



Employee Privacy Policy

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Our contact details

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Application of this notice

This notice explains how Linacre College will collect, use or otherwise process personal data of prospective, current, visiting and former office holders, trustees, staff, apprentices, interns, volunteers and similar individuals (“you”), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it. This notice should also be read by self-employed providers and other contractors who are engaged to provide services to the College.

Linacre College has also developed and published other privacy notices which may apply to you, for example as a student, alumnus or attendee of events. You should read this privacy notice together with such other notices as may apply.

This notice does not form part of any contract of employment or other contract to provide services. We reserve the right to update this privacy policy at any time and will seek to inform you of any substantial changes. We may also notify you in other ways from time to time about the processing of your personal data.

The type of personal information we collect

“Personal data” is information relating to you as a living, identifiable individual. In the course of facilitating your engagement with the College, we may obtain or generate a range of personal data about you.

Your personal data may be received from you, or it may be received from colleagues, a third party such as a referee, a public source or another organisation. We may create the data ourselves.

It is important that you are able to understand what types of data the College holds and processes about you, for what purposes that data is used, and our legal bases for that processing.

The types of personal data that we hold might include:

- Contact details that you provide to us, including current and previous names, addresses and telephone numbers.
- Other personal details, such as your date of birth, sex, honorifics, preferred names, and relationship/marital status.
- Your position, role, contract terms, grade, salary, benefits and entitlements.
- Records about your recruitment, including your application paperwork, roles sought, previous experience, details of your qualifications, references, requests for special arrangements, results of any testing, deliberations and communications regarding our decisions.



- Declarations about Conflicts of Interest.
- Copies of passports, right to work documents, visas and other documents required to comply with immigration checks.
- Biometric data, as part of mandatory immigration records.
- Diversity and inclusion monitoring data.
- Details of any relevant criminal convictions or charges that we ask you to declare to us, either when you apply to us, or during your employment. We also carry out pre-employment checks including Disclosure and Barring Services (“DBS”) checks which will provide us with details of any relevant criminal convictions and/or cautions that you have received.
- Detail of any emergency and/or next of kin contacts you have provided to us.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration of and decisions on reasonable adjustments made as a result.
- Absence records, including leave requests, sickness records and related data.
- Your financial details, including bank and building society account numbers, sort codes, BACS IDs, NI numbers, tax codes, payslips and similar data.
- Accounting information including Battels, expenses and similar data.
- Pensions membership data, including identification numbers, quotes and projections, terms benefits and contributions.
- Learning and development records, including your attendance, completions, accreditations and certifications.
- Promotion and progression records, including applications, references and supporting materials, records of deliberations and decisions, feedback and awards.
- Records regarding grievances, disciplinary proceedings or investigations prompted by, involving or relating to you.
- Health and Safety records involving or related to you.
- Photographs and video recordings (for example CCTV from our premises, or photographs taken by us for identification purposes or to be displayed on our website and used for marketing purposes). *If there are reasons that public disclosure of photographs showing your image may be inadvisable, please contact the HR team to discuss.*
- Access control information from our properties.
- Computing and email information, including login information and usage of our IT systems, IP address(es), equipment allocated to you and records of network access.

It is important that the data we hold about you is accurate and current. Please keep us informed of any changes that may be necessary during your time at Linacre College.

How we get your personal information

Most of the personal information we process is provided to us directly by you or generated by us in the course of our relationship with you.

We also receive personal information indirectly, from the following sources:



- Letters of recommendation and references from employment agencies, former employers, and people you have nominated in an application to the College.
- The University of Oxford, which operates a number of systems that Colleges have access to, including systems that allow the College to access your teaching allocation records and schedules.
- Information from medical professionals relating to your capacity and any appropriate adjustments that need to be made in order to allow you to carry out your work.
- Personal information transferred to us by another organisation, such as the University or a college, in certain circumstances and with your consent.
- Information from Government agencies (such as HMRC), background checking services, credit reference agencies, and pension providers.
- Fellow members of the College, family members, friends, visitors to the College and other contacts who may provide us with information about you if and when they contact us, or vice versa.

