

STAFF PRIVACY NOTICE TABLE

TABLE 1 – DATA PROCESSING

No.	Specific Purposes	Legal Basis – Lawful Processing Article 6 GDPR	Legitimate Interest Assessment for use of Art6(1)(f)
1.	<p>Operate recruitment and, internal vacancy and promotion processes.</p> <p>This will include verifying the information provided and assessing your suitability for the role, deciding whether to offer you a job, communicating that outcome (together with any feedback).</p>	<p>(1)(a) data subject has given consent to the processing of his or her personal data for more specific purposes</p> <p>(1)(b) necessary for the purposes of entering into a contract of employment with individuals</p>	
2.	<p>Prevention of illegal working/verification of Right to Work status. For international staff from outside the EU this will be to ensure compliance with UKVI requirements.</p>	<p>(1)(b) necessary for the purposes of entering into a contract of employment with individuals</p> <p>(1)(c) necessary for compliance with a legal obligation to which the controller is subject</p>	
3.	<p>Verification of mandatory criteria required for relevant job post e.g. qualifications, employment references as well as the process of criminal conviction data and DBS checks (if applicable).</p>	<p>(1)(a) data subject has given consent to the processing of his or her personal data for more specific purposes</p> <p>(1)(b) necessary for the purposes of entering into a contract with the data subject</p>	

		(1)(e) necessary for the purpose of a task carried out in the public interest; Schedule 1 conditions, 10 and 18 is applicable where criminal conviction data is processed with a view of preventing prospective employees from harming or posing a risk to others	
4.	To ensure the correct legal information in contained within each individual's contract of employment and to manage the contract	(1)(b) necessary for the purposes of entering into and the performance of a contract to which the data subject is party	
5.	Maintain accurate and up-to-date employment records and contact details or update employment records we already hold on you if you leave and are subsequently re-hired into the University or apply for any internal vacancy or promotion	(1)(b) necessary for the purposes of entering into and the performance of a contract to which the data subject is party (1)(c) necessary for compliance with a legal obligation to which the controller is subject	
6.	Maintain accurate and up-to-date records in respect of next of kin and emergency contacts to be used in the event of staff illness or serious harm	(1)(a) data subject has given consent to the processing of his or her personal data for more specific purposes (1)(d) necessary in order to protect the vital interests if the data subject	
7.	Operate and keep a record of performance processes, to plan for career development and workforce management	(1)(b) necessary for the purposes of the performance of a contract to which the data subject is party	
8.	To ensure that the University meets the required standards of internal and external regulations and governing bodies	(1)(c) necessary for compliance with a legal obligation to which the controller is subject.	

		(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education	
9.	Operate and keep a record of disciplinary and grievance processes to manage any conduct issues in the workplace and ensure employees have access to effective recourse if they have any concerns about their employment	(1)(b) necessary for the purposes of the performance of a contract to which the data subject is party (1)(f) necessary for the purposes of the legitimate interests pursued by the controller, namely Safeguarding and facilitating prevention and detection of crime and assist in the investigation into potential breaches of University regulations and policies	The University has undertaken a LIA in respect of (1)(f) and is compliant with GDPR on grounds that the purpose of the processing is necessary for safeguarding, prevention and detection of crime and to assist in the investigation of potential breaches of University regulations and policies. The data processed is restricted to that which is necessary to actually achieve the purpose, that is both balanced and proportionate to the fundamental rights and freedoms of the data subject including the provision of safeguards to mitigate potential negative impacts.
10.	Pay salaries and expenses, make employee approved and statutory deductions including any attachment of earnings, third party payments, Tax, National Insurance and pension contributions etc.	(1)(b) necessary for the performance of a contract to which the data subject is party (1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
11.	Administration of the University's policies i.e. where a student has made a complaint about a member of staff or other conduct offences	(1)(e) necessary for the performance of a task carried out in the public interest, namely the safeguarding and facilitating prevention and detection of crime and assist in the investigation	

		into potential breaches of University regulations and policies	
12.	Operate and keep a record of absence procedures, to ensure effective absence management and that employees receive the benefits to which they are entitled	(1)(c) necessary for compliance with a legal obligation to which the controller is subject (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education	
13.	To plan staffing levels and any necessary absence cover	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education	
14.	Operate and keep a record of other types of leave, to ensure effective management and to ensure that the University meets its statutory and contractual obligations	(1)(b) necessary for the performance of a contract to which the data subject is party (1)(c) necessary for compliance with a legal obligation to which the controller is subject	
15.	Administration of the University CCTV system in accordance with the University's CCTV policy	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Safeguarding and facilitating prevention and detection of crime and assist in the investigation into potential breaches of University regulations and policies	
16.	Production of statistical returns required for third party government bodies e.g. the Higher Education Statistics Agency, for completion of government supported surveys e.g. Graduate Outcomes and the Teaching Excellence Framework	(1)(c) necessary for compliance with a legal obligation to which the controller is subject. (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education	

