

University of Hull

Privacy Notice: Staff and Applicant

Please click on the links below to see the information in each section of this Privacy Notice. Each link opens a new page.

In sections 4 and 5, the main text gives an outline of the processing activity and a symbol to show the legal basis of that processing.

From time to time we will make **changes to this Notice**. Significant changes will be notified to you using our main or most common method of communication with you. For current staff, we will communicate these changes to you via email. For job applicants, significant changes will be notified to you via email and on our jobs website. For former staff, then significant changes will be notified by email.

UoH's Data Protection Officer ("DPO") has oversight over data protection matters within UoH. If you have any questions about this Notice, or any queries or comments on the processing described in this Notice, you can contact the DPO on dataprotection@hull.ac.uk, 01482 466594 or University of Hull, Cottingham Road, Hull, HU6 7RX

Please tell us promptly about any changes to the data we hold about you. This is particularly important for your contact details. Current staff can do this through MyHR. For support contact: MyHR@hull.ac.uk

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UoH Privacy Notice: Staff and Applicants

1. Introduction

(a) What is this Notice?

In this Notice, UoH "we", "our" and "us" refers to University of Hull, Higher Education Corporation.

This Notice applies to people who:

1. Apply to work at UoH;
2. Currently work at UoH;
3. Academic or business visitors both from inside and outside the EEA;
4. Former UOH staff and spouses who are in receipt of pensions; and
5. Pension dependents and emergency contact details.

Former UoH staff and spouses who are in receipt of pensions.

We have separate Privacy Notices covering information relating to UoH Students, Student Recruitment: Enquiries, Events and Admissions, UoH Alumni, people participating in UOH research projects and people making enquiries or attending general public engagement events or connected to UoH.

Where we hold information in a form that identifies individuals, it is "personal data", often referred to as "data" in this Notice.

More information: The purpose of this Notice is to enable you to understand the scope of the personal data which UoH holds and uses that relates to you personally, and how this data will be handled by us. It covers use of your information within UoH and the circumstances in which we will share your data with other organisations.

We think it is important that you can understand our uses of your data. In addition the data protection laws require us to be transparent about how we process your data, and they set legal requirements to give you specific information.

Because of this, and because UoH is a large organisation which needs to collect and use personal data for a range of purposes, this Notice is quite long and it contains some legal terminology. We have tried to make the Notice as clear as possible and provide useful signposting so that you can find the information most relevant to you. See section (c) below for guidance on how to use the Notice.

(b) What is data protection? Personal data is information relating to identifiable living individuals (known as "data subjects"). Use of personal data (including collecting data, sharing data or just

holding it in files) is referred to as “data processing”. To protect your privacy, organisations do not have complete freedom in how they use your personal data. They have to comply with data protection laws, which apply restrictions on when and how personal data can be processed. Processing of personal data is lawful only where it meets certain requirements or conditions which relate to the purpose of the processing and how it is carried out.

More information: The Data Protection laws were set out in the Data Protection Act 2018 and the EU General Data Protection Regulation (called “GDPR”).

Under these laws, UoH is the data controller of the information it collects and processes as described in this Notice. This means that it has the core legal responsibility to safeguard the information and ensure it is processed lawfully.

In particular UoH must:

- Take steps to ensure that the data it processes is accurate and up to date;
- Give you clear information about its processing of your data, in one or more Privacy Notices like this one;
- Only process your data for specific purposes described to you in a Privacy Notice, and only share your data with third parties as provided for in a Privacy Notice; and
- Keep your data secure.

Information about your data protection rights as a data subject is set out in section 7 of this Notice.

(c) Using this Notice







Sections 4 and 5 of this Notice identify and explain the data processing and data sharing carried out by UoH.

In these sections, against each description of a data processing or sharing activity you will automatically see a summary description of the processing and a colour-coded indicator of the legal basis of the processing (these are explained below). This first level of information will also include any specific processing activities which we particularly need to highlight to you. In some sections, you can then choose whether to click through to see a more detailed layer of information about the processing and its legal basis.

