

# STAFF PRIVACY NOTICE

## ABOUT US

This Privacy Notice explains how your personal data is handled by the University of Reading. This notice applies to staff of the University of Reading and the Henley Business School.

The University (**We** or **Us**) is data controller in respect of the information that We process about you for recruitment and employment purposes. Our contact details are The University of Reading University of Reading, Whiteknights, PO Box 217, Reading, Berkshire, RG6 6AH, United Kingdom. Tel: +44 (0) 118 987 5123.

This notice explains what personal information We collect, hold and share in support of these purposes and your rights in respect of the data We hold about you.

Your privacy is important to Us, so if there is anything in this privacy notice that is unclear or you do not understand, please contact Our Data Protection Officer at: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

Staff includes:

- Employees (including temporary or short term workers) of the University or any subsidiary company of the University.
- Volunteers, interns and those undertaking placements or work experience.
- Contractors engaged by the University and/or any subsidiary company of the University.
- Students working for and/or on behalf of the University and/or any subsidiary company of the University, including Post Graduate Research students.

## DATA WE COLLECT ABOUT YOU

To manage its operations effectively, comply with our obligations under our work contract with you, to meet certain legal requirements, and for the performance of our public tasks, the University will need to collect, record, store, use, share, retain and destroy your personal data (hereafter referred to as 'process' or 'processing'). This personal data may include your name, address, contact details, date of birth, domicile, marital status, next of kin, emergency contacts, qualifications, CV's, past employment, references, payroll data, national insurance number, pensions data, financial details, details of your job title and duties, absence records (including holiday records, self-certification forms and medical certificates), health records, health and safety incidents, information on your membership of, or being a representative of, a trade union, your photograph, access you may have to our property and how you use it, details of leave for family or personal reasons, communications with those responsible for managing you, others working with you and with the Human Resources department, information on your performance, digital data on your use of our telephone and IT systems including laptops, computers, tablets, smartphones, and other devices provided by us and information for insurance purposes (whether that insurance is taken out by us for our own benefit or to provide a benefit to you). We may also process data that relates to disciplinary matters, complaints (whether by you or about you), or fitness to practice proceedings where applicable. We will also process your personal data if you have subscribed to additional services the University offers, such as registering as a member of the Sports Park or University schemes, clubs and societies. Some of the additional services the University

provides may have separate Privacy Notices that you will be directed to when you book, join or subscribe to those services.

We may also collect information regarding criminal conviction declarations, and for certain roles, information about past criminal convictions will be processed for the purposes of safeguarding the wellbeing and security of our staff, students and visitors, or for ensuring We meet obligations for public protection, including those requiring checks with the Disclosure Barring Service (DBS).

The University has a comprehensive, image-only CCTV surveillance system across its campuses. Cameras located on and within buildings are monitored by trained staff from the building or School whose areas the cameras are designed to protect, and Security Control. Full details of the purposes of the monitoring, access to images and staff training are given in the University's CCTV Code of Practice (PDF-134KB).

Every vehicular entrance to the Whiteknights campus has an automatic number plate recognition (ANPR) camera that monitors cars entering and leaving the campus 24 hours a day. Data gathered via ANPR will be used in the review of traffic and parking on campus.

Your personal data may also be used within the University to provide you with general services, such as access to the Library, staff resources and computer facilities.

In addition to this, the University may process some sensitive personal data about you (defined as special category data), such as details about your ethnicity, sexual orientation, gender identity, health and disability to facilitate the monitoring of equal opportunities, and statistical and research purposes. We collect data about your health in accordance with our sickness absence policy and to ensure that we comply with our legal obligations.

We may also collect information for the purposes of administering University Occupational Health schemes where applicable.

We may collect this data directly from you or via third parties such as employment agencies, other staff members, third party references or agents that are acting on your behalf.

In some cases, where the information is a statutory or contractual requirement, or necessary for your work contract, and you fail to provide certain information, there may be consequences for you. If that is the case (for example you fail to provide us with information we have to pass to HMRC), we will make sure we give you adequate opportunity to provide the information and to tell you what the possible consequences of your failure to provide it are.

## **OUR LAWFUL BASIS FOR USES OF YOUR DATA**

Under data protection laws We must have a legitimate and lawful basis for processing your personal data. There are several lawful grounds within data protection law that can apply and these are explained below:

### **For the performance of a contract (or negotiations entering into a contract)**

This will apply to any personal data that We process for the purposes of administering and delivering your employment contract. This will extend to data collected for the purposes of administering Occupational Health services and Health and Safety monitoring.

The vast majority of uses of your personal data will be for this reason, and will apply to the data you provide when applying to work with or for the University through to your resignation or retirement.

Your personal data will be processed by necessary departments within the University for all purposes connected with your employment. This can include managers, HR personnel, pension scheme

administrators, trustees and trustees' advisers, rewards and benefits, people development, finance, payroll, IT, IMPS, legal services, health and safety, occupational health, remuneration committees and those involved in the monitoring of equal opportunities or administering disciplinary or grievance matters.

