

Staff Data Collection Notice

How the College uses staff personal data (fair processing notice)

The processing of staff data is necessary in order for the College to comply with its legal obligations and for the organisation to function effectively. In the controlling and processing of this data the College will act in accordance to the rules laid out by the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

This notice explains how the College collects, uses and shares personal data relating to prospective, current and former employees, workers, contractors, consultants, voluntary workers, interns, academic visitors, honorary post holders and work experience individuals (you/your) and your rights in relation to the processing of your personal data.

In this notice:

- **personal data** means any data which can identify you directly or indirectly (whether by itself or when combined with other data), regardless of the format or media on which the data are stored. This includes data that can identify you when combined with other data that is held separately (pseudonymous data) but does not include data that has been manipulated so that you can no longer be identified from it (anonymous data).
- **processing** means any activity relating to your personal data including collection, use, alteration, storage, disclosure and destruction.

The official purposes for which the Royal Holloway and Bedford New College (the College) processes personal data are notified to the Information Commissioner, and can be viewed on the Office of the Information Commissioner's Register. The College's Registration Number is Z7056965.

How we collect your personal data

Most of the personal data we hold about you will have been provided or observed about you in the course of the application and recruitment process or during the course of your working relationship with the College. We have collected some of your personal data because it is mandatory, but some of it will have been provided on a voluntary basis.

Personal data from third parties

We may sometimes collect additional information from third parties including:

- your CV from any recruitment agencies that were authorised by you to approach the College regarding a position
- references from former employers, colleagues or other relevant parties
- information collected as a result of formal background checks, e.g. DBS checks
- information requested from external sources to assist in the consideration of promotion to academic posts.

Types of personal data processed

Depending on your role, this notice sets out the types of personal data that the College may collect and process about you, including "special categories of personal data" which are particularly sensitive and require us to take additional steps to ensure their security and confidentiality.

Personal data provided by you about others

You may provide us with personal data about other individuals, for example, next of kin/emergency contact details and information about your family circumstances and dependents. You should notify the relevant person that you are providing their contact details to the College and in what capacity (i.e. as your listed next of kin/emergency contact).

How the College uses personal data about you

Depending on your role, the College may process personal data (including special categories of personal data) about you for the following purposes:

- the administration of prospective, current and former employees, workers, contractors, consultants, voluntary workers, interns, academic visitors, honorary post holders and work experience individuals
- the recruitment and selection process
- completion of pre-employment checks
- the administration of payroll, pensions and benefit services
- planning and management of the College's workforce
- pensions administration
- absence management i.e. occupational health, wellbeing
- disciplinary, capability and grievance matters
- employment tribunals
- training, development and performance management
- ensuring staff are appropriately supported in their roles
- assessing the College's performance against equality objectives as set out by under College policies and Statutes
- Compliance with legal obligations such as statutory returns to HESA and HMRC.

The College needs to process special category data for a number of administrative purposes. These include:

- Equal opportunities monitoring and compliance with obligations under College policies, Statutes and equal opportunities legislation
- Managing processes such as absence and family friendly policies including maternity and shared parental leave

Lawful grounds for processing your personal data

We will only use your personal data when we are permitted to do so by law. Most commonly, we will use your personal data:

- **to perform a contract** the College has entered into with you or take steps before entering into a contract with you at your request (for example, your employment contract or contract for services)

- **to comply with the College's legal obligations** (for example, complying with employment and tax, immigration, health and safety and safeguarding laws, preventing and detecting crime, assisting the police and other authorities with their investigations)
- **where necessary for our legitimate interests** or those of a third party provided your interests and rights do not override those interests (for example, evaluating the suitability of a candidate for a role or defending employment claims brought by you)
- **to protect your vital interests** or those of another person (for example, where we know or have reason to believe that you or another person may suffer harm)
- **to perform a public task** in the public interest or in the Colleges official functions, and the task or function has a clear basis in law.

In circumstances where you have a genuine choice as to whether we should process your personal data, we will ask you for your **consent**. The method used to obtain your consent will depend on the scope and context of the processing that we propose.

In relation to special categories of personal data and personal data relating to criminal convictions and offences, we may request your **explicit consent** unless a condition applies which allows us to process such personal data without doing so.

What personal data will be collected

The data the College collects includes:

- Personal contact details
- Emergency contact details
- Next of kin details
- Education, professional qualifications details
- Pre-employment check information including right to work in the UK documentation
- Previous employment and reference details
- Pay, pension and benefits details
- Annual leave
- Disciplinary and grievance records
- Absence records and medical details including sabbatical leave and medical details
- Probation records
- Promotion information including details on individual circumstances
- Performance Development Review records
- Training and development records (including psychometric questionnaires, as required)
- Visual images
- Academic records relating to publications and research grant awards.