(d) Understanding the legal basis for processing of your data







UoH is using colour coding to provide a quick, easily-accessible indication of the legal basis for processing. This section explains how the colour coding in this Notice links to conditions set out in the GDPR: references to Articles are to the relevant provisions within the GDPR. The conditions listed here are those which UoH is relying on in relation to the processing covered by this Notice and may not be a complete list of all available conditions under the data protection legislation.

More information: Conditions of processing for any personal data

	Necessary for the performance of a contract between you and UoH or to take specific steps before entering into a contract: this will be either the core contract between us relating to your employment at UoH or application for employment at UoH, or an additional contract for other services, for example an additional contract between you and UoH
	UoH has a legal obligation to do so to ensure compliance.
	Necessary for the performance of a task carried out in the public interest: this would usually be an activity within UoH's core purpose as a statutory higher education corporation, to deliver higher education and carry out research, but might refer to a public interest task pursued by another organisation.
	Consent: this means that you have agreed that we can use your data for this specific purpose. You are able to withdraw your consent at any time.
	Necessary for legitimate interests pursued by UoH or another organisation, where UoH has determined that the processing represents an appropriate balance between its aims and your interests, rights and freedoms as a data subject.
	Necessary to protect your vital interests or those of another person, i.e. to prevent or manage significant risks of harm.

More information: Additional conditions of processing for special category data

One of these must apply if we are processing any information about your protected characteristics including, racial or ethnic origin, religious beliefs, trade union membership, health or disability or your sexual orientation. These are referred to as “special categories” of data in the data protection legislation. The conditions referenced in this Notice are:

	Explicit consent: this means that you have explicitly agreed that we can use your personal data for this specific purpose. You are able to withdraw your consent at any time. Consent can be withdrawn at any point.
	Necessary to protect the vital interests of you as the data subject or another person, where you are physically or legally incapable of giving consent.
	Necessary for the purposes of substantial public interest.
	Necessary for establishment, exercise or defence of legal claims.
	Necessary for purposes of carrying out obligations and exercising rights in relation to employment, social security and social protection law.
	Necessary for research or statistical purposes, where it is considered that the use of your data will be proportionate to the aims of the research and that your interests as a data subject will be appropriately safeguarded.

UoH Privacy Notice: Staff and Applicants

2. When and how we collect your data

• Information we collect and hold about you

We collect and hold information provided by you through:

Your application form, Equality Monitoring form and other information you provide to us through the application and recruitment process; and

If appointed, we will collect additional personal information in the course of your job-related activities throughout your engagement with us.

If appointed, you will provide and UoH will receive data about you in respect of the work you undertake for us and your communications with UoH staff, students and other individuals as part of your role at UoH

We will also obtain information about you in other ways, for example from third parties such as the Disclosure and Barring Service, UK Visas and Immigration service (part of the Home Office), any recruitment agent acting on your behalf and from people you identify as referees in your application form. Where data protection legislation applies to these third parties, they should provide separate privacy information which covers their sharing of your data with UoH.

Data categories

The data we collect about you includes the following categories:

- Recruitment information (including your name, title, addresses, telephone numbers, and personal email addresses; qualifications and work experience, copies of right to work documentation, references and other information included in your application form, Equality Monitoring forms, a CV or cover letter or as part of the application process). Such as you:

Date of birth;

Bank details and information about your tax status and pension;

Marital status and dependants;

Proof of your identity, qualifications and right to work

National Insurance number;

HESA Identification Number (if previously employed by a Higher Education Institution);

Emergency next of kin contact details;

Start date and, if different, the date of your continuous employment; and

Location of employment or workplace.

- Information relating to your salary, annual leave, pension, benefits and any other payments between you and us.

- If you drive a vehicle on UoH business, a record of you having a valid driving licence and business insurance cover.

- **ORC ID – Research ID Number**

- Employment records and data collected at recruitment (including job titles, work history, working hours, variations to terms and conditions, flexi-time, leave, sabbaticals, career breaks, paternity, maternity, adoption and other family leave, training records - including details of whether you have completed mandatory UoH training relevant to your post at UoH – and any professional memberships).

- Appraisal information.

- Pay progression and/or promotion information.