17.	Administration and production of staff identification cards including access to the University's I.T. equipment and door access data	(1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education Safeguarding and facilitating prevention and detection of crime and assist into potential breaches of University regulations and policies.	
18.	Creation of staff electronic accounts and emails	(1)(b) necessary for the performance of the University's contracts with its staff; electronic accounts necessary to undertake work; email necessary for University contact, updates etc.	
19.	To monitor University health and safety practices and procedures with a view to ensure ongoing staff development and training in this area	(1)(c) necessary for compliance with a legal obligation to which the controller is subject (1)(e) necessary for the performance of a task carried out in the public interest	
20.	Organising staff attendance and roles at University Graduation ceremonies and for ordering required academic dress	(1)(a) the data subject has consented to the processing (1)(b) necessary in the performance of a contract to which the data subject is a party	
21.	To support research projects including statistical data (No information which could identify you will be published)	(1)(c) necessary for compliance with a legal obligation to which the controller is subject	
22.	To provide Research income forecasts and staff costing information for Research bids and subsequent research cost audits	(1)(c) necessary for compliance with a legal obligation to which the controller is subject	

23.	For Welsh Language Standards requirements and reporting	(1)(c) necessary for compliance with a legal obligation to which the controller is subject	
24.	To respond to Freedom of Information requests using anonymised data	(1)(c) necessary for compliance with a legal obligation to which the controller is subject (1)(d) necessary for a task carried out in the public interest, namely the provision of higher education	
Personal Data Released to Third Parties for the Following Purposes			
25.	To next of kin/close family and the emergency services where there is an emergency situation e.g. illness or serious injury where you are unable to provide your consent	(1)(a) the data subject has consented to the processing of his or her personal data for one or more specific purposes (1)(d) necessary in order to protect the vital interests of the data subject or of another natural person	
26.	To professional bodies for occupational health or counselling	(1)(a) data subject has given consent to the processing of his or her personal data for one or more specific purposes	
27.	Higher Education Statistics Agency (HESA)	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
28.	UK Visas and Immigration (UKIV)	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject (1)(e) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller	

29.	To potential employers (where a reference has been requested)	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes	
30.	HM Revenue and Customs (HMRC)	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
31.	Pension schemes – including Teachers' Pensions (TP), the Local Government Pension Scheme (LGPS) and the USS Scheme	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes (1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
32.	Research sponsors/funders	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes.	
33.	For examinations necessary in the assessment and administration of award where the individual undertakes academic studies with the University	(1)(a) data subject has given consent to the processing of his or her personal data for one or more specific purposes. (1)(b) necessary for the performance of a contract to which the data subject is party.	
34.	To trade unions	(1)(a) data subject has given consent to the processing of his or her personal data for one or more specific purposes.	
35.	Benefits Agency as required by Social Security Administration Act 1992	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
36.	Child Support Agency as required by the Child Support Information Regulations 2008 (no.2551)	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	

37.	Police and Security Services (where appropriate data protection protocols have been followed)	(1)(e) Necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller	
38.	Enterprise Cars, the University's hire car provider	(1)(a) data subject has given consent to the processing of his or her information for one or more specific purposes. (1)(b) necessary for the performance of a contract to which the data subject is party	
39.	Ede and Ravenscroft the University's academic dress provider	(1)(a) data subject has given consent to the processing of his or her information for one or more specific purposes. (1)(b) necessary for the performance of a contract to which the data subject is party	
40.	Office of the Independent Adjudicator, with appropriate redaction whenever possible	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
41.	To University insurers	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes (1)(c) necessary for compliance with a legal obligation to which the data controller is subject	
42.	To examiners where academic studies are being undertaken with the University	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes	

		(1)(b) necessary for performance of a contract to which the data subject is party, namely the student contract	
43.	To examiners where professional qualifications and/or training is provided by or on behalf of the University	(1)(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes	
44.	Contact Information for the purposes of Track and Trace and Protect.	(1)(d) necessary in order to protect the vital interests of the data subject or of another natural person (1)(e) the processing is necessary for the performance of its official tasks carried out in the public interest in providing and managing a higher educational service.	
All Staff agree to the University processing their 'sensitive personal data'/'special category of data' for the following purposes and for release to the following third parties			
45.	To ensure employees legal rights are met, to protect employee's health and safety, to take appropriate action in the event of any concerns about an employee's attendance and/or health.	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject	

