, such as compliance with anti-money laundering laws and safeguarding requirements;
- for the prevention and detection of crime;
- in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities.

We may also process your personal data where:

- it is necessary for medical purposes (e.g. medical diagnosis, provision of health or social care or treatment, or a contract with a health professional);
- it is necessary to protect your or another person's vital interests; or
- we have your specific or, where necessary, explicit consent to do so.

Sharing information with others

For the purposes referred to in this privacy notice and relying on the bases for processing as set out above, we may share your personal data with certain third parties. You are given the opportunity to opt out of some of these data sharing arrangements, for example when you register with us, but you should carefully consider the possible impact of doing this. Unless an opt-out is in place, we may disclose limited personal data to a variety of recipients including:

- our employees, agents and contractors where there is a legitimate reason for their receiving the information such as student welfare in order to determine the reasonable adjustments that need to be made to accommodate a disability;
- third parties who work with us to provide student accommodation;
- third parties who work with us to provide student support services (e.g. counselling);
- third parties who are contracted to provide out-of-hours IT services for us;
- organisations operating anti-plagiarism software on our behalf (such as Turnitin®);
- internal and external auditors;
- those with an interest in tracking student progress and attendance, including: student sponsors (e.g. the Student Loan Company, research sponsors, Research Councils, NHS);
- current or potential education providers (for example, where you take part in an exchange programme as part of your course);
- current or potential employers (to provide references and, where students are sponsored by their employer and/or where you take part in a placement, to provide details of progress/attendance);
- professional and regulatory bodies (e.g. General Medical Council, Health Care and Professions Council, British Psychological Society, Solicitors Regulation Authority, Bar Standards Board, Association of Chartered Certified Accountants) in relation to the confirmation of qualifications, professional registration and conduct and the accreditation of courses;
- government departments and agencies where we have a statutory obligation to provide information (e.g. the Higher Education Funding Council for England (HEFCE), the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and

- immigration), Council Tax and Electoral Registration Officers at relevant local authorities (for the purpose of assessing liability for Council Tax and for electoral registration purposes));
- NHS trusts, NHS foundation trusts and Local Authorities (for the purpose of assessing whether you are entitled to free NHS hospital treatment);
 - crime prevention or detection agencies;
 - parents, guardians, and next-of-kin (where there is a legitimate reason for disclosure);
 - third parties conducting surveys, for example the National Student Survey

International data transfers

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area ("EEA"), for example where it is processed by staff operating outside the EEA who work for us or for one of our suppliers, or where personal data is processed by one of our suppliers who is based outside the EEA or who uses storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred on one of the following bases:

- where the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

Students' Union

We share some of the information we hold about you (including your name, date of birth, nationality, University email address and programme of study) with the Students' Union at The University of Buckingham ("SUBU") unless you notify us that you wish to opt out of SUBU membership.

SUBU use this information to administer membership of the Students' Union. SUBU will also send some of the student data we provide to the National Union of Students ("NUS").

SUBU and the NUS will give students the chance to opt out of various categories of processing when they register on the SUBU website, and to update their preferences by amending the privacy options on their profile page.

Fundraising and Alumni Relations

We pass certain of your personal data to our Alumni Department when you register and when you graduate. This information will be used for alumni activities, including sending University publications, promotion of alumni benefits, services, events and programmes. Your personal data may also be used in fundraising programmes. We may also disclose limited personal data to our contractors for analysis in connection with fundraising activities.

For more information about how your personal data is used by the Alumni Department, please see the section of this Notice relating to Alumni below.

If you do not want your personal data to be used for any of these purposes, please email:
alumni@buckingham.ac.uk

National Student Survey and Leaver Surveys

We will send some of the student information we hold to the Higher Education Statistics Agency ("HESA"). HESA collects and is responsible for the database in which HESA student records are stored. Details of how HESA will process this information can be found at:
<https://www.hesa.ac.uk/about/regulation/data-protection/notices>.

We may pass student contact details to survey contractors to carry out the National Student Survey and surveys of student finances for the organisations identified by HESA in their data protection notices referred to above. These organisations and their contractors will use student's details only for this purpose, and will then delete them.