- Information relating to any matters or complaints raised and investigated under UOH Policy, such as the Absence Management Policy, Dignity and Respect (Harassment) Policy, Disciplinary Procedure, Grievance Procedure and Performance Framework (Support and Development).

- CCTV footage and other information obtained through electronic means such as smart card records.

- Information about your use of our information and communications systems.

- Photographs.

- Your communications with UoH staff, UoH students and other people (including any opinions about you or made by you about another person).

- When you leave UoH, your leaving date and your reason for leaving including any notes from the exit interview. This includes exit interview and questionnaire

- Any Settlement Agreement which may be in place with regard to ending your employment.

- Redundancy information.

- Dismissal information.

- Details of any request you make to us and our handling of it, such as under the Freedom of Information Act 2000 or under the data protection laws.

- Information relating to proposed or actual litigation involving you and UoH.

- **Special Category and criminal convictions data**

The data we hold about you also includes some special category and criminal offences data, which is subject to extra protections under data protection laws. These are identified below and explained in sections 4 and 5 of this Notice:

- Information about criminal convictions and offences.

- Information about your race or ethnicity, religious beliefs and sexual orientation

- Trade union membership.

- Information about your health, including any medical condition, health and sickness records, including:

- o occupational health referrals and reports
- o where you leave employment and the reason for leaving is determined to be ill-health, injury or disability, the records relating to that decision;
- o information required for medical physicians and / or pension providers; and
- o details of any absences (other than holidays) from work including time on sick leave, statutory / family leave.

UoH Privacy Notice: Staff and Applicants

3. How we hold your data

Data relating to your job application and our communications with you at that stage is held within our internally hosted database and relevant electronic files which are secured with permissions.

UoH uses an internally hosted electronic staff record system for staff records.

More information: There is an individual account for each current and former member of UoH staff. The information held includes information such as your name, title, addresses, telephone numbers, and personal email addresses, qualifications, job title, salary, payslips, your bank details and next of kin details and other key aspects of your employment contract with UoH.

Records about you are accessible to UoH staff to the extent that they require access for the purposes of their role within UoH and to fulfil our employment duties with you.

Some types of information which are held within HR will also be separately held in electronic and/or hard copy by the Faculty or Professional Service in which you work including information about any appraisal and development matters and any additional support needs you may have.

Your personal and special category data will also be held in electronic and/or hard copies within files and email folders in individual UoH administration departments as appropriate. This includes information held by our Human Resources (HR), Health and Safety Services and Payroll teams, Estates (Parking Permits) in relation to the services they provide to you and to UoH, and your interactions with them. It will also include any information generated through your decision to access additional services provided by or through UoH such as the Employee Assistance Programme, Staff Benefit Schemes and development.

4. How and why we process your data for UoH purposes

Each section below refers to a different category of data processing for purposes which are determined by UoH. You can click on the description to see more information about the processing and the legal basis for it.

RECRUITMENT AND SELECTION

All of the information you provide during the application process will only be used by UoH for the purpose of progressing your application or to fulfil any necessary legal requirements. Any information gathered as part of recruitment involving the help of third parties, e.g. recruitment agencies, will be retained by them and disposed of by them in line with the data processing agreements we have in place with them and that organisation's own privacy policy.

Records about you are accessible to UoH staff to the extent that they require access for the purposes of their role within UoH and to fulfil our employment duties with you.






The contact information you provide will be used to contact you to progress your application. All other information provided will be used to assess your suitability for the role applied for against the selection criteria.

You will be asked to complete an equality monitoring form – this is completely voluntary. The information will not be shared with the interview panel and only used to evaluate how well we are eliminating discrimination and advancing equality. This information will not be used as part of the selection process.     

More Information: The data will be processed within UoH's HR team and , with the exception of data forming part of the Equality Monitoring Form, will be shared with relevant individuals forming part of the interview panel and administrators within UoH's Faculties and Professional Services and external panel members for professorial roles.

Your data will also be processed by our internal Occupational Health team, and in anonymised form with UoH's Equality, Diversity and Inclusion Team and for some posts the Disclosure and Barring Service and Home Office.


