

Staff Privacy Notice

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A. Introduction

The purpose of this notice is to explain to you how the University may use any personal data collected from you. This notice contains examples of many of the common uses of such data. Staff are made aware of the policy as they enter employment with the University. The policy is also available on the University website.

B. Who is processing personal and sensitive personal data?

Leeds Trinity University determines why and how your personal data is used and, as such, is considered legally to be the data controller of the personal data. This places legal obligations on the University including that the University must process personal data fairly and lawfully and in a transparent manner.

The University is registered with the Information Commissioner's Office as a data controller under the reference Z4817023.

C. What personal data do we process

Leeds Trinity University processes personal data that is necessary for us to fulfil our obligations as an employer. This includes:

- information about you and your employment with us and your communications with us including details of your demographic background, employment history, education and qualifications
- financial information about you gathered for the purposes of payment of salaries and pensions and other staff benefits
- copies of passports, visas, and other documents required to ensure compliance with Home Office and other conditions
- photographs and other identification information for staff ID cards
- information about your performance management, and training and development
- records about staff relations including disciplinary cases, grievance cases and absence management
- information about your use of Information Technology services

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Special category data

We may also process “special category data” which includes information about your racial or ethnic origin, religious beliefs or other beliefs, sexual orientation, physical or mental health. We may also process information concerning any criminal offences or criminal proceedings.

D. The legal basis for processing your personal data / special category data

(i) Contract

We may use and process your personal data and special category data when it is necessary to do so in order to fulfil the employment contract with the University when becoming employed.

The University only collects information that is necessary to manage your employment relationship with us and in order to meet its legal and statutory obligations in delivering the contract.

(ii) Legitimate interests

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or a third party's legitimate interests. Such legitimate interests can include:

- monitoring and investigating the use of IT services to maintain network and information security
- testing our systems to ensure optimum performance
- verifying the accuracy of data that we hold
- analysis of data to evaluate performance throughout the University
- promoting equality, diversity and inclusion throughout the university
- the prevention and detection of crime and assisting investigations carried out by relevant authorities
- dealing with disciplinary matters
- dealing with complaints
- providing a safe and healthy work environment, ensuring the wellbeing of staff
- minimising the risk to the public as well as the delivery and continuation of operations

(iii) Legal obligation

We may also process your personal data in order to comply with our legal obligations. This can include:

- provision of personal and special category data to regulatory bodies where the University is legally required, in order to fulfil statutory obligations
- compliance with regulatory obligations such as anti-money laundering laws and safeguarding requirements
- assisting with investigations (including criminal investigations) carried out by the police and other competent authorities
- complying with court or other competent authority orders
- compliance with relevant national Health & Safety legislation, in particular government guidelines surrounding COVID-19 test and trace or other crisis management schemes

(iv) Vital interests

The University will only rely on vital interests as a lawful basis for processing your personal data where it is necessary to protect someone's life.

(v) Consent

The University will use consent as a lawful basis for some processing. Where we do so we always provide you with the choice as to whether or not to opt in to such processing.

- We will provide references and confirmation of employment with your consent
- We may process personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management)

E. What we use personal and special category data for

Leeds Trinity University processes your personal data and special category data for a number of purposes including:

- Human Resources administration such as recruitment, payment of salaries and pensions and other staff benefits, performance management, and training and development
- maintaining your staff record
- the provision of staff services (e.g. Information Technology services)
- promoting the health and well-being of all staff
- to meet the legal and statutory obligations of the University
- equal opportunities monitoring
- evaluating the performance and effectiveness of the University including research and statistical analysis
- promoting our services and other operational reasons (including displaying staff details on our website where appropriate)
- the prevention and detection of crime and assisting investigations carried out by relevant authorities
- dealing with disciplinary matters
- dealing with complaints

F. Automated decision making

The University does not use your personal data for making any automated decisions about you.

G. Who will we share your data with?

Your data will be shared internally within the University only with staff and departments that require the use of the data in order to administer your employment and provide University services to you. Staff within HR and Finance will have access to your data along with your line manager and heads of department.

Data including your personal and special category data will be shared externally where the University has a legitimate need to do so in fulfilling the contract with you or has a legal obligation to provide data. The following list provides examples of the most common occasions on which it may be necessary to share your data.

- Higher Education Statistics Agency (HESA) requires the University as part of its regulatory obligations to provide anonymised and aggregated sensitive personal data. Further details of the staff data collection undertaken by HESA can be found at: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>
- HMRC and other government bodies in connection with your employment at the University.
- The Home Office with regards checking you are legally entitled to work in the UK.
- Pension fund administrators as appropriate to manage the pension accounts of members of staff.
- References to potential employers and other education institutions where the staff member has named the University or a staff member as a referee.
- Professional bodies where appropriate to validate University provision.

- Your data may be used in anonymised form to provide statistical information about the University's workforce for use on the University website and other appropriate publications.
- We will provide information to the police and other enforcement agencies in the event of an emergency or where required to assist the prevention or detection of crime.
- Some staff data is held on a secure, hosted server owned and managed by our HR System provider, MHR Global. MHR Global will not pass on your data to any third party unless it is legally required to do so.
- Health Assured, Occupational Health Service at Leeds University and Sodexo for health, well-being, and benefit provision.
- We will provide, if required, information to authorised government agencies and contact tracing schemes (such as NHS Test and Trace in England) in connection with COVID-19 or other crisis management scenarios.

H. Changes to your personal data

It is your responsibility to notify the University as soon as possible if any of the data held about you is incorrect or needs to be updated. The University provides a facility for staff to check and update their personal details through the MyView system.

I. Will your personal data be sent or stored abroad?

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 personal data is processed by one of our software suppliers who is based outside the EEA or who uses data storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred 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.

J. How long do we keep your personal data?

The University will retain personal data for no longer than is necessary to fulfil its contractual and regulatory obligations in line with our retention schedule details of which are available [here](#).

K. How you can access personal information the University holds about you and other rights you have

1. The right to be informed

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

2. Right of access

You have a right to access the personal data that the University holds about you. A request to see the personal data held by the University can be made through a Subject Access Request. Further information about how to request this is available [here](#).

3. The right to rectification

You have the right to have inaccurate personal data held by the University rectified or completed if it is incomplete. This can be done through MyView or by contacting HR at: HR@leedstrinity.ac.uk.

4. The right to erasure

Once personal data collected by the University is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased. The University manages the retention period of data held through its retention schedule.

5. The rights to restrict processing and to object to processing

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

6. The right to object to processing

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

The University will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

7. Rights to data portability

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. The University will respond to any Subject Access Requests in compliance with this. Further information about how to request this is available [here](#).

Note:

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

L. Contact us

If you have any queries about this privacy policy or how we process your personal data you can contact us at: HR@leedstrinity.ac.uk.

M. Questions or concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer. If you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately) or if you would like to complain about how the University has used your personal data, please contact the University's Data Protection Officer at dataprotection@leedstrinity.ac.uk or write to

Data Protection Officer
Leeds Trinity University
Horsforth
Leeds

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Should you be dissatisfied with our handling of your concerns, you have the right to complain to the Information Commissioner at <https://ico.org.uk/concerns/handling>.

N. Evaluation and review

This policy will be formally reviewed every year by the Data Protection Officer and the relevant department(s) within the University. In addition, the effectiveness of this Policy will be monitored as necessary on an on-going basis to ensure it is compliant with relevant legislation.

This policy was last updated in May 2023.