### **For the performance of a public task in the public interest**

Some uses of your personal data are required so We can meet our obligations or duties, or to exercise our powers, as a public authority, or to support the functions of other authorities that have a public task defined within law or statute. Examples of this would include our obligation to share data with the Higher Education Statistics Authority, to collect and retain data to support public health or safety measures, for safeguarding or crime and fraud prevention measures, for exercising our functions as a University and the need to retain a basic record of employees that have worked with Us for verification of past employment, qualifications, and for reference purposes, or for performance monitoring purposes, to ensure that we are able to manage our staff throughout the duration of their contract with us and beyond. We may also be required to share personal information with our external regulators, auditors, assessors, and professional bodies. In all cases the personal data shared will only be that which is necessary for the purposes and subject to the University having measures on place to ensure that data is handled in line with data protection laws.

### **To protect life**

In some circumstances We may need to collect or share personal data when it in a person's vital interests to do so. For example we may share your personal information with the emergency services or between internal departments, such as security, occupational health and health and safety teams if there is significant and credible evidence to suggest that you, or someone else may be in danger.

### **Legal obligations**

In some circumstances We may be required by law to collect, hold or share your personal data. For example, where We are obliged to provide certain information to HMRC for PAYE purposes, where We are ordered by a court of law to disclose information or to meet financial reporting obligations, such as those required by HMRC.

### **For legitimate interests**

In some instances We may process your personal information where We judge the use to be within our legitimate interests (or the legitimate interests of another party) and where We do not deem this be a privacy intrusive or a risk to your own rights and freedoms. For example, We may need to process personal information for the purposes of identifying or rectifying issues with our IT services, Where the use of data poses no risks to individuals and is for the purposes of improving services or investigating technical issues, this is likely to be the basis that will apply. We also share limited personal data with providers of our rewarding staff schemes for the purposes of administering those rewards.

### **Consent**

We may also process your personal information with your consent. Consent must be freely given, informed, specific and We must keep a record of that consent. Where you have consented to a use of your data you will have the right to withdraw that consent at any time. An example may be where you have given Us consent to discuss your circumstances with a representative or family member. However, this will not be the basis upon which we rely for the majority of the personal information we process about you.

Where we are processing special categories of personal information about you, or information which relates to criminal convictions, the commission/alleged commission of criminal offences or criminal proceedings we will only process the information where:

- It is necessary for our or your obligations or rights in the field of employment law or social security law (and for this purpose we have a separate policy document which is reviewed from time to time and which outlines how we protect such information and how long the information is held for); and/or
- The personal information has been manifestly made public by you; and/or
- It is necessary in relation to legal claims; and/or
- It is necessary for reasons of substantial public interest. UK law places our monitoring of diversity and equality of opportunity in this category providing certain safeguards are in place; and/or
- It is necessary to protect your life or the life of someone else and you are physically or legally incapable of giving consent.

## WHO WE SHARE YOUR DATA WITH

The University may disclose necessary personal data to third parties, where there is legitimate need or obligation, during or after your period of employment. Such disclosure is subject to procedures to ensure the identity and legitimacy of such third parties. These third parties may include the following depending on your individual circumstances:

### **Universities Superannuation Scheme (USS)**

If you are eligible, the University provides some personal data to the trustees of the USS for the purposes of administering your pension. This information, where applicable, is shared for the performance of your work contract and to meet our legal obligations or for the purposes of administering a public task in the public interest.

### **Higher Education Statistics Agency (HESA), HE funding councils and other government bodies**

Your personal data will be provided to HE funding councils, government bodies and HESA. Further details about the data shared with HESA can be found in the [HESA staff data collection notice](#) on the HESA website. This information is shared for the purposes of administering a public task in the public interest.

Where applicable your personal data may be shared with AYMTM Ltd, the company that operates our Celebrating Success scheme. This information is shared for the purposes of administering staff reward schemes and on the basis of being in our legitimate interests.

**UCEA – University and Colleges Employers Association.** This information is provided for the purposes of providing advice and guidance on Employment matters and on the basis of administering a public task in the public interest. More information about how UCEA use your personal data can be found [here](#)

**ONS – The Office for National Statistics,** This information is shared for the purposes of providing statistical information on the University Human Resources. This information is shared on the basis of administering a public task in the public interest.

### **Employment agencies, prospective employers and third parties requesting confirmation of employment or qualifications.**

The University will routinely require the consent of staff before disclosing details of any qualifications. However in the absence of consent it may confirm qualifications or employment without notifying the staff member, although such a disclosure would be subject to checks on the validity of the request. This information is either shared with your consent, for the purposes of administering a public task in the public interest or where it is in our legitimate interests, dependant on the circumstances.