We will use the contact details you provide to us to contact you, any recruitment agent acting for you and your designated referees as required to progress your application. We will use the other information that you, any recruitment agent acting for you and your designated referees provide to us to assess your suitability for the post against the pre-determined person specification criteria. Our HR team and the recruitment panel will have access to all of this information.

-  To allow us to take steps in anticipation of entering into a contract of employment with you and to perform any contract entered into with you.
-  Necessary for legitimate interests pursued by UoH in assessing your application and in providing assurance and meeting UoH policies in relation to recruitment.
-  Necessary for establishment, exercise or defence of legal claims.
-  Necessary for research or statistical purposes,
-  Necessary for compliance with legal obligations on UoH as a prospective employer.

CURRENT AND FORMER STAFF

UoH will process (your data) in connection with the operation of UoH as a higher education corporation and in our capacity as your employer in accordance with our prevailing policies and procedures. Further details about some of the key areas of processing are set out below. For some of our processing activities, you will be provided with additional specific processing information at that stage.

More information: We will use staff data for all purposes associated with the administration of the employer/employee relationship. The purposes for which we may use staff data (including special category and criminal convictions data) we collect during an employee's association with us include:

- employment matters (e.g. promotion, development, conduct, attendance, appraisals, managing progress & performance, grievance and academic misconduct investigations, disciplinary actions and complaints)    
- maintaining staff records    
- complying with visa requirements 
- administering finance (e.g. salary, pension and any other staff benefits)   
- providing support services (e.g. through the Employee Assistance Programme, Chaplain and Occupational Health Service)   
- providing library, IT and information services (please refer to the Acceptable Use Policy for information about IT monitoring)   
- complying with statutory requirements (e.g. monitoring equal opportunities and equal / genderpay, and processing and responding to subject access requests and information requests and complying with our obligations under our publication scheme)   
- carrying out research, surveys and statistical analysis (including using third party data processors to carry out benchmarking and surveys for us)  
- providing operational information   
- promoting our services and other operational reasons (including displaying staff details on our website where appropriate, handling external business calls via our reception team and our enquiry service and taking or commissioning photographs or films on campus or at UoH events for promotional purposes)   
- safeguarding and promoting the welfare of staff   
- ensuring the safety and security of our staff   
- preventing and detecting crime 
- dealing with complaints    
- carrying out audits 
- accessing staff email accounts to mitigate data breaches, providing staff access to accounts to those on sick leave and providing HR access when investigating complaints. 

The name, professional service or faculty, work email address and telephone number(s) for staff will appear in UoH's internal email and staff intranet directory. This information will be used by call handling staff to direct external calls and general enquiries accordingly. If a member of staff has any personal and / or safety concerns about the release of work related contact information they should contact the HR Partner team. Staff profiles for academic staff, senior staff and staff in roles that involve significant contact with external organisations and or members of the public will normally be available online in accordance with UoH's policy on the Disclosure of Information on Employees. ●●

Campus Facilities We process your information in a number of ways in order to manage the UoH estate (land and buildings). This includes:






Operation of CCTV systems. Data generated through the operation of these systems will in certain circumstances be shared with the police. ●●●●

CCTV systems are in place in some parts of UoH's estate for the purposes of ensuring a safe and secure environment, preventing crime and anti-social behaviour and facilitating the detection or prosecution of criminal behaviour. CCTV footage is processed in accordance with UoH's CCTV policies and procedures. Images are captured 24 hours a day, seven days a week. The CCTV systems digitally record seven frames per second. These images are automatically erased after a period of no more than 31 days after they are recorded, unless before that time we are made aware that the images are required for evidence (in which case they are securely stored until the incident is resolved or the information is passed to an official third party). Access to the footage is securely controlled by UoH's IT security arrangements. We may provide CCTV footage to the police where they believe that a crime has been or may have been committed and we are satisfied that the CCTV footage may assist them in their investigation and disclosure would comply with the data protection legislation.

Management of car parks and provision of parking permits. This includes sharing data with the third party provider of parking enforcement services. ●●

Your data is processed within UoH when we process any application you make for a UoH parking permits. A third party provider carries out monitoring and enforcement of the terms and conditions of use of UoH car parks. Separate privacy information about this processing is provided on the signs in UoH car parks and when you make any application for a UoH parking permit.

