

## Data Protection Privacy Notice: Staff and Other Individuals who Work with the University in a Paid or Unpaid Capacity

### Introduction

The University of Strathclyde is committed to transparency and to complying with its responsibilities under data protection legislation. This privacy notice sets out important information regarding how we will use your information and your rights under the legislation. This privacy notice relates to individuals in the categories of: employee; worker; assignee; volunteer; trainer; external secondee; visiting/honorary member of staff; consultant; agent; contractor; and collaborator. A separate privacy notice is available for Court members/trustees.

### The Legislation

The University is subject to data protection legislation which regulates how organisations are allowed to use personal data. This notice is intended to meet the transparency requirements of the legislation and to ensure that all individuals in the categories above know how their data will be processed.

### Who will process my personal information?

Under the legislation the University is the 'data controller'. This means that the University is responsible for how it uses and processes your personal data and for complying with requests from you in relation to your personal data, where appropriate under the legislation.

### How we use your information

We have set out below: where we obtain your information; the main purposes for which we will use your information; who it is shared with; if it is transferred internationally; and information relating to retention.

For each type of processing we are required to identify our 'lawful basis for processing'. This is set out in Appendix 1. The different lawful bases available are available via our website [www.strath.ac.uk/dataprotection](http://www.strath.ac.uk/dataprotection) for both personal and special categories of personal data.

### Is my data secure?

Your personal data will be managed securely. Access will be restricted to only those staff or authorised agents who require it and on a 'need to know' basis. The University will employ any technical and organisational measures necessary to protect your data. You can find more information about our [Information Security policies](#) on our website.

### Keeping information updated

The University strives to ensure that your personal data is accurate and up-to-date. Staff also have a responsibility to update changes to their contact information via Pegasus. In addition, you should advise the University of any inaccuracies in the personal data held about you.

### Retention of Personal Data

The University will retain your personal data only for as long as is necessary for the purposes described. Details of how long the University retains staff information is set out in the relevant retention schedule available on the website. Please note that after you cease to work with the University, we will still require to hold your personal data for a period of time to satisfy statutory/legal obligations and/or to meet administrative



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requirements. Limited, anonymised information will also be retained to allow the University to perform statistical analyses.

## Your Rights

You have the right to:

- find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- ask us to correct inaccurate or incomplete data.
- withdraw consent to process your personal data at any time, if you were asked for and provided consent.

If you think we are acting unfairly or unlawfully you can:

- object to the way we are using your data;
- complain to the [UK Information Commissioner's Office](#).

Under certain conditions you also have the right to ask us to:

- restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns;
- erase your information or tell us to stop using it to make decisions about you;
- comply with your wishes where you have previously agreed to us processing your data for a particular purpose and have withdrawn your consent to further processing;
- provide you with a portable electronic copy of data you've given us.

Please contact us if you wish to exercise/enquire about any of these rights.

## Contact Details

Data Protection Officer  
University of Strathclyde  
Information Governance Unit  
16 Richmond Street  
Glasgow, G1 1XQ  
Email: [dataprotection@strath.ac.uk](mailto:dataprotection@strath.ac.uk)  
Phone: 0141 548 3217

## More information

To find out more about data protection and your rights please see:

- The Information Commissioner's Office website: <http://www.ico.org.uk>.
- The University's Data Protection webpages <http://www.strath.ac.uk/dataprotection/>

## Where do we obtain information from?

We obtain personal data about you from a variety of sources:

- directly from you in your application (this includes references from individuals you have listed on your application);
- or throughout your time as an employee/engagement with the University, e.g. Annual Development Reviews and any updates you make to My Personal Details within Pegasus
- as a result of any University policies/procedures e.g. disciplinary/complaints; and

- from agencies from which we are legally-obliged to seek information (such as Disclosure Scotland and previous employers, in relation to data required for submissions to the Higher Education Statistics Agency, HESA).

### **What information about you do we collect and use?**

When you become a member of staff we will create a central 'personal file' for you. This consists of the information provided in your application and other additional information added during the course of your employment. Other information may be held in different locations, depending on your engagement with other areas of the University or the business function of that area. Personal information may be held in electronic or hard copy format on various University systems relating to:

- personal and contact information (including emergency contacts);
- education records (including qualifications, skills and personal statements);
- evidence of your right to work in the UK;
- evidence of a Resident Labour Market Test
- provision of, access to and use of IT systems and information;
- employment and training details;
- references;
- banking details;
- casework and attendance records;
- goods or services provided;
- visual images; audiovisual recordings
- occupational health, safety and wellbeing.

'Special category' and criminal conviction data, as defined in the legislation, is also processed where it is necessary and lawful for us to do so. In most cases for special category data you have the option whether or not to provide this information (or the option to choose 'prefer not to say'). Special category data is subject to additional protections and refers to data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership;
- physical or mental health;
- sexual life or sexual orientation;

NB data relating to criminal convictions and offences is subject to strict processing requirements and is only processed when appropriate in accordance with the law.

