

**DATA PRIVACY NOTICE**  
**Information for potential, current and former employees;  
casual workers and consultants**



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# DATA PRIVACY NOTICE

## Information for potential, current and former employees; casual workers and consultants



### 1. Introduction

UCA takes its obligations with regard to data protection seriously. As such, we are providing this notice (“**Privacy Notice**”) to you so that you are provided with information about how UCA collects and processes your personal data. Please read this Privacy Notice, as it contains important information which you should be aware of.

For the purposes of this Privacy Notice, “**UCA Employees**” (“**you**” or “**your**”) means the employees of UCA (including staff, temporary workers, consultants and prospective employees) and “**UCA**” (“**we**”, “**us**” or “**our**”) a company incorporated in the UK - “**UCA**”) which employs you and also includes all our subsidiary businesses.

UCA is the data controller with regard to the processing of your Personal Data (as defined below), unless specifically stated otherwise.

This data collection notice is in accordance with General Data Protection Regulation (GDPR), in effect from 25<sup>th</sup> May 2018. The University is registered with the Information Commissioner’s Office (ICO) for the purpose of Data Protection. The University’s Data Protection Policy can be found <https://www.uca.ac.uk/data-protection-policies/>

This notice is for all University staff and explains the purpose for which UCA holds information about you (i.e. your personal data).

‘Personal data’ means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. (Article 4 - GDPR, 2018)

Staff Personal Data is kept in accordance with the University’s Data Protection Policy and GDPR 2018 and is kept securely and used only for legitimate purposes in connection with your employment.

If you wish to obtain further information about the University’s registration, it can be viewed at the [Register of Data Controllers](https://ico.org.uk/ESDWebPages/Entry/Z6218018) <https://ico.org.uk/ESDWebPages/Entry/Z6218018>

Further information can also be obtained from the [Information Commissioner’s Office](#).

### 2. Legal basis for processing data

Most of the Personal Data we collect from you is required to enable us to meet statutory obligations, enter into an employment contract and maintain our contractual obligations to you (legal), appraise your work performance within your role and provide necessary support and facilities that will enable you to carry out your work duties (duty of care). For example, UCA needs to process your Personal Data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer various entitlements. The provision of this data is part of the contract you form with the University when you accept an offer of employment.

In some cases, the University needs to process Personal Data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's entitlement to work in the UK, to deduct tax, to comply with Health and Safety laws and to enable employees to take periods of leave to which they are entitled.

The University may process Personal Data relating to criminal convictions if your employment requires a Disclosure and Barring Service (DBS) check or your conviction is not spent. Particular safeguards will be put in place for the collection and processing of special categories of data and criminal convictions.

More information in respect of the legal basis for processing your Personal Data is included at **Appendix Two**.

### **3. Why do we collect data?**

The University needs to collect, retain and process information about you (including Personal Data) for reasons related to recruitment or your employment by the University.

For example, the University collects and processes Personal Data for the following reasons:

- To recruit staff
- To manage your employment with the University including payroll and pension processing
- To comply with statutory obligations and duties i.e. Public Sector Equality Duty, Health and Safety reporting, HRMC notification etc.
- To manage the security of University and access to premises and facilities.
- Other planning activities that fall within the pursuit of the University's legitimate business.

More information in respect of the reasons for processing your Personal Data is included at **Appendix Two**.

### **4. What data do we collect and process?**

"**Personal Data**" is information which (either on its own or in combination with other information UCA holds) allows UCA to identify a UCA Employee and thus enable us to manage our relationship with UCA Employees.

More information in respect of the Personal Data we collect is included at **Appendix One**.

### **5. How is data collected?**

Personal Data will primarily be collected from you directly. For example through job application forms, CV's, Passport or other identity documents such as driving licence: from forms completed by you (such as emergency contacts) or through interviews, meetings or other assessments.

Some Personal Data may, where lawful to do so, be collected by UCA from third parties (e.g. previous employers or from criminal records checks permitted by law) or publically available information about you (e.g. from a social media account if this has been made publically available by you), which UCA has access to.