About six months after graduation, we will contact each student to ask him or her to fill in the HESA "Destination of Leavers from HE" questionnaire. Students may also be contacted as part of an audit to check that we have undertaken this survey properly. We will not give your contact details to HESA.

Students may also be included in surveys that track the progress of leavers in the years after they graduate. If so, we will pass your contact details to the organisation that has been contracted to carry out that survey. The organisation will use your details only for that purpose and will then delete them.

If you do not want to take part in any of these surveys, please let us know.

Changes to your personal data

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by emailing registry@buckingham.ac.uk.

2. ALUMNI, DONORS, SPONSORS, COLLABORATORS, BENEFACTORS AND FRIENDS OF THE UNIVERSITY

When you are a student of the University you automatically become a member of the University and normally become a member of the University alumni community. The University promises to provide alumni services to University alumni and this promise is part of the student contract. The University regards these services as an important and integral part of the University's long term commitment to its students. The University also, through its development and marketing departments, processes personal data on a number of past, current and prospective donors, sponsors, collaborators, benefactors and friends of the University.

We obtain personal data regarding you from the following sources:

- Data already held by the University via a transfer from the University's student central and local databases to the alumni database upon graduation;
- Data provided by you, for example, when you:
 - registered for AlumNet or University affiliated social media pages online;
 - provided information through our website, newsletter competitions, volunteering discussions or when making donations;
 - completed and returned surveys or response forms such as contact preference forms and Gift Aid forms (by mail, email or via a University website);
 - discussed it with University representatives;
 - registered to attend an alumni or University event event
 - Attended and event, via telephone calls, from returned post
 - Made a donation or entered into a contractual arrangement with the University
- Data obtained from third party sources such as:
 - organisations that assist us with pursuing our purposes described below
 - public sources of information including media articles, company and charity filings, social media posts; and
 - information from other alumni who may be peers and/or friends, other family members

Categories of personal data being processed

The information that we collect and process includes personal data (i.e. information relating to you by which you can be directly or indirectly identified).

Some personal data that we collect or hold includes "sensitive personal data" as described under the DPA or "special categories of data" as described under the GDPR. Such "sensitive personal data" or "special categories of data" includes information about your racial or ethnic origin, religious or other beliefs, physical or mental health. This data would only be processed if:

- you have directly provided it yourself with your consent to use it for the purpose/s specified;

- in the course of legitimate activities such as for event management purposes (e.g. for assessing access requirements arising from a disability) or for selecting a particular group of alumni who may be interested in a specific alumni function (e.g. an alumni function that is held in the country that you are a national of);
- it has been sourced from information that we believe you have clearly made public (e.g. it appears in your public linked-in profile or in your public profile on other social media); and/or
- it is necessary for archiving purposes in the public interest, scientific or historical research or statistical purposes.

The data we may process includes:

- your title, name (including former name or alias), gender, date of birth
- photographic image
- your education record
- the University accommodation where you lived
- the Union societies and clubs that you joined
- your contact information (address, telephone, email, social media)
- your business details including positions, organisation, professional memberships and qualifications Your salary?
- your career highlights and other lifetime achievements
- your outside interests and membership of groups
- information about your wealth
- information from articles in the media about you
- your family details, including spouse or partner, and relationships with other alumni, supporters and potential supporters
- events you have been invited to and whether or not you have responded or attended
- your donations of time, expertise or money
- a record of interactions with you for future reference and to help tailor further communications with you
- generally information that you have decided to share with us
- information on you as a scholar and information scholars are required to complete (e.g. progress reports)

The purposes for which we process your personal data:

We will use your data to help us maintain an engaged alumni community and for development and marketing purposes. We may process your personal data for the following purposes:

Administration

- to verify an account and provide a personalised experience for you when you register for the Alumni Online website
- to process a gift you have given (and any Gift Aid claims)
- event registration
- to process and organise any volunteering activity you have agreed to undertake
- to keep a record of communications between us

Fundraising and volunteering

Fundraising supports:

- schemes to encourage people to enter higher education
- scholarships for our students
- University research
- improvements to the University's structure and facilities
- student activities
- arts and cultural activities

Volunteering supports:

- student recruitment activity in the UK and overseas
- mentoring
- internships
- careers support for students and graduates

Sharing memories

When meeting with alumni we sometimes share 'pass lists' which detail the first name, surname, degree and classification for other individuals who graduated from the same course in the same year. These lists are used to remind alumni about their student days; enabling them to reminisce.