Our legal basis for processing your personal data

Under data protection legislation, unless an exemption applies, the College must have a 'lawful basis' for all personal data processing. There are six main legal bases, as set out below:

Contract: To the extent that we have a contract with you (or one is in prospect), our primary legal basis for processing your personal data is that the processing is necessary for the performance of a contract with you, or in order to take steps at your request prior to entering into a contract. This can relate, but is not limited to, processing linked with training, remuneration, benefits, performance appraisal, workload management, and communication about issues connected with your work, its location or critical systems.

Legal Obligation: Processing of your personal data may be necessary for compliance with our legal and professional obligations to third parties as an employer including, not limited to, right to work, tax, health and safety, and equality and inclusion.

Legitimate Interests: Further we may process your personal data in pursuit of our legitimate interests. Our legitimate interests include:

- supporting the wellbeing of our staff and the College community, and promoting a supportive work environment;
- communication with and maintaining our relationship with you;
- protecting the safety and wellbeing of everyone whilst on our premises, and of our staff when engaged in work for the College regardless of location;
- maintaining the security of our systems, premises, equipment and information to prevent cyber or physical incidents;



- recording activities for evidentiary purposes in the case of suspected or actual security or other incidents affecting the College;
- recording relevant activities for evidentiary purposes in College disciplinary processes arising from breaches in policies, inappropriate behaviour by College members or third parties, and/or breaches of employment terms and conditions;
- monitoring our workforce and engaging in availability planning;
- monitoring diversity and inclusion within the College community; and
- seeking confidential legal advice.

Public Task: We may process your data in furtherance or support of specific tasks that are in the public interest. Examples include but are not limited to processing in support of our educational and research functions, processing in support of military reservists, and the sharing of relevant staff information with government and regulatory authorities where required for their own processes.

Vital Interests: We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests.

Consent: In a small number of cases, and only if where other lawful bases do not apply, we may process your data based on your consent. At present, we do not use consent as our basis for processing in relation to the personal data of prospective, current, visiting or former staff. If consent is used, you may withdraw your consent at any time by writing or emailing Linacre Human Resources hr@linacre.ox.ac.uk

Our purposes for processing your data

The table below provides an overview of our main uses for personal data and connects them to the legal bases likely to be relevant to such processing. It is possible for the same data to be collected or generated by the College for multiple reasons and purposes, meaning that a number of available legal bases may be relevant at any given point.

If you have questions as to the specific legal basis applicable to specific processing, please contact hr@linacre.ox.ac.uk.

Purpose for which data is processed	Legal basis for that processing
To make decisions about your recruitment, appointment, continued employment and/or exit from the business, including determining any applicable contractual terms and sponsorship, carrying out background checks, checking your qualifications and references, and sharing relevant information with clients where needed.	Contract Legal Obligation Public Task Legitimate Interests



To meet immigration and employment law requirements.	Legal Obligation
To communicate with you in relation to your employment, employment tasks, and to engage with you on a day-to-day basis in that regard.	Contract Legitimate Interests
To administer the financial aspects of your employment, including paying you, deducting tax and National Insurance contributions, liaising with your pension provider, and engaging in business management and planning (e.g. accounting and auditing tasks).	Contract Legal Obligation Legitimate Interests
To manage and administer the wider terms of your contract with us, including conducting performance reviews, managing performance. recording and assessing your development, making decisions regarding salary reviews and promotions, and complying with health and safety obligations.	Contract Legal Obligation Legitimate Interests
To understand our workforce and their wellbeing, including ensuring that they feel supported as part of the College community.	Vital Interests Legitimate Interests
To meet legal obligations regarding Health & Safety, to manage access to our properties, to promote a safe working environment, and to reduce potential for fraud and other unlawful behaviours.	Contract Legal Obligation Legitimate Interests
To investigate, follow and evidence company processes in relation to grievances, disciplinary proceedings or investigations prompted by, involving or relating to you.	Contract Legal Obligation Legitimate Interests
To monitor your use of our information and communication systems to ensure compliance with our IT policies. Ensuring network and information security, including preventing unauthorised access to our computer and electronic communications systems and preventing malicious software distribution.	Contract Legitimate Interests
To conduct workforce analysis and planning, and to review and better understand retention and attrition rates.	Legitimate Interests
To meet equalities law requirements	Legal Obligation
To engage with complaints and possible legal disputes involving you, or other employees, workers and contractors.	Legal Obligation Legitimate Interests
To enable a merger, acquisition, change of control, joint venture or other similar arrangement involving the College and its business.	Legal Obligation Legitimate Interests



Although we collate, generate and process your personal information for specific purposes, on some occasions we may wish to use that data for a new purpose. We are permitted to do so where the new purpose is compatible with our original purpose, we obtain your consent, or we are under a clear obligation or function set out in law.