Please note that you are under no obligation to provide UCA with your Personal Data, however, not providing such data could prevent UCA from commencing your employment or performing certain obligations contained in your employment contract.

## 6. Data storage

Data will be stored in a range of places, including your personal file, in the University's HR management system, recruitment system and in other IT systems (including the email system).

## 7. Processing Personal Data

The term "**processing**" means any action taken, also with the help of electronic means, in connection with Personal Data, including collection, handling, use, transfer and disclosure by transmission, dissemination or otherwise making available, as well as recording, organisation, storage, retention, adaptation or alteration, access, retrieval, consultation, alignment or combination, blocking, anonymising, erasure, disposal or destruction.

The University has legitimate reasons for processing Personal Data before, during and after the end of the employment relationship. UCA processes Personal Data about you for a number of purposes, and a detailed list of these purposes is at **Appendix Two**.

**Please note:** this list may be updated from time to time and we will provide notice as and when such updates are made.

The University operates a CCTV system around its campuses, the purpose of which is to create a safer environment for staff, students and visitors to the University. It is likely to capture images of staff.

CCTV is not used for routine monitoring of staff and images are only used in circumstances that the University could not ignore where there is a risk of or actual criminal activity, where there is gross misconduct alleged or undertaken or where behaviours of staff put others at risk.

Subject to applicable local laws, UCA may also process Personal Data for other legitimate business purposes including management analysis, audits, financial forecasts, business planning and transactions, ensuring its compliance with applicable laws, regulatory requirements and UCA policies, and dealing with legal claims and record retention obligations and other related administrative activities. UCA may also use Personal Data to establish or exercise its legal rights and to comply with law enforcement or other government agency requests or court orders.

Save in relation to special category data (see below), the Processing of your Personal Data as described above, is conducted on the lawful basis that it is either:

- a) necessary for the purposes of complying with any legal obligation or exercising any legal right;
- b) necessary for the purpose of legitimate interests pursued by us;
- c) necessary for the performance of a contract with you; and/or
- d) for the purposes of performing any task that is in the public interest.

More detailed information in relation to the lawful basis for Processing your Personal Data is at **Appendix Two**.

The University will routinely publish some sources of information about the University that include Personal Data. These may include staff work telephone / email directory, graduation programmes and audio-visual representation for graduation ceremonies, prospectuses, annual reports, newsletters and staff profiles on the University website.

## 8. Special Categories of Data

Your Personal Data may include 'special categories of data' as described under the GDPR.

Examples of such special category data include the following:

- Racial or ethnic origin
- Political opinions, religious or philosophical beliefs,
- Sexual preference
- Genetic / biometric data for the purposes of uniquely identifying a natural person
- Political opinions
- Trade union membership
- Physical or mental health or condition
- Criminal offences or allegations

Consent will be requested to Process this data at the time of collection although we do not require your consent to process this information in certain circumstances.

Your special category data may be processed to meet local law requirements, such as government monitoring, statistical and regulatory purposes and/or for tithing purposes (in the case of religious information), or in order to pay dues to a Trade Union as requested by you.

The University may also Process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief which is done for the purpose of equal opportunities monitoring only and to provide anonymised statistical reports.

The Processing of your special category data as described above, is conducted on the lawful basis that it is either:

- a) necessary for the purposes of complying with any legal obligation in relation to your employment with us;
- b) to protect your vital interests or the vital interests of another individual;
- c) where necessary for the provision of medical or counselling services;
- d) as otherwise legally required; and/or
- e) otherwise only with your explicit consent (which we will obtain at the point of collecting the data from you and which may be refused or revoked at any time).

There may be circumstances where UCA will need to share some special categories of your Data with work colleagues within UCA. For example, the Occupational Health Service may seek information from departments or share information with Human Resources about fitness to work.

More detailed information in relation to the reasons that we may Process your special category data, and our basis for doing so, can be found at **Appendix Three**.