The information can also help the University to make contact with alumni we may have lost touch with. Individuals with whom the lists are shared are asked if they are in touch with anyone on the list and, if appropriate, asked to approach these individuals to establish if they would like to receive communications from the University.

Reunions

On occasion members of the alumni community host reunions. To help the organiser establish who to invite the University provides some information.

The University provides organisers with details of alumni from a selected year group and course, as requested by the organiser. Details provided include first name and surname (as it appears on the

University's alumni database), degree, course and year of graduation. Details usually indicates who the University is in contact with and who is deceased.

Research

To ensure that we do not make inappropriate requests in our fundraising and volunteering communications, we may carry out research to assess your likely ability and willingness to make gifts to or volunteer for the University.

This research may include collecting and storing data relating to you that is in the public domain (such as career history, directorships, shareholdings and remuneration) as well as data that has been provided by you, including your interests, and University activity you have previously been involved with (donations, volunteering, event attendance etc.) This research is sometimes known as prospect research or wealth profiling.

Profiling and planning

We use your data (such as your postcode, nationality, subject of study, age, gender and level of engagement with the University) to help us plan our activities, and determine if we should contact you with certain communications, or information about particular activities. It helps us identify how our alumni are involved with the University, and which alumni activities are most popular. This research helps ensure our communications (including fundraising or volunteering requests) are relevant and of interest to you.

We do not conduct any wealth screening of individuals but do make use of data held in the public domain relating to the wealth of individuals to identify those who may be interested in supporting the University with a significant philanthropic gift.

Automated decision making

The Alumni and Development teams use various modelling tools that will automatically process your data to assess the likelihood of you being able to make a donation to the University or of becoming involved in alumni activities. However, we believe this does not produce a legal effect concerning you or similarly significant affect upon you in terms of article 22 para 1 of GDPR.

Anonymised data

Personal data may be anonymised so as to no longer constitute personal data and such anonymised data may be used to support alumni and development activities.

Due Diligence

Please note that if you wish to make a gift to the University we may process your personal data, including information from the public domain, for due diligence purposes, in accordance with our Gift Acceptance and Naming Policy. View our Gift Acceptance and Naming Policy

Keeping your data up to date

We will update the data we hold on you from time to time. For example, if you provide us with new contact details. We will respond to your request for your data to be updated.

We may update your contact details by using third party sources/services such as Royal Mail NCOA (National Change of Address). We also use these services to check if there are people we should no longer contact (for example, if someone has died). Where third parties provide these services to us they are only allowed to use your data in accordance with the strict instructions of the University. The third party is required to hold the data confidentially and securely and will not use your data in any other way. Your data will only be kept for as long as necessary and will then be destroyed.

AlumNet and Social Media

If you have registered through AlumNet or with a university affiliated social network group, you can select what personal information will appear in your profile. See the user agreement/s of AlumNet and relevant social media sites for more information.

Fellow alumni

We also facilitate communications between individual alumni, but in doing so we do not release personal contact details without your prior permission.

Higher Education Statistics Agency (HESA)

All UK universities are obliged to give contact details for a sample of recent graduates to HESA in order to conduct a survey of graduate destinations.

Graduates will be contacted 15 months after graduation. See https://www.hesa.ac.uk/files/HESA_Student_Collection_Notice_2017-18.pdf.

These surveys help to inform government policy. They are also used in calculations for university league tables and by the universities themselves to assess the longer-term impact of the student experience. The data is provided to HESA strictly and solely for this purpose. All recent graduates to whom this applies will be given the opportunity to opt out of the survey when they are first contacted.

Graduate surveys by third parties

Sometimes the University is requested to share graduates' contact information with third parties who are facilitating alumni surveys, which feed into university league tables and rankings. These include, but are not limited to: Financial Times, The Economist, QS and Times Higher Education/Wall Street Journal rankings.

When it is necessary to share your contact details with these third parties, you will be given prior notice by the University and the option to opt out of the survey when you are first contacted.