### **Why do we collect and use your personal data?**

The University collects, holds and uses a wide range of information about you for various reasons including:

- administrative and financial management purposes;
- academic and research purposes;
- performance management;
- to meet our duty of care to you;
- to meet our legal obligations;
- public safety and the prevention and detection of crime;
- archiving and research purposes;
- promotion of the University;
- ensuring health and safety (including monitoring);
- ensuring equality of opportunity;
- providing occupational health services;
- attendance/absence management (includes leave of any kind and medical information submitted, where appropriate);
- management and security of the campus/estate and facilities (including CCTV and access management);
- equal opportunities monitoring.

The University also has a legal duty of care to its staff, students and others affected by its undertaking. It is therefore necessary for the University to maintain a list of key staff or third party key contacts who the University (usually via Security Control) can contact in the event of (or in order to prevent) an emergency or significant loss or disruption affecting the safety or continued operation of the University.

Detailed information regarding the purposes for which we process your personal data and our legal basis for processing can be found in Appendix 1.

### **Who do we share your data with?**

In some situations the University will share your personal data with external organisations. Often this is where we have a contractual agreement with an organisation to provide services to us, or we have a legal obligation to provide information e.g.: pension administrators/providers; insurers; auditors; researchers; other organisations in the course of funding, accrediting or reviewing the quality of University activities. For staff employed and paid outside the UK this may include sharing data with relevant government bodies in the country/territory in which you are employed to meet local legislative requirements, e.g. relating to tax and income declaration.

In other cases, we may share data where it is in our legitimate interests to do so, in which case we will undertake an appropriate assessment to evaluate and reconcile the interests of the University with those of the data subjects.

### **Who has access to data?**

Your information will be shared internally, including with members of the HR and recruitment teams (including payroll), your line manager, managers and administrative staff in the business area in which you work and staff in Information Services and other professional services, if access to the data is necessary for performance of their roles.

The University shares your data with third parties in order to obtain pre-employment references from other employers and to obtain employment background checks from third-party providers. For certain roles, you will need to apply to [Disclosure Scotland](#), this includes posts requiring clearance under the Protection of Vulnerable Groups (PVG) scheme. The University will countersign your form and will be notified of the outcome; in such cases, obtaining relevant clearance may be a condition of your continuing employment with the University.

The University also shares your data with third parties that process data on its behalf, in connection with payroll, the provision of benefits and the provision of occupational health services.

In addition to those listed above we also may share your data when requested by the following bodies:

- partner organisations involved in joint/collaborative course provision or where staff participate in teaching/administrative staff mobility or exchanges;
- relevant UK government departments, e.g. HMRC, Home Office UK Visas and Immigration;
- Higher Education Statistics Agency (HESA). For more information on what HESA does with your personal data see the [HESA Staff Collection Notice](#).
- law enforcement agencies;
- relevant authorities dealing with emergency situations at the University;
- Scottish Funding Council;
- research funding bodies or bodies managing financial administration/monitoring of research funds, including research councils and EU funding bodies;



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- professional, statutory and regulatory bodies e.g. Scottish Public Services Ombudsman, Office of Scottish Information Commissioner; Information Commissioner's Office; Health & Safety Executive
- potential employers;
- Accreditation bodies, e.g. Advance HE, BALEARP;
- Collective organisations of which the University is a member, such as the Universities and Colleges Employers' Association (UCEA), and other agencies with which the sector collaborates for employer benchmarking purposes;
- affiliated external providers of facilities/services you have chosen to utilise/receive, e.g. third party parking providers;
- any other authorised third party to whom the University has a legal/contractual obligation to share data with.

### **Is my data made publicly available?**

The University makes some information publicly available via its website to enable individuals, including students, potential students and research partners to identify individuals they wish to communicate with. Your name, department/section, job title, email address and telephone number will normally appear in the University's staff and telephone directory. Staff may choose to provide an image of themselves to accompany their entry in the staff directory. If you submit a personal statement and a photograph within Pegasus, these will become publicly-available via the Staff Search pages of the University website.

It is expected that staff, particularly those involved in learning, teaching and research, will provide information to be published on the website for academic/business purposes including academic qualifications and professional recognition, brief biography, professional/research interests, activities and outputs. Research outputs are held in the University's research repository, PURE, and will identify academic/research staff involved.

Certain activities, such as lectures, may be recorded or audio recorded to support online learning, or to implement recommended reasonable adjustments for staff or students with disabilities or additional requirements. If the University wishes to use images of staff etc. in its publicity material (where the individual is the focus of the image), consent will be obtained.

### **Is my data transferred internationally?**

Some personal data may be transferred internationally for example:

- where the University is involved in collaborations/course provision with or for organisations and educational institutions overseas,
- where the University is involved in staff and student exchanges and academic partnerships;
- where the University works with overseas student recruitment agencies and partner institutions limited staff data may be transferred;
- information published on the University's website is accessible internationally;
- the University may engage third parties to provide systems/services which are hosted outside the European Union;
- in emergency situations for international staff we may transfer data internationally where it is necessary to ensure your vital interests, e.g. contacting next of kin in medical emergencies.