## 9. Who will your Personal Data be disclosed to?

Within the University, Personal Data may be shared between colleagues who legitimately need the information to carry out their duties.

Registration with IT Services means that a member of staff's name, department/section, email address and telephone number will appear in the University's internal email and telephone directory. This information may also appear on externally facing departmental webpages.

Staff photographs are used on the University Campus Card for the purposes of identification and security. The University may occasionally commission photographs around Campus or at specific University events which could include images of staff for inclusion in promotional material.

The University may monitor computing use through user names and log-ins to ensure adherence to the Acceptable Use Policy or for statistical purposes.

The University is required to obtain information about past criminal convictions as a condition of employment for certain posts. The University also undertakes DBS checks on those staff who work with young and/or vulnerable people.

Staff Personal Data may be processed for academic research purposes on the basis that the results of the research will not lead to decision-making about an individual or groups of individuals. Where a researcher wishes to use sensitive personal data, such as ethnicity, explicit consent will be sought in advance from the individuals concerned.

The amount of personal information shared within the University will be no more than is reasonably necessary.

## **10. Disclosure to third parties**

UCA may otherwise disclose Personal Data to third parties that are performing services under contract for UCA, such as payroll service providers, IT hosting and/or maintenance providers. Personal Data may also be disclosed upon lawful request by government authorities, law enforcement and regulatory authorities, where required or permitted by relevant local law and/or for tax or other purposes for example the Higher Education Statistics Agency (HESA), Her Majesty Revenue and Customs (HMRC). Further, Personal Data may be disclosed to third parties in response to legal process and when required to comply with laws, or to enforce UCA's agreements and corporate policies or to protect the rights, property or health and safety of UCA, its employees, agents and/or others, as well as to parties to whom the relevant UCA Employee has authorised UCA to release his Personal Data.

### International data transfer

Where a UCA Employee is required to study or attend a placement at another organisation it may be necessary for UCA to transfer personal data to the external university or employer, whether this is within the UK or abroad. For this reason, your personal information may be transferred to, and stored, and otherwise processed in, one or more countries outside of the European Economic Area ("EEA"). The jurisdiction of other organisations outside the EEA may not have adequate data protection laws equivalent to those in place within the EEA. For transfers of your personal data to third parties outside of the EEA, we take additional steps in line with data protection laws. These include EU Commission approved forms of contract with the relevant recipient(s) of your personal information. In addition, we will take reasonable steps to ensure that your personal information is adequately protected in accordance with the requirements of the UK data protection law.

UCA may also, where permitted (and having obtained any necessary consents as may be required by law), disclose Personal Data outside of the EEA for the purposes noted above in respect of UCA, or:

- where required as matter of law (for example, to tax and social security authorities);

- where required to protect UCA's and/or other UCA group companies' legal rights (for example, to defend against litigation);
- for talent management of senior staff, where to transfer the Personal Data would not cause an unwarranted prejudice to the rights and freedoms of the UCA Employee; and/or
- for such other purposes as are notified by UCA from time to time.

#### Statutory requirement

UCA also has a statutory requirement to disclose staff personal data to the Office for Students (OfS) and the Higher Education Statistics Agency (“HESA”) and/or their nominees/successors. In processing your personal data, OfS and HESA will be acting as data controller please refer to the websites and any relevant privacy policy of OfS and HESA at <https://www.hesa.ac.uk/about/website/privacy> <https://www.officeforstudents.org.uk/> (respectively) for further details on how your personal data will be used by them. This policy only relates to the use of your data by UCA. UCA is not responsible for the Processing of your Personal Data by OfS and HESA, when acting in its capacity as a data controller.

### **11. Security of your Personal Data**

As stated above, UCA takes the protection of your Personal Data seriously and we have implemented technical, physical and organisational measures to ensure the Personal Data (and Special Category Personal Data) of UCA Employees is kept accurate, up to date and protected against unauthorised or accidental destruction, alteration or disclosure, accidental loss, unauthorised access, misuse, unlawful processing and/or damage.