Sharing data with countries outside of the EU

In the event that it is necessary to share your data with individuals or organisations outside of the European Union, we will ensure that there are appropriate safeguards in place as required by the GDPR.

Communications

We will from time to time communicate with you by email, post and telephone to pursue the purposes mentioned above. In particular we regularly communicate with people for the following purposes:

- share news about the University (including its research and services) and our alumni (including promotion of discounts and services for alumni)
- invite you to events and reunions
- invite you to support our fundraising activity
- invite you to volunteer for the University. This includes providing advice and guidance to students and University representatives and giving support to students during their time at University and in their career.

To manage your communication preferences or to withdraw or vary the consent/s that you have given to receive communications, please email alumni@buckingham.ac.uk.

Legal basis for processing your data

GDPR is a new law coming into effect on 25 May 2018 and it has not yet been applied to circumstances similar in context to our relationship with alumni. The extent of lawful grounds for processing data has yet to be fully understood and further guidance and/or codes of practice are anticipated from the ICO. As legal views mature and further guidance is given, the University may from time to time reassess its legal basis for processing.

The University will sometimes process your data based upon your consent. You have the right to withdraw or vary your consent at any time (see your rights as a data subject below)

The University has made a contractual commitment to students, as lifetime members of the University, to provide services and activities for alumni. Therefore the University will also be processing data often on the basis that it is necessary to enable it to meet its contractual commitments to alumni.

The University believes that by supporting University alumni and other development activities it is acting in the public interest. In particular it is supporting the University's charitable object of education and the benefits to society that flow from that.

Sometimes the University will be processing your data because you have clearly made it publicly available.

Finally, the University believes that its activities are necessary for the purposes of the legitimate interest of the University and other third parties. These interests are not overridden by the interests and fundamental rights or the freedoms of the data subjects concerned and whether or not there is a legitimate interest in processing the data will be dependent on the circumstances of each situation. Legitimate interests of the University and third parties focus on supporting educational activities and ongoing developmental activities for University alumni and others.

It is recognised that some of the above grounds will overlap and that the University could rely on multiple grounds as the lawful bases for the processing of personal data.

Supporters/Friends/Donors

We look after personal data collected by the University during the course of our relationship with you if you give of your time, influence or money to philanthropically or otherwise support the University's mission.

Potential Supporters/Friends/Donors

If you have been identified as a potential partner or supporter of the University, your personal information will have been brought to the University's attention either directly by yourself, or as a referral from a third person or through research conducted by the Development and Alumni Relations Office to find people who may have an interest in the work of the University arising from either geographic proximity or potential mutual interests.

We will contact you, as a potential supporter, with a view to securing a meeting or networking opportunity in order to discuss areas of mutual interest, partnership or benefit. When we contact you we will make you aware of this privacy statement, how we obtained your personal information, and you will be at liberty to opt out of receiving further communications at any time.

Preferred Methods of Communication

Your communications preferences are important to us. You can choose whether you'd like to be kept in touch, by post, telephone, or email, by emailing us at alumni@buckingham.ac.uk. If you have not indicated a preference previously and you have registered your email address with us, the default method of communication will generally be email.

If you no longer wish to receive some or all of these communications you can unsubscribe.

Your contact details are used to provide you with information about:

- University news
- Events (including invitations to exclusive events)
- Products – such as courses of study or University merchandise
- Services – such as our Sports Facilities (accessible at a special rate to alumni), Careers support, and the University Library
- Opportunities to support the University – including volunteering opportunities (such as becoming a mentor to a current student, hosting or helping us to run an event), fundraising for us (perhaps by taking part in a sponsored walk, run, or bake sale), and direct fundraising appeals to support the University (such as for our research or student scholarships).
- Marketing – to include information on overseas recruitment trips and UK Fairs where alumni can get involved if they wish.

Please tell us promptly about any changes to the information we hold about you. This is particularly important for your contact details. You can do this by emailing alumni@buckingham.ac.uk.

3. EMPLOYEES

Employees for the purposes of this section includes, in so far as is relevant, all staff (both past and present), job applicants, contractors, consultants, independent examiners and invigilators who have personal data processed by the University. The personal data that is processed includes personal special categories of data such as ethnicity, disability or medical data collected and data relating to criminal conviction and offences.