Whenever we transfer data internationally we will make sure that appropriate safeguards are in place to protect your information and your rights to privacy.

### **What if you do not provide personal data?**

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the university to enter a contract of employment with you. If you do not provide the required

information, this will hinder the university's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

**How long do we retain your data?**

Retention periods for staff records held and managed by Human Resources are as set out in the University's HR retention schedule. Staff data held in other areas may be subject to different retention periods. University retention schedules can be accessed online via our website

<https://www.strath.ac.uk/ps/strategyandpolicy/recordsmanagement/>.

## Appendix 1

<b>Purpose</b>	<b>Lawful basis – personal data</b>	<b>Lawful basis - special category data</b>
<b>Staff administration, management and legal purposes</b>		
Equality of opportunity monitoring and complying with requirements under legislation	Legal obligation	Substantial public interest; archiving purposes in the public interest, scientific or historical research purposes or statistical purposes
Management and administration of staff and employment, e.g. staff appraisals, performance review/management, training and development; staff mobility/exchanges	Contract; public task; legal obligation	
Sharing data with third parties for: joint/collaborative course provision; staff exchanges and international agents/partners	Contract, public task	
Accounting and financial processes; payroll and pension administration (including outsourcing of payslip production for hourly-paid workers); payment of expenses; anti-fraud checks; and workforce planning	Contract; legal obligation; public task	
Sharing data with pension administrators/providers	Legal obligation, contract	Necessary re employment, social security & social protection; Substantial public interest
Annual leave management	Contract	
Absence and special leave management (sickness, maternity/paternity/parental, other leave)	Contract; legal obligation	Obligations in relation to employment; Substantial public interest; assessment of working capacity of employee
Handling grievance, disciplinary and complaints	Contract; public task	Obligations in relation to employment, social security & social protection;

		substantial public interest; assessment of working capacity of employee
Dealing with enquiries by external regulators/bodies with official authority/powers, e.g. SPSO, ICO, OSIC, Home Office	Legal obligation; legitimate interests	
Provision and management of University services e.g. IT services; library; verification processes and events	Contract; public task; legal obligation	
Providing and managing paid-for services, e.g. car parking, sports centre membership	Contract	
Organising travel, including travel abroad	Contract; legitimate interests	Consent
Management of estate services, e.g. car parking, room bookings, access to buildings	Contract	
Manage payments for any paid-for services/goods via online shop	Contract, legal obligation	
Communications to staff, including surveys	Contract, legitimate interests of assessing staff opinion on certain topics	
Health and safety monitoring and reporting	Legal obligation	Substantial public interest
Management reporting	Contract; public task; legitimate interests	
Defending University in case of legal proceedings	Legal obligation, legitimate interests	Establishment, exercise, defence of legal claims
Obligations in relation to Tier 2, 4 & 5 licence obligations	Legal obligation	Obligations in field of employment and social security and social protection law; substantial public interest
Security checks, including Disclosure Scotland and PVG applications and outcomes	Legal obligation, Consent	Substantial public interest, Consent
Accreditation from third parties, e.g. Athena Swan	Legitimate interests	Consent
<b>Academic, teaching and research purposes</b>		



Retain research information and outputs (articles, theses, datasets etc.) in private and publicly accessible systems	Contract; public task	
Submissions for research benchmarking exercises/analysis, e.g. REF	Contract; public task	
Accreditation from third parties for academic purposes	Contract; public task	
Promotion of the University, e.g. press releases/images (moving and still)	Legitimate interests – promoting the University Consent	
Recording of lectures	Contract; public task	
Managing the student academic process	Contract; public task	
Managing the research process, including: applications; administrative and financial reporting requirements of funders; open access and data preservation requirements of funders	Contract, public task; legitimate interests	
<b>Safety, security and prevention and detection of crime</b>		
Operation of CCTV system	Legitimate interests	
Control of access to buildings/facilities	Contract; legitimate interests	
Issuing of identification/access cards	Contract	
Occupational health services, including counselling	Consent, contract; public task	Obligations in field of employment and social security and social protection law; substantial public interest
Health and safety monitoring, reporting and compliance	Legal obligation, contract	Substantial public interest
Disclosing information to emergency contacts and/or third parties in emergency situations	Vital interests of the data subject or another person	Vital interests of the data subject or another person
Where we must comply with a legal obligation	Legal obligation	Dependent on legal obligation cited
Fulfilling statutory reporting requirements, e.g. Higher Education Statistics Agency (HESA). See <a href="#">HESA's Collection Notices</a>	Legal obligation	Substantial public interest
<b>Archiving and research</b>		

Retention of University records; promotional materials and other records of University life, including images	Public task; legitimate interests	
Staff benchmarking data, sectoral analysis	Legitimate interests	