Special category personal data and details of criminal offences

Certain personal data is subject to additional safeguards under data protection legislation. Such information includes details of:

- your racial or ethnic origin;
- your political opinions;
- your religious beliefs or other beliefs of a similar nature;
- whether you are a member of a trade union;
- your physical or mental health or condition;
- your sexual life;
- the commission or alleged commission by you of any offence, or
- any proceedings for any offence committed or alleged to have been committed by you, the disposal of such proceedings or the sentence of any court in such proceedings.

It may be necessary for us to process some special category personal data in order to comply with legal or regulatory obligations (including making reasonable adjustments for colleagues with disabilities, or to fulfil our obligations to the Office for Students and other sector regulators), or if we need to do so in order to seek confidential legal advice, or establish or defend legal claims. Processing may also be necessary to fulfil legal obligations or exercise legal rights, to enable a merger, acquisition, change of control, joint venture or other similar arrangement involving our business.

It may be necessary for us to process some special category personal data for purposes of identifying or keeping under review the existence or absence of equality of opportunity between specified groups by monitoring specified diversity and inclusion data (ethnic/racial origin, religious/philosophical belief, physical/mental health, sex life and sexual orientation).

We will process health data provided to us in accordance with our rights and obligations as an employer, including requesting occupational health, medical assistance or other wellbeing support for employees, engaging in internal absence monitoring, and supporting health insurance claims by our employees.

Special category data may also be processed in the course of investigative, disciplinary, grievance, redundancy and other internal processes., as well as in relation to the establishment, exercise or defence of



legal claims. Special category and/or criminal offence data may also, in rare cases, need to be shared on with authorities such as HMRC, law enforcement or UK Visas & Immigration.

We do not base our processing of special category data on your consent. You may on occasion be requested to consent to participate in specific processes, such as referrals to Occupational Health, but such consent is to participation in the referral process, not to the processing of personal data.

The consequences if you decide not to provide your data

If you decide not to supply personal data that we have requested and as a result we are unable to comply with professional, legal or regulatory obligations, then we may not be able to enter into, or continue, with your employment.

For example, copies of your passport, right to work, and visa information will be collected to enable us to comply with UK Immigration and Visa requirements. Financial data, including your account number and sort code, BACS ID, NI number, salary, tax codes and payments information, ensures that we can fulfil our tax and payroll obligations.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Once such data is volunteered to us, it will be processed in accordance with our rights and obligations as an employer. Please note that the basis for processing volunteered data is not consent – see above for relevant legal bases. Examples of volunteered information include: diversity and inclusion monitoring data, which is requested by us as part of the diversity monitoring that we undertake to fulfil our legal obligations under the Equality Act 2010, and disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make any reasonable adjustment(s).

Who will see or use your data and who might we share it with

We do not, and will not, sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law.

Basic professional information, such as professional email addresses, names, and details of your availability may be shared with colleagues within the College to facilitate introductions, the smooth progress of ongoing work, engagement, the advancement of College projects and initiatives, internal processes, and the maintenance of the College community.

Other personal data will be seen only by relevant members of the HR Team in the course of their duties and your manager where relevant (for example, sickness absences).



The College will provide basic professional information, such as professional email addresses, names, and details of your availability to students and other academics, to facilitate teaching, introductions, and networking.