### **12. Data Retention**

UCA will retain your Personal Data only for such period as is necessary to perform the purpose(s) for which it was collected. In many cases this means that Personal Data will be retained for the duration of your employment with us and then for a reasonable time thereafter in order to manage our relationship with you, defend any claims, for tax purposes and/or for any other record keeping purposes. Almost all your personal data will be destroyed securely 6 years after you leave the University. We keep a limited permanent record of your attendance i.e. jobs you undertook and any personal achievements/awards so that we can verify this as needed and for archival purposes. More information about how long we keep your personal data and why is detailed in our retention policy.

In relation to prospective employees, with your consent, UCA will retain a copy of your CV on a recruitment database for up to 6 months so that we may contact you in relation to any future roles for which we consider you may be suitable. You may refuse to give your consent to this retention at the point of providing your CV or (where your consent is given) you may revoke it at any time. However, without your consent, UCA will not be able to consider you for any future vacancies unless you submit a separate application form/CV at the time.

### **13. Automated decision making**

We do not take any decisions about you that would affect your application for employment based solely on automated processing or profiling.

### **14. Your Rights**

Under GDPR (2018) as a data subject, you have a number of rights:

- access and obtain a copy of your data on request;

- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal grounds for processing.

You have an additional right of data portability where the Personal Data we use is processed automatically based on your consent or for the purposes of performing our contract with you. You can ask us to provide your Personal Data in a structured, commonly used and machine-readable format to you or to a third party, as instructed by you.

If you would like to exercise any of your rights of access, erasure, rectification, cancellation and/or opposition or if you have any questions about this Privacy Notice, please contact Angela Fisher, Director of Human Resources at:

Department:	Human Resources
Phone number:	01252 892673
Email address:	afisher@uca.ac.uk
Address:	UCA, Falkner Road, Farnham Surrey GU9 7DS

If you believe that any information UCA holds about you is incorrect or incomplete, please write to or e-mail the Director of Human Resources at the above contact information to advise us of the correct information as soon as possible. UCA will take steps to seek to correct or update any information as necessary and in accordance with applicable law and pursuant to its checks on whether that information is in need of correction or update.

If you believe that the organisation has not complied with your data protection rights, you can contact the Information Commissioner.

## **15. Your responsibilities**

Under GDPR 2018, you have some obligations under your employment contract to provide the University with data. In particular, you are required to report absences from work and may be required to provide information about other matters under the implied duty of good faith. You may also have to provide the organisation with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

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

You have a responsibility to keep your personal details accurate and up to date and should notify the University of any changes.

Staff at the University may, during the course of their employment, have access to personal data about other individuals. Staff are expected to treat any personal data relating to other people which may be accessed whilst at the University in a responsible and professional manner, in line with the University's Data Protection Policy. This responsibility is in addition to any obligations arising from professional ethics or codes of conduct.

Information obtained in the expectation of a duty of confidence should be treated confidentially and generally not disclosed without the data subject's consent.

The University will take a serious view of any breach of GDPR 2018 and data protection regulations by any of its members, including the consideration for disciplinary action.

## **16. Updates to this Privacy Notice**

UCA may change this Privacy Notice from time to time in order to reflect changes in the law and/or its privacy practices. When this happens and where UCA is required to do so by law, it will provide you with a new and/or updated Privacy Notice detailing how the use of your Personal Data is changing and, if necessary, obtaining your consent for the further Processing, as may be applicable.

If you have any questions about this Privacy Notice, please the Director of Human Resources using the above contact information.

