

Privacy Notice for Staff & Prospective Employees

We, the University College of Osteopathy (UCO), of 275 Borough High Street, London SE1 1JE, telephone number: +44 (0)20 7407 0222, the Data Controller for personal data relating to you that we process.

This Privacy Notice explains how we will process your personal data and your rights regarding the personal data we hold about you as employees of the UCO. This Privacy Notices extends to staff who may be appointed on short- or long--term contracts or who fulfil a contract for services and to job applicants.

Effective Date

This Privacy Notice is effective from: 25th May 2018.

The current version of this Privacy Notice can be found at <https://www.uco.ac.uk/policies-and-procedures>.

What information we collect

As a staff member or prospective employee of the UCO, we hold a range of personal data about you, some of which you provide to us direct and some of which we receive from third parties. Examples of categories of personal data which we may hold are:

- Your name and contact information, your date of birth, gender, national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality.
- Your photograph.
- Information relating to your education and employment history.
- Information relating to your employment history at the UCO and your ongoing performance at the UCO (e.g. annual Professional Development Review information, disciplinary and grievance information).
- Your attendance (e.g. annual leave arrangements and sick leave record).
- Your bank and pay details (e.g. payslips and P60s).
- Your pension and benefits information.
- Your next of kin and emergency contact information.
- Sensitive personal data, including information concerning your health and medical conditions (e.g. disability needs), trade union membership and/ or your racial or ethnic origin, religion or similar beliefs and sexual orientation (should you wish to provide this information).
- Information about criminal convictions and offences.

How we collect your information

We collect your data in a number of ways which include:

- From the information you provide us before joining the UCO, for example when you express an interest in working at the UCO and / or on your application form.

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- From the information you provide to us during the course of your employment.
- From third parties, including
 - your previous employer or individual who may provide a reference about you;
 - the Disclosure & Barring Service for information about criminal convictions where appropriate; and
 - any employment agent or other third party who may have been involved in your recruitment.

The purposes for which we process your personal data and the legal basis

We only process data for specified purposes and if it is justified in accordance with data-protection law.

The legal justification for the purposes for which we shall process your data is as follows:

a) Contract (the processing is necessary for a contract we have with you, or because you have asked us to take specific steps before entering into a contract).

Under this lawful basis we may use your personal information for the following purposes:

- To interact with you as part of the recruitment process.
- Once you have been appointed, to enter into and perform our obligations under our employment contract with you and exercise our rights.
- To provide you with facilities which are ancillary to your employment contract, such as the IT service, Library Services, and car parking provision.

b) Legal Obligation (the processing is necessary for us to comply with the law).

Under this lawful basis we may use your personal information for the following purposes:

- Complying with anti-money laundering laws and visa requirements.
- Managing our health and safety obligations.
- Managing obligations under Equal Opportunities legislation.
- Complying with statutory requirements (e.g. monitoring equal opportunities and equal pay, and processing and responding to subject access requests and information requests and complying with our obligations under our publication scheme, making external/statutory returns to the Higher Education Statistics Agency (HESA – please see HESA’s staff collection notice for further information about how HESA collect and process staff data here: <https://www.hesa.ac.uk/about/regulation/data-protection/notices>).
- To carry out audits.

c) Legal obligation and exercising specific rights of the controller in the field of employment law

Under this lawful basis we may use your sensitive personal information for the following purposes:

- To make reasonable adjustments for disabilities and providing relevant support for health concerns.
- To safeguard the UCO community, we may process information you provide about criminal convictions.

We may also process your personal data where it is necessary to protect your or another person's vital interest.

Who it will be shared with

On occasion we may need to share your personal data with certain internal and external third parties, including:

- Within the UCO, personal data may be shared with internal colleagues who legitimately need the information to carry out their duties, including ICT Services.
- Third parties who are contracted to work on its behalf, for example to pension providers, insurers or legal consultants.
- Auditors undertaking investigations or selected individuals acting on behalf of the UCO, such as organisations undertaking market research or academic researchers provided no personal data is published.
- Prospective employers in a reference.
- An external debt collection agency if the UCO has been unable to recover the debt by normal internal financial or HR processes.
- Where a member of staff's employment with the UCO requires study, employment, or a placement at another organisation it may be necessary for the UCO to transfer personal data to the external university or employer, whether this is within the UK or abroad. This may require some data being sent outside the EEA to countries which may have lower standards for the protection of personal data. In these circumstances, your personal data will only be transferred on one of the following bases:
 - 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; or
 - There exists another situation where the transfer is permitted under applicable law (e.g. where we have your explicit consent).

