



EMPLOYEE PRIVACY NOTICE

Data controller: Norwich University of the Arts

Data protection officer: Helen Ogden, Compliance Manager

Norwich University of the Arts (the University) collects and processes personal data relating to its employees to manage the employment relationship. The University is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

How does the University protect data?

The University takes the security of your data seriously. The University has internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

Where the University engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

What information does the University collect?

The University collects and processes a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number, date of birth and gender;
- the terms and conditions of your employment;
- correspondence between you and the University;
- correspondence between the University and third parties on your behalf, for example a mortgage lender or letting agency;
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the University;
- information about your remuneration, including entitlement to benefits such as pensions;
- details of your bank account and national insurance number;
- information about your marital status and emergency contacts;
- information about your nationality and entitlement to work in the UK;
- information about your criminal record (where this is required for the role);
- details of your working pattern and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and other, and the reasons for the leave;
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence;

- assessments of your performance, including probation reviews and appraisals, training you have participated in, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the University needs to make reasonable adjustments;
- health and safety records (including accident reports) and security (including University-operated CCTV);
- information about trade union membership; and
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.

The University collects this information in a variety of ways. For example, data is collected through application forms, CVs; obtained from your passport or other identity documents such as your driving licence; from forms completed by you at the start of or during employment; from correspondence with you; or through interviews, meetings or other assessments.

In some cases, the University collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks where this is required for the specific role.

Data is stored in a range of different places, including in your personnel file, in the University's HR management systems and in other IT systems including email.

Why does the University process personal data?

The University needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, it needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer benefit and pension entitlements.

In some cases, the University needs to process 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. For certain positions, it is necessary to carry out criminal records checks to ensure that individuals are permitted to undertake the role in question.

In other cases, the University has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the University to:

- run recruitment and promotion processes;
- maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
- operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
- operate and keep a record of employee performance and related processes, to plan for career development and workforce management purposes;
- operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
- obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and

ensure that employees are receiving the pay or other benefits to which they are entitled;

- operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the University complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
- ensure effective general HR and business administration;
- ensure employees work in a safe and secure environment;
- provide references on request for current or former employees;
- respond to and defend against legal claims; and
- maintain and promote equality in the workplace.

Where the University relies on legitimate interests as a reason for processing data, it has considered whether or not those interests are overridden by the rights and freedoms of employees or workers and has concluded that they are not.

Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities and for health and safety purposes). Information about trade union membership is processed to allow the University to operate check-off for union subscriptions.

Where the University processes other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, this is done for the purposes of equal opportunities monitoring.

Who has access to data?

Your information will be shared internally, including with members of the HR team (including payroll), your line manager, managers in the area in which you work and IT staff 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, obtain necessary criminal records checks from the Disclosure and Barring Service (if required for the role) and the Home office, UK Visa and Immigration to meet the obligations as a visa sponsor.

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

We may disclose personal information to external bodies to fulfil our statutory and contractual responsibilities. Anonymised data is shared with the Higher Education Statistics Agency (HESA) for statistical analysis. (See the HESA website and HESA privacy notice).

The University will not transfer your data to countries outside the European Economic Area.

For how long does the University keep data?

The University will hold your personal data for the duration of your employment. The periods for which your data is held is set out in the University's retention schedule which is available on the University's intranet.

Your rights

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the University to change incorrect or incomplete data;
- require the University 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 University is relying on its legitimate interests as the legal ground for processing; and
- ask the University to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the University's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the University's Data Protection Officer, Helen Ogden, email dataprotection@nua.ac.uk.

If you believe that the University has not complied with your data protection rights, you can complain to the Information Commissioner.

What if you do not provide personal data?

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 disciplinary or other matters under the implied duty of good faith. You may also have to provide the University 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 other information, this will hinder the University's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

Changes to the employee privacy notice

The University will keep the privacy notice under regular review. This privacy notice was last updated in May 2018.