## **17. Data Protection Officer and contact details**

Data Protection Officer:

Marion Wilks, University Secretary

Phone: +44 (0)1252 892603

Responsibility: Data Protection Policy Notification. Advising on policies relating to third parties

Data Control Officers:

Angela Fisher, Director of Human Resources

Phone: +44 (0) 1252 892673

Responsibility: Advising on policies relating to staff data

Andrew Penman, Head of Student Administration & Deputy Registrar

Phone +44 (0) 01252892712

Responsibility: Advising on policies relating to student data

## APPENDIX 1

### Categories of personal data

#### Type of personal data

##### a) Contact Information

- Name(s)
- Address(es)
- Email address(es)
- Contact details including mobile telephone number(s)

##### b) Personal Information

- Date of birth
- Gender
- Next of kin or other dependants
- Marital or relationship status
- Lifestyle and social circumstances
- Emergency contact information

##### c) Identity and Background Information

- Details of education and qualifications and results
- Career history, experience and skills
- Passport information
- Driving licence information
- Psychometric test results
- Right to work, residency and/or other visa information (where unrelated to your race or ethnicity)
- Curriculum Vitae (CV) or resume and professional profile
- Image or photographs
- Application form
- Evaluative notes and decisions from job interviews
- Preferences relating to job location and salary
- Conflicts of interests (including where related to family networks)

##### d) Financial Information

- Bank account details
- Salary, compensation and other remuneration information
- National insurance number and/or other governmental identification numbers
- Business expense and reimbursement details
- Company stock options and purchase plans

##### e) Special Category Personal Data

- Racial or ethnic origin (including your nationality and visa information)
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Biometric data (including fingerprint and retinal scans)
- Data concerning physical and/or mental health (including occupational health requirements, accident reports, day-to-day health concerns such as diabetes or epilepsy conditions which we should be aware of, dietary requirements, allergies, drug and alcohol test results and reasons for any short term or long term absence)
- Sexual orientation
- Health and safety and accident records and reports
- Information relating to actual or suspected criminal convictions and offences

## Type of personal data

### f) **Employment Administration Information**

- Terms and conditions of employment
- Work related contact details (including location and office and corporate phone numbers)
- Image/photographs
- Holiday and other leave related records
- Your working preferences and feedback in relation to the University and our staff
- Your preferences in relation to our use of your personal data
- Hours worked and working time preferences
- Statutory and non-statutory leave and absence records
- Job termination details

### g) **Job Performance Information**

- Role responsibilities
- Personal development reviews and appraisals, and associated feedback
- Training records
- Attendance information, including clocking in/out systems or timesheets
- Promotion application and/or outcome records
- Transfer and secondment information
- Academic and research publications

### h) **Investigation, Grievance and Disciplinary**

- the University investigations records
- Grievance and disciplinary records
- Employment tribunal records

### i) **Travel and Expenses Information**

- Transaction records
- Visa, passport and insurance details
- Flight and accommodation booking information
- Travel itinerary information

### j) **Benefits Information**

- Private healthcare, life assurance and pensions memberships for you and/or your dependants or other beneficiaries
- Death benefit information
- Season ticket loan records

### k) **Asset, Systems and Platform Usage and Communications Information**

- Computer and phone records
- Access logs and usage records from document management systems and other University provided applications and technologies
- User IDs and password information
- IP addresses and other online and physical device identifiers
- Records of calls, messages and/or internet or other data traffic and communications

### l) **Security, Location and Access Information**

- Information (including image and biometric data) captured or recorded by electronic card access systems, CCTV and other security control systems

Purposes of processing personal data

For some processing activities, we consider that more than one lawful basis may be relevant – depending on the circumstances.

Purposes of processing		Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
<b>a) Recruitment and workforce planning</b>							
1.	Administering your application for a job with us and considering your suitability for the relevant role				✓		
2.	Obtaining, considering and verifying your employment references and employment history				✓		
3.	Reviewing and confirming your right to work in the UK			✓			
4.	Conducting verification and vetting, including criminal background checks and credit checks where required by law			✓			
5.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓					✓
6.	Making a job offer to you and entering into a contract of employment with you		✓				
7.	Identifying and assessing the University's strategic business direction and resourcing needs, current employees and areas for development				✓		
8.	Promotion and succession planning				✓		
9.	Analysing recruitment and retention objectives, processes and employee turnover rates				✓		