The Categories of Data We Hold and What we use it for

The University processes your personal data, including special categories of data, for a variety of purposes, involving all aspects of the administration of your contract of employment, for statistical purposes and for the purposes of equal opportunities monitoring.

It is your responsibility to inform us as soon as possible if data we hold about you is incorrect or requires updating. Staff are able to see a range of data about themselves on the intranet via the HR portal. This includes contact and identification information, information relating to medical conditions or disability, emergency contact details, current job details, absences, bank details, pay history, HESA details and career development details. Staff can change/update many of these items themselves and are encouraged to do so on a regular basis. Where it is not possible for staff to update their own details, staff in Human Resources (HR) will be able to do it for them. We collect the contact details of a person nominated by you for emergency contact purposes. It is the responsibility of staff to ensure that their emergency contacts have given permission for us to contact them in the event of an emergency. You must remember to update this information as and when necessary.

Our legal basis for processing your data

The University's primary legal basis for processing your personal data is that the processing is necessary for the performance of the contract between you and University. The data we require you to provide at the commencement of your employment is data that we deem necessary to fulfil our contract of employment or which we are obliged to request by law. Some data of job applicants is used for recruitment and selection purposes, it being a legitimate interest of the University to conduct competitive recruitment practices and ensure that applicants meet the required job specifications. Failure to provide this data may result in a contract not being awarded or being withdrawn. We also ask that you provide certain data on a voluntary basis such as that relating to medical conditions, disability or ethnic origin. You are not obliged to provide that data and it will not affect the decision whether to award you a contract of employment if you fail to provide it. When you are asked to provide information on a voluntary basis we will specify what that information will be used for and you will be asked to specifically consent to such use. Although withholding of non-mandatory data will not preclude you from being awarded a contract, there may be other adverse consequences which you will need to consider if you do not provide the information. For example, if you do not disclose that you have a disability, it may not be possible for the University to make the reasonable adjustments necessary to accommodate that disability.

Some Data that you provide will be used for statistical and monitoring purposes. When this is done the data will be anonymised in so far as it is practicable to do so. Data is sometimes shared with third parties for such analysis or for the third parties to provide HR related services on behalf of the University. Your Data will only be shared with third parties if the University is satisfied that those third parties will process it in manner which is compliant with the GDPR and which is consistent with this Privacy Notice.

Sharing of Your Personal Information Within the University

Only those members of staff within the University who need to have access to the data you provide when you begin your employment, and those who update information via the Staff portal, such as your Line Manager, will have access. Staff within HR and the Finance department will have access to your data, as may some administrative staff within your School or department as your line manager, and the Dean of your School. If you disclose any special category personal data at any time during your employment, that data may be shared with specific departments or agencies, such as the

University's Occupational Health service, but this will only be done with your prior knowledge / consent. Your university contact details will be shared with all permanent staff.

Sharing of Personal Information with Third Parties

It is not possible to list all of the bodies with whom we might have to share your personal data, but the following are examples of when the University will release data about you to third parties where you ask us to, where we have a legitimate reason to use that data in connection with your employment here at the University, or where the University is under a legal requirement to provide data.

- Data may be released to third parties, such as HMRC, in relation to matters associated with your employment. We are required to pass data about you (in coded and anonymised form) to the Higher Education Statistics Agency (HESA) which then creates your HESA Staff Record. Some of this anonymised data will be passed to other statutory bodies involved with the funding of education, but it cannot be used in any way that could affect you personally. For further details of how your HESA Staff Record may be used by HESA please go to <https://www.hesa.ac.uk/about/regulation/data-protection/notices> .
- Details of any reportable accidents are referred to the Health and Safety Executive (HSE). Data provided to the HSE will include the personal data of any individual involved in the accident.
- Your data may be used to produce anonymous statistics to show workforce trends.
- Your data will be passed to Pension Funds administrators.
- We may release data to the police and other enforcement agencies in emergencies and where it is required by these agencies for the prevention or detection of crime.
- Data may be released to the third party organisations that host University data
- the University has staff discount arrangements with third party retailers. The University will not provide such retailers with any personal data about you except to confirm – on request – that you are a member of University staff, if you decide to take advantage of the scheme.