46.	Maintain and promote equality in the workplace in accordance with the Equality Act 2010 through monitoring the effectiveness of our policies and procedures, statutory reporting or in response to formal Freedom of Information requests as anonymised data, to provide individual support and workplace adjustments, and to contact target groups about equality characteristic specific consultations, services and positive action initiatives that may affect them.	(1)(c) necessary for compliance with a legal obligation to which the data controller is subject (1)(e) necessary for the performance of a task carried out in the public interest, namely the provision of higher education	
47.	Obtain Occupational Health advice, to ensure that the University complies with its	Article 9(1)(a) processing “special categories” where you have given consent – the University will	

	duties in relation to individuals with disabilities and health and safety law	process certain sensitive information about you with your consent	
48.	To the Police and Security Services (where appropriate data protection protocols have been followed)	Article 9(1)(a) processing “special categories” of data where you have given consent – the University will process certain information about you with your consent. Or Article 9(1)(g) processing “special categories” of data where necessary for reasons of substantial public interest	
49.	To the University’s external lawyers, insurers in respect of accidents occurring within the institution and, external auditors	Article 9(1)(f) processing “special categories” of data in connection with legal claims	
50.	Where required, to organisations to manage and mitigate the spread and impact of the current outbreak of coronavirus (COVID-19) risks to public health (e.g. Track and Trace and Protect).	Article 9 (2) (c) processing “special categories” of data is necessary in order to protect the vital interests of the data subject or of another natural person – by sharing contact details of person (s) with symptoms of ill health (e.g. Covid-19 symptoms) which maybe the data subject or another natural person that they may have come into contact with on University premises and may have underlying health conditions. Article 9(2)(g) – substantial public interest and DPA 2018 Schedule 1 Part 2 para 6 (Statutory and government Purposes) Article 9 (2) (i) public health purposes and DPA 2018 – Schedule 1 Part 1 para 3 Public Health.	

TABLE 2 – DATA RETENTION

Short Description	Retention Period	Action at End of Retention Period	Record Owner
Recruitment and Application			
Successful applications	After the termination of employment + 7 years	Destroy	Executive Director of HR
Unsuccessful applications	After completion of recruitment process +1 year.	Destroy	Executive Director of HR
Incoming references provided in support of application	If successful to be added to staff file.		Executive Director of HR

Interview records	After completion of recruitment process +1 year.	Destroy	Executive Director of HR
DBS checks and certificates	6 months	Destroy	Executive Director of HR
Training, Development & Performance Management			
Statutory/regulatory required training records	After termination of employment +7 years	Destroy	Executive Director of HR/ Executive Director of Finance
Staff Performance Records	After current year +6 years	Review	Executive Director of HR/ Executive Director of Finance
PDR record including individual staff member training and development needs, pay reviews, staff feedback on training and development processes	PDR stored on electronic system; after termination of employment +3 years	Destroy	Executive Director of HR/ Executive Director of Finance
Disciplinary and Grievances Processes and Procedures			
Staff grievance records and formal complaints	After last action on case +6 years	Review	Executive Director of HR
Staff discipline including oral/verbal warnings, written warnings, notes of disciplinary hearings kept on file	After closure of case +6 years	Review	Executive Director of HR
Administration of Human Resources and Payroll			
Income Tax and NI Return, including correspondence with tax office	Not less than three years after the financial date to which they relate.		Executive Director of HR/Executive Director of Finance
Administration and calculation of leave entitlements	After current financial year +7 years Information added to HR pay system and/or staff files may be kept longer	Destroy	Executive Director of HR/ Executive Director of

			Finance/Professional Services
Sickness and absence records (fit notes or Occupational Health Reports)	The record showing someone was sick is part of their employment record – reason code (major, minor and other groupings) and is also held electronically as part of HR System. Other records – after current year +6 years	Destroy	Executive Director of HR/Executive Director of Finance/Professional Services.
Occupational Health referral letters and reports	After cessation of employment +6 years	Destroy	Executive Director of HR
Termination of employment records including exit interviews	After termination of employment +7 years	Destroy	Executive Director of HR/Executive Director of Finance/Professional Services.
Employment/Trade Union agreements	After termination of relationship +10 years	Review	Executive Director of HR
Pension Administration			
Staff pension files	After termination of employment +75 years	Review	Executive Director of HR
Pension policies	After termination of employment +75 years	Review	Executive Director of HR
Retirement Pension Schemes- records of notifiable events, relating to incapacity	After the end of the Scheme year in which the event took place +6 years		Executive Director of HR
Track and Trace			
Track and Trace and Protect	Name and contact details up to 3 weeks	Destroy	Executive Director of HR

This document contains supplementary information regarding personal data processed by Wrexham Glyndwr University in relation to its staff under GDPR and is intended to be read in conjunction with Wrexham Glyndwr University's Staff Privacy Notice at <https://wgyou.glyndwr.ac.uk/departments/information-governance/>

Reviewed: August 2020	Author: Leonna Messiter	Additions: 44 & 50 – Both relating to the collection of personal data and when required, sharing of personal data to a third party (includes special category – relating to health) for Track, Trace and Protect purposes.
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Further information in relation to retention periods for staff records can be found under the 'Guidelines for Records and Information Security and Schedule for Records Retention' at <https://wgyou.glyndwr.ac.uk/departments/information-governance/how-long-to-keep-records/>