Purposes of processing		Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
10.	Developing, operating and collecting feedback on recruitment activities and employee selection processes				✓		
<b>b) General employment management and administration</b>							
11.	Communicating with you and providing you with information in connection with your employment or engagement with us from time to time		✓		✓	✓	
12.	Paying your salary, compensation and any other benefits pursuant to your contract of employment		✓				
13.	Calculating and administering taxation within payroll, and your entitlements to any statutory/contractual benefits (including statutory sick pay and workforce pension arrangements)			✓			
14.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us			✓	✓		
15.	General staff administration, including workforce management and facilities operations				✓		
16.	Managing our health and safety compliance obligations			✓			
17.	Paying you discretionary or non-contractual benefits				✓		
18.	Managing annual leave entitlement and records, and to administer related payments				✓		
19.	Managing absence records, contractual sick leave entitlement and administering related payments		✓		✓		
20.	Managing maternity, paternity, adoption, parental and dependants leave and (where applicable) pay			✓			

Purposes of processing		Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
21.	Contacting the appropriate person in the event of an emergency concerning you					✓	
22.	Administering our insurance policies				✓		
23.	Determining whether any adjustments are necessary to enable you to carry out your role		✓	✓			
24.	Preparing risk assessments to prevent future injuries in the workplace			✓			
25.	Carrying out performance reviews				✓		
26.	Allocating and assigning responsibilities as necessary for workload management purposes, and measuring staff utilisation				✓		
27.	Administering, recording and analysing training and training records				✓		
28.	Supporting the establishment and maintenance of staff directories				✓		
29.	Considering your continuous suitability for your role				✓		
30.	Providing details of your employment to a new or potential employer, bank or financial institution where requested by you	✓					
31.	Handling grievance and disciplinary matters, including investigating issues, considering appropriate resolution and mitigating actions and reviewing outcomes				✓		
32.	Responding to reference requests from your future potential employers				✓		
<b>c) Security and governance</b>							
33.	Monitoring the security of the University's physical premises and systems, networks and applications			✓	✓		
34.	Identifying and authenticating employees and other individuals including Safeguarding contacts				✓		

Purposes of processing		Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
35.	Establishing a network of emergency contacts for individuals in case of emergency				✓		
36.	Identifying, investigating and mitigating suspected misuse of the University's assets, systems and platforms			✓	✓		✓
37.	Ensuring compliance with the University's policies and procedures				✓		
<b>d) Legal and regulatory compliance and responsibilities</b>							
38.	Managing and administering our equal opportunities reporting			✓			
39.	Compliance with obligations under the contract of employment between you and the University		✓				
40.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities			✓			✓
41.	Responding to non-binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities				✓		
42.	Complying with disclosure orders arising in civil proceedings			✓			✓
43.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting the University's compliance with relevant legal and regulatory requirements			✓			✓
44.	Investigating, evaluating, demonstrating, monitoring, improving, reporting on and meeting the University's compliance with best practice and good governance responsibilities				✓		
45.	Responding to employment and industrial relations matters where permitted by applicable			✓	✓		✓

Purposes of processing			Lawful basis					
			We are permitted to process your personal data because...					
			1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
	law, including criminal investigations, grievances, arbitrations, negotiations, elections and strikes							
46.	Responding to binding requests from collaborative and commercial partners of the University.				✓			
47.	Responding to non-binding requests from collaborative and commercial partners of the University.					✓		
48.	Preparing and submitting applications to commercial and collaborative partners, Government agencies and non-departmental public bodies.					✓		
<b>e) Day-to-day business operations</b>								
49.	Implementing, adapting and enhancing systems and processes to develop or improve our business and/or make your job easier or more enjoyable					✓		
50.	Managing, planning and delivering our global business, sales and marketing strategies					✓		
51.	Supporting our diversity programmes and staff support networks and initiatives		✓		✓	✓		
52.	Publishing external facing materials for marketing and public relations purposes such as where we mention you in the context of the University's projects and initiatives in our marketing materials, social media posts and press releases					✓		
53.	Administering your travel and accommodation arrangements			✓	✓	✓		
54.	Liftshare Dashboard – contains data of individual user's car sharing activity.					✓		
55.	Supporting and maintaining our technology infrastructure			✓		✓		