Special category data processed may include:

- Age
- Sex
- Sexual orientation
- Gender reassignment
- Disability
- Pregnancy and maternity
- Ethnic origin
- Trade union membership
- Religion or belief
- Physical or mental health details

- Spent and unspent criminal convictions

How long the College will retain your personal data

The College must only retain your personal data for as long as necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements.

Specified retention periods are applied to each category of personal data that we may process about you. In setting these retention periods, the College has taken into account:

- the nature, sensitivity and volume of the personal data
- the potential risk of harm to you arising from the College's continued retention of the personal data
- the purposes for which the College may process your personal data
- whether the College is required to retain any personal data by law or in accordance with its legitimate interests

Your data will be kept in accordance with the College's Records Retention Policy and Schedule.

In general, all relevant correspondence in relation to your employment or engagement will be held and retained for at least 10 years, or longer where necessary after you have left the College or your engagement has ceased, after which time it will be securely disposed of. Basic information about your employment or engagement (appointment, dates of service etc.) will be retained indefinitely.

In some cases, the College may anonymise your personal data so that it can no longer be identified with you, in which case the College may retain such data indefinitely.

If notice of a claim or Pre-Action or Early Conciliation correspondence is received, then we may retain and process relevant personal data to defend the claim for the duration of the proceedings. Whilst we may dispose of any personal data after the conclusion of the claim, please be aware that all litigation documents disclosed or evidence given may be a matter of public record.

Staff Directory

Staff (and sometimes consultants, contractors' and casual workers) contact details will be available via the [Staff Directory](#) and Outlook Address book. This will include name, job title, telephone number, email address, room and department. Information, such as CVs, photos and research interests, may also be made available on departmental/school websites and the College's research information system.

The information is made available on the basis of the College's legitimate interest in ensuring that colleagues, students and, where applicable, members of the public, can contact our staff and to promote the College's work.

Where there is good reason, members of staff may apply to the Data Protection Officer to have their contact details removed from public view. This may be a temporary or permanent change depending on the circumstances. If you wish to make such an application, please email: dataprotection@royalholloway.ac.uk.

CCTV and automatic number plate recognition (ANPR)

The College has a comprehensive, image-only CCTV surveillance system across its campus. Cameras located on and within buildings are monitored by Security. On occasions, Security staff will wear Body Worn Cameras in the course of their duties. These cameras record both images and sound, and data captured in this manner is processed in compliance with GDPR.

College uses ANPR (Automatic Number Plate Recognition) camera technology to manage, control and enforce parking on its sites. They are governed under guidelines from the Information Commissioner's Office on the use of CCTV and ANPR Cameras and are operated by College's Security team. In exceptional circumstances this information may be used as evidence in disciplinary cases.

Sharing your personal data with third parties

Where there are lawful grounds for doing so, the College may share your personal data with third parties. A list of parties with whom we share the data includes but is not limited to the following:

Government departments, affiliated organisations and Higher Education bodies including:

- [Higher Education Statistics Agency \(HESA\)](#)
- [UK Visas and Immigration \(UKVI\)](#)
- [HM Revenue and Customs \(HMRC\)](#)
- Disclosure Barring Service ([DBS](#))
- [Office for Students \(OfS\)](#)
- Department for Work and Pensions (DWP) as required by the Social Security Administration Act 1992
- Child Maintenance Service as required by the Child Support Information Regulations 2008
- Research Excellence Framework ([REF](#))

Organisations contracted by the College to perform specific functions including:

- NorthgateArinso UK Ltd (HR & Payroll System provider)
- Stonefish Software Ltd (Online recruitment System provider)
- Bright Horizons Family Solutions Ltd (Workplace Nursery provider)
- The College's internal and external auditors

Organisations with which the College has a relationship to fulfil specific obligations or objectives including:

- Pension schemes – including [SAUL](#) and [USS](#) (as set out in the scheme rules)
- Trade unions
- Athena Swan
- Race Equality Charter Mark
- Equality Objectives
- Disability Confidence Scheme
- Gender Pay Gap and Equal Pay audits
- Childcare Vouchers
- Cycle to Work Scheme
- Staff Survey

Organisations with which members of staff have a relationship including:

- Where staff are also employed by, contracted to, or perform duties for the NHS, relevant information will be shared with the NHS as required
- Research sponsors/funders
- Potential employers (where a reference is requested)

Where the College uses third parties to process personal data on its behalf (acting as data processors), a written contract will be put in place to ensure that any personal data shared will be held in accordance with the requirements of data protection law and that such data processors have appropriate security measures in place in relation to your personal data.

Parents, family members and guardians are considered to be third parties and your personal data will not be disclosed to such persons unless you have given your consent or the disclosure is otherwise made in accordance with data protection law.

Please note that we may need to share your personal information with a regulator or to otherwise comply with the law, and the list above is not necessarily exhaustive.