It is possible that the college will need to voluntarily disclose your personal data to external bodies:

- We may need to share your data with relevant third parties to facilitate our contract with you for example:
 - BACs payment providers to pay you;
 - The Universities Superannuation Scheme/Oxford Staff Pension Scheme to support the provision of your pension;
 - Mortgage lenders or letting agents where you request that we that we supply information;
 - Occupational Health Providers; or
 - Employee benefits providers and insurers.
- We may outsource some of our services or engage consultants, professional advisors and others to support us in delivering or evaluating activities within the College (for example, auditors, trainers, courier or IT services). In these cases, relevant personal data would be provided to and processed by the provider of such services, in accordance with the terms of our contract with them and to the extent appropriate for the performance of that contract.
- We may need to share your data with other colleges and/or PPH's within the University of Oxford, University offices and/or University departments to facilitate our contract with you and meet internal, University and intercollegiate needs.
- We may be asked or choose to share data with agencies (in the UK and abroad) responsible for the prevention and detection of crime, the apprehension of prosecution of offenders, the collection of mandated payment s (such as child support) and/or the collection of taxes and duties.
- We might also need to share or transfer your data confidentially with relevant parties and/or their professional advisers if there is a merger, acquisition, change of control, joint venture or other similar arrangement involving the College and its activities.

Exceptionally we might need to share your personal information to obtain necessary confidential legal advice or to comply with our insurance, legal or regulatory obligations. For example, we may have to provide some public authorities such as HMRC, the Office of the Independent Adjudicator, your professional regulatory bodies (if applicable), UK Visas and Immigration, the Higher Education Funding Council for England and the Disclosure and Barring Service with relevant data.

Where information is shared with third parties, we will share the minimum amount of information necessary.



Transfer of your data to other countries

We may transfer your data to other countries, which may not have the same legal protections for your data as the UK.

Where data is being transferred outside of the European Economic Area, we will take steps to ensure that your data is adequately protected in accordance with legal requirements. Where we are in a contractual relationship with the recipient, such protection will normally consist, at minimum, of appropriate contractual protections agreed between us and the recipient.

Otherwise, we may transfer your data if, for example, it is necessary for performance of our contractual duties to you, or we have other legal obligations to transfer the data, or it is necessary for important reasons of public interest.

If you require further detail about the protections in connection with any particular relevant transfer, matter or jurisdiction please ask us.

How long will we keep your data

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

We expect to retain your personal data in accordance with our retention policies for up to seven years after your employment or role ends. This policy is reviewed periodically and the periods for storage specified in it may alter depending on the requirements of law and regulation, best practice and insurance.

We may be obliged to suspend any planned destruction or deletion under with [the Oxford University retention policies](#) where legal or regulatory proceedings require it or where proceedings are underway such as require the data to be retained until those proceedings have finished.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

We have put in place measures to protect the security of your information. Details of these measures are available from the University's Information Security website.



College Archives

The College maintains an archive into which appropriate records are transferred.

The law recognises that there is a public interest in permitting the permanent preservation of personal data for the long-term benefit of society, and that such processing must be distinguished from processing that supports the day-to-day business of the College. If you would like to understand more about the College archives, please contact us.

Your data protection rights

Under certain circumstances, by law you have the right to:

- **Request access to your data** (commonly known as a “subject access request”). This enables you to receive a copy of your data and to check that we are lawfully processing it.
- **Request correction of your data.** This enables you to ask us to correct any incomplete or inaccurate information we hold about you.
- **Request erasure of your data.** This enables you to ask us to delete or remove your data under certain circumstances, for example, if you consider that there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your data where you have exercised your right to object to processing (see below).
- **Object to processing of your data** where we are processing it in order to meet our public interest tasks or legitimate interests (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your data for direct marketing purposes.
- **Request the restriction of processing of your data.** This enables you to ask us to suspend the processing of your data, for example if you want us to establish its accuracy or the reason for processing it.
- **Request the transfer of your data to another party.**

Depending on the circumstances and the nature of your request it may not be possible for us to do what you have asked, for example, where there is a statutory or contractual requirement for us to process your data and it would not be possible to fulfil our legal obligations if we were to stop. However, where you have consented to the processing, you can withdraw your consent at any time. In this event, we will stop the processing as soon as we can. If you choose to withdraw consent it will not invalidate past processing. Further information on your rights is available from the Information Commissioner’s Office (ICO).

If you want to exercise any of the rights described above or are dissatisfied with the way we have used your information, please contact the College’s Information Compliance Team at data.protection@linacre.ox.ac.uk. We will seek to deal with your request without undue delay, and in any event in accordance with the requirements of the GDPR. Please note that we may keep a record of your communications to help us resolve any issues which you raise.



If you are dissatisfied with our processing, you also have the right to lodge a complaint with the ICO at <https://ico.org.uk/concerns/>.