- Consent: this means that you have agreed that we can use your data for this specific purpose.
- To allow us to take steps to perform the employment contract with you.
- Necessary for legislative compliance by UoH as an employer.
- Necessary for legitimate interests pursued by UoH in our capacity as an employer and in assisting in providing a safe and secure environment for staff and students.
- Necessary for the performance of a task carried out in the public interest: this would usually be an activity within UoH's core purpose as a statutory higher education




















-  Necessary to protect your vital interests or those of another person.
-  Necessary for establishment, exercise or defence of legal claims.
-  Necessary for purposes of carrying out obligations and exercising rights in relation to employment, social security and social protection law.
-  Explicit consent: this means that you have explicitly agreed that we can use your personal data for this specific purpose. You are able to withdraw your consent at any time. Consent can be withdrawn at any point.
-  Necessary for research or statistical purposes, where it is considered that that the use of your data will be proportionate to the aims of the research and that your interests as a data subject will be appropriately safeguarded.

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5. Sharing your data with third parties

This section explains when and why we share your data with third party organisations for UoH and sometimes the third party's own purposes.

Unless an opt-out is in place, we will disclose limited staff data to a variety of recipients including:

- our employees, agencies and contractors where there is a legitimate reason for their receiving the information (including service providers such as our external IT support providers, our insurers and external legal and financial advisers)  
- Current, past or potential employers of our staff (to provide or obtain references with your consent) 
- Reference requests from letting agents, banks, mortgage companies (to provide references with your consent) 
- professional and regulatory bodies in relation to the confirmation of conduct including complaints, job description and information provided as part of the recruitment process   
- government departments and agencies where we have a statutory obligation or other legal basis to provide information (e.g. Her Majesty's Revenue and Customs (HMRC), the Higher Education Funding Council for England (HEFCE), the Higher Education Statistics Agency (HESA), the Home Office (in connection with UK visas and immigration) and the Office for Students (OFS))   
- The Disclosure and Barring Service (DBS) where we require a DBS check for certain roles  
- Third parties who work with us to provide staff support services (e.g. coaching and mentoring and occupational health services)   
- Third parties who are contracted to provide out-of-hours IT services for us 
- Other higher education providers or employers where the member of staff is taking part in an exchange programme or other collaboration as part of their employment   

- external organisations including funders and third party clients (for example, where our member of staff is named as part of a research application for external funding or is to be involved in providing consultancy services to an external organisation) ●●●
- crime prevention or detection agencies (e.g. the police, security organisations, Department for Works and Pensions and local authorities) ●●
- pension providers ●●○
- relatives/next of kin (but only where we have consent from the member of staff or there is a legitimate reason for the disclosure) ●●●
- healthcare, social and welfare organisations ●●●●
- representatives of a current, former or potential member of staff (but only where we have consent from the member of staff or there is a legitimate basis for the disclosure) ●●
- internal and external auditors ●●●
- debt collection and tracing agencies ●●
- courts and tribunals ●●
- local and central government ●●
- trade union and staff associations (where information is already in the public domain or we have consent from the member of staff) ●●●●
- survey and research organisations, for example the annual staff survey ●●●
- publications, press and the media ●●

We will send some of the staff information we hold to the Higher Education Statistics Agency (HESA). This does not include the name or contact details of staff as the data is coded when sent. HESA collects and is responsible for the database in which HESA staff records are stored. HESA uses that information in its own right – to publish statistics about staff in higher education, for example. HESA also processes the information held in the databases for other organisations. The data protection laws also apply to HESA.

If a member of staff provides us with information about their disability status, ethnicity, sexual orientation, gender reassignment, parental leave or religion, this will be included in the HESA staff record. This helps to make sure people are being given equal opportunities and to prevent unlawful discrimination. HESA will not use this information in any way to make decisions about you.

Non-routine data sharing in exceptional circumstances

We will share personal data with emergency services and/or the person you have identified to us as being your next of kin or emergency contact, where this is necessary to safeguard your position or that of other individuals. ●●●

More information: We will also share personal data with the police or other organisations with responsibility for investigating potential crimes such as fraud (e.g. local authority fraud investigation teams) where satisfied that this is necessary for the prevention or detection of crime. This may include sharing special category data such as health information.