Purposes of processing		Lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your consent</b> to the processing	2. It is necessary to perform your employment contract	3. It is necessary for us to comply with a legal obligation	4. It is necessary for our legitimate interests or those of third parties	5. It is necessary to protect your vital interests (or those of someone else)	6. It is necessary to perform a task in the public interest or in our official authority
56.	Supporting the sale, transfer or merging of part or all of our business or assets, or in connection with the acquisition of another business				✓	✓	

### APPENDIX 3

#### Purposes of processing special category personal data

Purposes of processing		Special category lawful basis					
		We are permitted to process your personal data because...					
		1. You have given <b>your explicit consent</b> to the processing	2. It is necessary for your/our obligations and rights in the field of <b>employment and social security</b> and social protection law	3. It is necessary to protect the <b>vital interests</b> of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of <b>legal claims</b>	5. It is necessary for reasons of <b>substantial public interest</b>	6. It is necessary for <b>preventive or occupational medicine</b> , for the assessment of the working capacity of the employee
a) <b>Recruitment and workforce planning</b>							
1.	Conducting verification and vetting, including criminal background checks and credit checks where required by law		✓			✓	
2.	Conducting background checks, verification and vetting which are not required by law but needed by us to assess your suitability for your role	✓				✓	
b) <b>General employment management and administration</b>							

Purposes of processing		Special category lawful basis					
		We are permitted to process your personal data because...					
		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest	6. It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
3.	Facilitating the administration of any private healthcare, life assurance/insurance, pensions initiatives and plans that we offer in connection with your employment with us		✓			✓	
4.	Managing absence records, contractual sick leave entitlement and administering related payments		✓			✓	
5.	Contacting the appropriate person in the event of an emergency concerning you			✓			
6.	Administering our insurance policies					✓	
7.	Determining whether any adjustments are necessary to enable you to carry out your role		✓				
c) Security and governance							
8.	Identifying and authenticating employees and other individuals	✓				✓	
9.	Identifying, investigating and mitigating suspected misuse of the University's assets, systems and platforms				✓		
d) Legal and regulatory compliance and responsibilities							
10.	Managing and administering our equal opportunities reporting					✓	
11.	Responding to binding requests or search warrants or orders from courts, governmental, regulatory and/or enforcement bodies and authorities or sharing information (on a voluntary basis) with the same				✓		
12.	Complying with disclosure orders arising in civil proceedings				✓		
13.	Investigating, evaluating, demonstrating, monitoring, improving and reporting on the University's compliance with relevant legal and regulatory requirements				✓		
14.	Responding to employment and industrial relations matters where permitted by applicable law, including criminal				✓		

Purposes of processing		Special category lawful basis					
		We are permitted to process your personal data because...					
		1. You have given your explicit consent to the processing	2. It is necessary for your/our obligations and rights in the field of employment and social security and social protection law	3. It is necessary to protect the vital interests of the data subject or another person you or they are physically or legally incapable of giving consent	4. It is necessary for our establishment, exercise or defence of legal claims	5. It is necessary for reasons of substantial public interest	6. It is necessary for preventive or occupational medicine, for the assessment of the working capacity of the employee
	investigations, grievances, arbitrations, negotiations, elections and strikes						
15.	Making reasonable adjustments as needed to help remove barriers faced by you in your role because of any disability you might have		✓				
16.	Delivering occupational health advice and services to you in relation to your role with us						✓
17.	Responding to binding requests from collaborative and commercial partners of the University.	✓				✓	
18.	Responding to non-binding requests from collaborative and commercial partners of the University.	✓				✓	
19.	Preparing and submitting applications to commercial and collaborative partners, Government agencies and non-departmental public bodies.	✓				✓	
e) <b>Day-to-day business operations</b>							
20.	Supporting our diversity programmes and staff support networks and initiatives	✓				✓	