



## DATA PROTECTION STATEMENT: STAFF AND SENIOR MEMBERS

### Statement regarding the use of personal information

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|------------------|---|------|------------|
| Purpose          | This Data Protection Statement sets out how the College collects and processes the personal information of staff and senior members |      |            |
| Author           | JNER  | Date | 15.05.2018 |
| Replaces         | New statement   |      |            |
| Approved by      | Governing Body  | Date | 21.05.2018 |
| Next Review date | Currently under review  |      |            |

### Legal basis for collecting your personal information

1. This statement explains how Corpus Christi College (“we” and “our”) handles and uses information we collect about our staff and senior members (“you” and “your”). For these purposes, “staff” is intended to include employees, workers, casual workers and contractors (e.g. undergraduate supervisors, ad-hoc or temporary maintenance, kitchen or catering staff etc.) In broad terms, we use your data to manage your employment and/or membership with the College, including your role and the performance of it, how we support you as an employer, and how you are paid, as well as other statutory requirements.
2. The controller for your personal information is Corpus Christi College, Trumpington Street, Cambridge, CB2 1RH. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (OIS Ltd), 12B King’s Parade, Cambridge, 01223 768745, [college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk). OIS Ltd should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.
3. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Data Protection Coordinator, [dpc@corpus.cam.ac.uk](mailto:dpc@corpus.cam.ac.uk).
4. Unless otherwise stated, the legal basis for processing your personal data is that it is necessary for the performance of the employment contract or membership agreement (implicit in your admission as a Fellow) that we hold with you, or for statutory purposes (e.g. processing your monthly salary, tax and pension contributions).
5. When changes are made to this statement, we will publish the updated version on our website and notify you by other communications channels as we deem appropriate or necessary.

### How your data are used by the College

6. Your data are used by us for a number of purposes, including:
- a. **supporting your employment and your performance in your role**, where personal data collected and processed includes:
    - i. (\*) personal details, including name, contact details (phone, email, postal, both work and personal) and photograph;
    - ii. your current and any previous role descriptions;
    - iii. your current and any previous contracts of employment and related correspondence;
    - iv. any occupational health assessments and medical information you have provided, and related work requirements; and
    - v. (\*) your training and development qualifications, requests and requirements.
  - b. **ensuring that you have the right to work for the College**, where personal data collected and processed includes:
    - i. (\*) your recruitment information (including your original application form and associated information submitted at that time);
    - ii. other data relating to your recruitment (including your offer of employment and related correspondence, references we took up on your appointment, and any pre-employment assessment of you); and
    - iii. (\*) evidence of your right to work in the UK (e.g. copies of your passport).
  - c. **paying and rewarding you for your work**, where personal data collected and processed includes:
    - i. (\*) your bank details;
    - ii. (\*) details of your preferred pension scheme;
    - iii. your current and previous salary and other earnings (e.g. maternity pay, overtime, unpaid leave), and the amounts you have paid in statutory taxes or voluntary deductions; and
    - iv. correspondence between you and the College, and between members and staff of the College, relating to your pay, pension, benefits, and other remuneration.

In addition, we maintain records of your use or take-up of any benefit schemes provided by us (e.g. healthcare, cycle scheme membership, and childcare vouchers), which we collate and monitor to review the effectiveness of these staff benefits. The legal basis for this processing is that it is in our **legitimate interest** to ensure that any staff benefit schemes represent good value for money to both you and us, and to ensure that you do not overuse your entitlements.

- d. **administering HR-related processes**, including records of absences and regular appraisals of your performance and, where necessary, investigations or reviews into your conduct or performance, where personal data collected and processed includes:
  - i. (\*) records of your induction programme and its completion;

- ii. (\*) records of your performance appraisals with your line manager;
  - iii. records, where they exist, of any investigation or review into your conduct or performance;
  - iv. records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave); and
  - v. correspondence between you and the College, and between members and staff of the College, regarding any matters relating to your employment and. Or membership and any related issues (including but not limited to changes to duties, responsibilities and benefits, your retirement, resignation or exit from the College and personal and professional references provided by the College to you or a third party at your request).
- e. maintaining an **emergency contact point** for you, where personal data collected and processed includes:
- i. (\*) details of your preferred emergency contact, including their name, relationship to you, and their contact details.
- f. **monitoring equality and diversity within the College**, where personal information collected and processed includes:
- i. (\*) information relating to your age, nationality, gender, religion or beliefs, sexual orientation, and ethnicity.
- g. **disclosing personal information about you to external organisations**, as required or permitted by law.
7. Data marked with (\*) above relate to information provided by you, or created in discussion and agreement with you. Other data and information is generated by the College or, where self-evident, provided by a third party.
8. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact the HR Manager in the first instance ([hr@corpus.cam.ac.uk](mailto:hr@corpus.cam.ac.uk)) or the College's Data Protection Coordinator, Mrs Jenny Reavell, Corpus Christi College, Cambridge, CB2 1RH ([dpc@corpus.cam.ac.uk](mailto:dpc@corpus.cam.ac.uk)).
9. We would not monitor social media sites for any personal data relating to you, unless we believed there was a legitimate interest for us to do so (e.g. monitoring compliance with an agreed plan, such as a homeworking agreement) and only if we inform you we might do this in advance. Consequently, we do not routinely screen your social media profiles but, if aspects of these are brought to our attention and give rise to concerns about your conduct, we may need to consider them.
10. We also operate **CCTV** on our sites which will capture footage. Our CCTV policy can be viewed at <https://www.corpus.cam.ac.uk/our-policies-and-procedures>.
11. For certain posts, we may use the **Disclosure and Barring Services (DBS) and Disclosure Scotland** to help assess your suitability for certain positions of trust. If this is the case, we will make this clear to you in separate correspondence. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of

Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information. We recognise that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

### Who we share your data with

12. For staff and senior members we would normally publish (on our website and elsewhere) your name, photograph (if you have provided one), your email and College contact 'phone number. There may also be some basic biographical information relating to your College and University posts.
13. We share your personal information where necessary and appropriate across the collegiate University. The University and its partners (including all of the Colleges) have a data sharing protocol to govern the sharing of information about staff and members of the College. This is necessary because they are distinct legal entities. The parties may share any of the above categories of personal information. Any transmission of information between partners is managed through agreed processes that comply with UK data protection legislation. The agreement can be viewed in full at <https://www.ois.cam.ac.uk/policies-and-protocols/data-sharing-protocols>.
14. We share relevant personal data with our sub-contracting agents (e.g. payroll, HR, health and safety, staff benefits, counsellors, occupational health) and with relevant government agencies (e.g. HMRC, Office for National Statistics, UK Visas and Immigration) and your pension provider. Information is not shared with other third parties without your written consent, other than your name, role and employment contact details which are made publically available. Generally personal data is not shared outside the European Economic Area, unless requested by you.

### How long your data are held

15. We hold all information for the duration of your employment/ membership and for no more than twelve months after the end of your employment or cessation of your membership. After that time, we retain some personal data for up to seven years (to comply with HMRC standard retention periods) after your relationship with the College ends. The retained data includes:
  - i. (\*) personal details, including name and your preferred personal contact details (if we still have these);
  - ii. proof of your eligibility to work in the UK (as required by UK Visas and Immigration);
  - iii. your previous salaries and other earnings, pensions and the amounts you have paid in statutory taxes;
  - iv. records of your performance appraisals with your line manager;
  - v. records, where they exist, of any investigation or review into your conduct or performance;
  - vi. your reasons for leaving and any related correspondence; and
  - vii. any references we have written subsequent to your employment with us.

Those marked with an (\*) relate to information provided by you, or created in discussion and agreement with you.

16. We reserve the right to retain the personal data longer than the periods stated above, where it becomes apparent that there is a need to do so – for example, in the event of a major health or personal injury incident, records may need to be kept for up to forty years.
17. After seven years, or longer where it becomes apparent or legally necessary to do so, we retain a small subset of personal data in permanent archive for the lifetime of the College, including:
  - i. your full name and title;
  - ii. your job title(s) or College affiliation(s) and the corresponding dates of your employment/ membership; and
  - iii. any other information where there is a statutory/ legal obligation to do so.
18. The exception is for Fellows whether or not they are a member of staff or a senior member for the purposes of this Data Protection Statement. After seven years the following are stored in permanent archive for the lifetime of the College:
  - i. pre-employment checks (e.g. evidence of qualifications);
  - ii. references and supporting documentation for successful applications;
  - iii. contracts, or records of admission to the Fellowship;
  - iv. photograph, or replica or a College portrait;
  - v. job descriptions/ person specifications;
  - vi. evidence of completion of induction process;
  - vii. changes in terms and conditions;
  - viii. records documenting remuneration and rewards;
  - ix. correspondence regarding sabbaticals; and
  - x. records documenting termination of employment and/ or membership.

## Your rights

19. You have the right: to ask us for access to, rectification, or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them, for example where there is an overriding legal requirement to keep such data.
20. Failure to provide the information reasonably requested of you may result in disciplinary action taken by the College, which could ultimately lead to your dismissal from employment.
21. If you have questions or concerns about your personal information, or how it used, please speak to the relevant College staff in the first instance. If you need further guidance, please contact the HR Manager ([hr@corpus.cam.ac.uk](mailto:hr@corpus.cam.ac.uk)) or the Data Protection Coordinator ([dpc@corpus.cam.ac.uk](mailto:dpc@corpus.cam.ac.uk)).

22. You can also contact The Data Protection Officer for the College at the Office of Intercollegiate Services Ltd (OIS Ltd), 12B King's Parade, Cambridge, 01223 768745, [college.dpo@ois.cam.ac.uk](mailto:college.dpo@ois.cam.ac.uk).
  
23. If you remain unhappy with the way your information is being handled, or with the response received from us or the Data Protection Officer, you retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/concerns/>).