HESA statutory return

Each year the College is required to send some information we hold about you to HESA. HESA is the official source of data about UK universities, higher education colleges, alternative HE providers, and recognised higher education courses taught at further education institutions in Wales.

This information is not needed for all roles but where it is, your HESA information does not contain your name or contact details, but may contain your Open Researcher and Contributor ID (ORCID.org) number if you have one.

Your HESA information is used for a variety of purposes by HESA and by third parties. HESA may charge other organisations to whom it provides services and data. Uses of your HESA information may include linking parts of it to other information, as described below. Information provided to HESA is retained indefinitely for statistical research purposes. Your HESA information will not be used to make automated decisions about you.

You can read the [HESA Staff Collection notice](#) on the [HESA](#) website.

International Data Transfers

Most personal data about you, including your personnel file, will be stored on servers within the UK or elsewhere within the European Economic Area (EEA).

On occasion it may be necessary for the College to transfer your personal data outside of the European Economic Area (EEA). This will only take place in circumstances where there are appropriate and adequate safeguards in place which incorporate appropriate assurances to ensure the security of the information and compliance with legislative and regulatory requirements.

How the College keeps your personal data secure

The College has put in place appropriate technical and organisational security measures to prevent your personal data from being accidentally lost, used or accessed in any unauthorised way or altered or disclosed. In addition, the College limits access to your personal data to the persons and organisations, including those described above, who have a lawful and/or legitimate need to access it. For further information, see the [Cybersecurity](#) pages on the [Staff Intranet](#).

The College has also put in place procedures to deal with any suspected personal data security breach and will notify you and any applicable regulator of a suspected breach where legally required to do so.

Your responsibilities

You must ensure that any personal data collected and processed by you in the course of performing your duties and obligations is held in accordance with the College's Data Protection Policy. Any research involving the use of personal data should only be conducted following an ethical review. You are also subject to the College's [Information Security Policy](#).

Where a breach of security involving either electronic or paper records relates to personal data, the Data Protection Officer must be informed, as there may be an infringement of the Data Protection Act 1998 which could lead to intervention by the Information Commissioner's Office and potentially civil or criminal proceedings. It is vital, therefore, that users of College information systems comply, not only with this policy, but also with College's Data Protection Policy and associated codes of practice, details of which may be found on the Staff Intranet.

Members of staff are able to notify the College of any changes to their contact details via [MyView](#). It is important the College has an accurate record of staff details in case there is a need to make contact with staff in emergency circumstances. Changes to your HESA return details should also be made via [MyView](#). You are required to keep this information up to date.

You and your data

You have a number of rights in relation to the processing of your personal data by the College:

- **Access:** You have the [right to request access](#) to and be provided with a copy of the personal data held about you together with certain information about the processing of such personal data to check that the College is processing it lawfully and fairly.
- **Correction:** You have the [right to request correction](#) of any inaccurate or incomplete personal data held about you.
- **Deletion:** You have the [right to request erasure](#) of any personal data held about you where there is no good reason for the College to continue processing it or where you have exercised your right to object to the processing of your personal data.
- **Restriction:** You have the [right to request restriction](#) of how the College processes your personal data; for example, to confirm its accuracy or the College's reasons for holding it or as an alternative to its erasure.
- **Objection:** You have the [right to object](#) to the College's processing of any personal data which is based on the legitimate interests of the College or those of a third party based on your

particular circumstances. You also have the right to object to the College processing your personal data for direct marketing purposes.

- **Portability:** You have the right to receive or [request that the College transfers](#) a copy of your personal data in an electronic format where the basis of the College processing such personal data is your consent or the performance of a contract, and the information is processed by automated means.
- **Complaints:** You have the right to complain to the [Information Commissioner's Office \(ICO\)](#) or any other [EU supervisory authority](#) in relation to how the College processes your personal data.

The College may be entitled to refuse any request in certain circumstances and where this is the case, you will be notified accordingly.

Where the lawful ground relied upon by the College to process any of your personal data is your consent, you have the right to withdraw such consent at any time without having to give any reason. However, if you do so, the College may not be able to provide some or all of its services to you or the provision of those services may be affected.

You will not have to pay any fee to exercise any of the above rights, though the College may charge a reasonable fee or refuse to comply with your request if any request is clearly unfounded or excessive. Where this is the case, you will be notified accordingly.

To protect the confidentiality of your personal data the College may ask you to verify your identity before fulfilling any request in relation to your personal data.

Changes to this notice

The College may update this notice at any time and may provide you with further notices on specific occasions where we collect and process personal data about you. You should check this notice regularly to take notice of any changes. Where any change affects your rights and interests, we will make sure we bring this to your attention and clearly explain what this means for you.

Questions or comments

If you have any questions or comments regarding this notice or you wish to exercise any of your rights you should contact our Data Protection Officer by email at dataprotection@royalholloway.ac.uk.

You also have the right to complain to the Information Commissioner's Office and you can find more information on their website – www.ico.org.uk