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- The Office for Students (OfS) and the Higher Education Statistics Agency (HESA) and/or their nominees/successors. HESA will process your information in accordance with their collection notice¹.

How long shall we keep it for?

Subject to any other notices that we may provide to you, we may retain your personal data for a period of six years after your association with us has come to an end.

Information relating to criminal convictions shall be retained for no longer than is necessary and for a maximum of six months following your provision of a criminal conviction certificate to the UCO as part of your application process.

Some information may be retained indefinitely by us in order to maintain your employment record for archiving purposes (or by the Fundraising & Alumni Teams for the purposes of supporting your lifelong relationship with the UCO).

When your information is no longer required, we will always dispose of it securely in accordance with our Records and Information Management Policy: <https://www.uco.ac.uk/policies-and-procedures>

Information Security

Your information is a vitally important asset to the UCO and as such we are dedicated to ensuring that your information is kept securely and used appropriately. Your information shall be processed in line with our Information Security Policy to ensure that it is treated with the highest respect and appropriate standards to keep it safe and secure.

Please view our Information Security Policy here: <https://www.uco.ac.uk/policies-and-procedures>

Your rights

Under the GDPR² you have the following rights:

- To obtain access to, and copies of, the personal data that we hold about you.
- To require us not to send you marketing communications. If you ask us to delete your personal data, we will continue to maintain a core set of personal data comprising very brief information to ensure that we do not inadvertently contact you in future.
- To require us to correct the personal data we hold about you if it is incorrect or where appropriate, given the purposes for which your personal data is processed, the right to have incomplete data completed.
- To require us to erase your personal data. This is a limited right which applies, among other circumstances, when the data is no longer required or the processing

¹ <https://www.hesa.ac.uk/about/regulation/data-protection/notices>

² <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

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has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest.

- To require us to restrict our data processing activities. This is a limited right which will apply in specific circumstances and for a limited period.
- Where our processing is based on your consent, you may withdraw that consent, without affecting the lawfulness of our processing based on consent before its withdrawal.
- To receive from us the personal data we hold about you which you have provided to us, in a reasonable format specified by you, including for the purpose of you transmitting that personal data to another data controller.
- To object to the processing of your personal data when such processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exemptions or exceptions apply (please see our Freedom of Information Policy and Subject Access Request Procedure for further details³).

If you have given your consent and you wish to withdraw it, please contact our Data Protection & Freedom of Information Officer dpfio@uco.ac.uk with the relevant information.

Please note that:

- Where our processing of your personal data relies on your consent and where you then withdraw that consent, we may not be able to provide all or some aspects of our services to you and/or it may affect the provision of those services.
- Where the legal basis for our processing of your personal data is contractual necessity, we may not be able to perform the contract we have entered into with you if you fail to provide certain personal data.

If you wish to access the personal data we hold about you, please submit a Subject Access Request to us. Please refer to our Subject Access Request Procedure which helps you to do this: <https://www.uco.ac.uk/policies-and-procedures>

Changing your information

Please tell us promptly about any changes to the information we hold about you. This is particularly important regarding your contact and bank details.

You are able to check and amend some data through the HR self-service system or you may send in a request to amend your details by emailing our Data Protection & Freedom of Information Officer dpfio@uco.ac.uk with the relevant information.

Contact the Data Protection & Freedom of Information Officer (DPFIO)

³ <https://www.uco.ac.uk/policies-and-procedures>

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If you have any queries about this privacy notice or how we process your personal data, you can contact our Data Protection & Freedom of Information Officer by:

Email: dpfio@uco.ac.uk

Telephone: +44 (0) 20 7089 5355

Post: Data Protection & Freedom of Information Officer, University College of Osteopathy, 275 Borough High Street, London, SE1 1JE.

If you are not satisfied with how we are processing your personal data, you can make a complaint to the Information Commissioner and you can find out more about your rights under data protection legislation from the Information Commissioner's Office website: www.ico.org.uk.

Document Amendment Record						
Version number	Dates produced and approved (include committee)	Revision Summary	Reason for production/ revision	Author	Location(s)	Proposed next review date and approval required
V1.0	May 2018 SMT	New Document	To comply with new EU data protection legislation (GDPR).	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020
V2.0	Aug 2019 DPFIO	Added new link to HESA collection notices.	Administrative: To clearly direct data subjects to newly produced HESA collection notices.	DPFIO	All master versions will be held in: J:\0 Quality Team - Core Documentation Website	May 2020