## Police, crime and taxation

The University may have a power or obligation to provide information to the Police or other organisations that have a crime prevention or law enforcement function, such as Benefit Fraud Sections within Local Authorities, if it is necessary for the prevention or detection of a crime, the apprehension or prosecution of offences, or the collection of taxes. This information is shared for the purposes of performing a public task in the public interest or where there is legal obligation.

## The Little Learners Day Nursery

Some Nursery staff are provided with limited access to some staff information for the purposes of billing and administration. This information is shared where it is in our legitimate interests

Our subsidiaries, including overseas where applicable;

Insurance and pension companies we use to provide employee benefits and insurances such as health insurance and car insurance. We also sometimes provide information to brokers for the purpose of arranging insurances;

Occupational Health providers, doctors and other health professionals who provide us with advice on employee medical conditions (and there are separate rules around our access to such information);

HMRC, regulatory authorities, and Government Departments to comply with our legal obligations in relation to, for instance, safe recruitment, tax, sick pay, maternity etc. pay and social security information;

The Disclosure and Barring Service where applicable to your work with us;

Research grant funding

For academic staff we may share, salary details, grades or spine points with Research Office staff in other universities and research organisations and academic staff in those organisations who are party to bids for grant funding. This is for the purposes of preparing accurately costed grant applications and shared on the basis of administering a public task in the public interest.

We also use third party providers to deliver our services, such as externally hosted software or cloud providers, including some that involve transfers of data outside of the EU. Where we do this, to ensure that your personal data is treated by those third parties in a way that is consistent with and which respects the EU and UK laws on data protection, We have required such third parties to agree to the EU model clauses (or equivalent measures) on transfers of data to parties outside of the EU. .

# RETENTION OF YOUR DATA

Retention of your personal data is subject to the University [records retention schedule](#)

This schedule sets out the timeframes and reasoning for retaining different categories of personal data We may hold about you. Personal data that relates to the performance of your staff contract and interactions with supporting departments across the University will be retained for 6 years after the end of our relationship with you. This may be longer if you have an appeal, complaint or ongoing matters with the University after you leave the University.

Some information will also be retained for longer periods for the purposes of administering and supporting University pension schemes and for employment or qualification verification or reference provision purposes.

In some circumstances We may anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes in which case We may use this information indefinitely without further notice to you.

# KEEPING YOUR INFORMATION UP TO DATE

The accuracy of your information is important to Us. You can update your information, including your address and contact details, at any time.

The University uses [Employee Self Service \(ESS\)](#) which is a web based tool which allows you direct access to the University's Human Resources record of your personal details and employment information. ESS enables employees to view their personal details, absence, pay and benefits, employment and training and qualifications information. It is available from anywhere (not just on campus) and can be accessed using your computer, tablet or smartphone.

If you need to update the details We hold about you, it is your responsibility to update and correct these details on ESS.

## YOUR RIGHTS

Under data protection law you have the right to:

- Withdraw your consent where that is the legal basis of our processing
- Access your personal data that We process
- Rectify inaccuracies in personal data that We hold about you
- Be erased, that is your details to be removed from systems that We use to process your personal data
- Restrict the processing in certain ways
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by Us

Please see the ICO website for further information on the above rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

Some rights are dependent on the lawful basis for processing your information. If We have legitimate grounds to not carry out your wishes, these will be explained to you in response to your request. Due to the nature of our relationship with you and our reasons for processing your personal information, in many cases we may not be able to comply with your request in relation to the rights listed above. However, we will tell you if that is the case and explain why.

More information on data subject rights can be found [here](#)

[If you wish to exercise any of your rights, please contact our Data Protection Officer, using the contact details below.](#)

## QUESTIONS ABOUT THIS NOTICE

If there is anything in this notice that you are unclear about, please contact our Data Protection Officer, on the contact details below, who shall be happy to answer any queries you may have concerning this privacy notice or the way in which We process your personal data.

By mail: Information Management and Policy Services, The University of Reading, Whiteknights, PO Box 217, Reading RG6 6AH

By email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)

By phone: 0118 378 8981

Complaints can be referred to the Information Commissioners Office, the independent body who oversee Data Protection compliance in the UK.

Email: [casework@ico.gsi.gov.uk](mailto:casework@ico.gsi.gov.uk)

## CHANGES TO THIS NOTICE

We keep our privacy notice under regular review to ensure best practice and compliance with the law. This privacy notice was last updated on 25/05/2018

We may change this privacy notice from time to time. If We make significant changes in the way We treat your personal information We will make this clear on our website and may seek to notify you directly.

## HOW TO CONTACT US

If you have any questions about this notice, our University Data Protection Officer can be contacted at:

IMPS

University of Reading

Whiteknights

PO Box 217

Reading

RG6 6AH

UK.

Telephone: 0118 378 8981. Email: [imps@reading.ac.uk](mailto:imps@reading.ac.uk)