- Depending on the nature of the situation which has arisen, sharing with the emergency services could include sharing information with the police, National Health Service organisations and the Fire Service.
- Disclosure is necessary to protect your vital interests, i.e. where you are at clear risk of harm, or to protect the vital interests of others e.g. if they are at risk of harm from your actions. We will only share special category data on this basis if it is not possible for us to obtain a valid consent from you to the disclosure.
- Where the police have told us, and we are satisfied that this is the case, that sharing your data with them is necessary for the purposes of preventing or detecting crime.
- Disclosure is necessary for the purposes of protecting you or others from risk of harm, or for prevention/detection of crime: these are purposes in the substantial public interest.

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6. Transfer of your data outside the European Economic Area (EEA)

Data protection laws limit our ability to transfer personal data outside the countries within the EEA (i.e. the countries which are subject to the same or very similar data protection laws). This is to help ensure that a consistent level of data protection applies to your data at all stages of processing, and that you are not exposed to additional privacy risks through the transfer of your data. Transfers of data outside the EEA are only permitted in certain circumstances.

Aside from these situations there may be a transfer of your personal data outside the EEA in the following circumstances:

- Where we use a cloud-based IT system to hold your data, and the data in the cloud is stored on servers located outside the EEA. In these circumstances we safeguard your data through undertaking appropriate checks on the levels of security offered by the cloud provider and entering into a contract with them which applies protections of the same type and level required by data protection laws within the EEA;
- Where you are based outside the EEA and we need to send you emails or other communications which are necessary for the performance of our contract with you or for implementing pre-contractual measures which you have asked us to take (e.g. processing your application or enquiry). In these circumstances the data protection laws say that transfer is permitted; or
- With your consent.

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7. Retention: how long will we keep your data for?

UoH is undertaking a review of its retention policies and future versions of this Notice will contain more specific references to retention periods for different categories of data.

We will aim to retain your personal data only as long as necessary for the purposes of the processing which are explained above, and any secondary purposes such as audit, regulatory and legal record-keeping requirements.

In general, we apply the following principles to determine how long we will keep your data:

- If you are not successful, the data held by us from the application process will usually only be retained by our HR team for 6 months from the end of the recruitment process for the post applied for.
- If you are successful, the data held by us from the application process will be retained by us as part of your employee file for the duration of your employment plus 6 years following the end of your employment.
- In cases where the University appoints a non EU member of staff, then in order to comply with UKVI requirements, data must be kept for either one year after employment or the date of the compliance/audit check by UKVI.

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8. Your rights as a data subject and how to exercise them

Under the data protection laws you have a number of rights in relation to our processing of your data. In summary these are:

- Right to request access to your data as processed by UoH and information about that processing (a “subject access request”)
- Right to rectify any inaccuracies in your data
- Right to request erasure of your data from our systems and files
- Right to place restrictions on our processing of your data
- Right to object to our processing of your data
- Right to data portability: where we are processing data that you have provided to us, on the basis of consent or as necessary for the performance of a contract between us, you have the right to ask us to provide your data in an appropriate format to you or to another controller.

Most of these rights are subject to some exceptions or exemptions, depending on the purposes for which data is being processed.

If you have any questions or concerns about our processing of your data, please contact the UoH Data Protection Officer (DPO):

Email: dataprotection@hull.ac.uk

Telephone: 01482 466594

Address: Data Protection, University of Hull, Cottingham Road, Hull, HU6 7RX

If you would like to exercise any of your rights as outlined above, you can contact the DPO as above or visit the Data Protection page on our website to access the relevant forms.

We will always aim to respond clearly and fully to any concerns you have about our processing and requests to exercise the rights set out above. However, as a data subject if you have concerns about our data processing or consider that we have failed to comply with the data protection legislation

then you have the right to lodge a complaint with the data protection regulator, the Information Commissioner:

Online reporting: <https://ico.org.uk/concerns/>

Email: casework@ico.org.uk

Tel: 0303 123 1113

Post:

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF