



Hopwood Hall College
& University Centre

PRIVACY NOTICE

This notice explains what the College does with the personal information you provide us.

This notice applies to current and former employees, consultants and volunteer workers.

The College is aware of its obligations under the General Data Protection Regulation (GDPR) and domestic data protection legislation and is committed to processing your data securely and transparently. This privacy notice sets out, in line with current data protection obligations, the types of data that we hold on you as a member of staff of the College. It also sets out how we use that information, how long we keep it for and other relevant information about your data.

We are the data controller of personal information about you.

We are: Hopwood Hall College and University Centre
Our address is: Rochdale Road, Middleton, Manchester M24 6XH

If you have any questions about this policy, or the ways in which we use your personal information, please contact our Data Protection Officer at dpo@hopwood.ac.uk

This privacy notice has been prepared in accordance with the General Data Protection Regulation (EU) 2016/679 ("GDPR") and the Data Protection Act 2018.

What is personal information and what does data processing mean?

Personal information is any information that relates to you and can be used directly or indirectly to identify you.

Personal information and processing are defined as follows:

- Personal data means any information relating to an identified or identifiable natural person (data subject). An identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person (GDPR article 4).

- Special categories of personal data mean that information about an individual’s racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health, sex life or sexual orientation and biometric/genetic data (GDPR article 9).
- Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction (GDPR article 4).

What data we collect

We collect data about you in a variety of ways and this will usually start when we undertake a recruitment exercise where we will collect the data from you directly. This includes the information you would normally include in an application form, CV or a recruitment cover letter, or notes made by our recruiting officers during a recruitment interview. Further information will be collected directly from you when submitting information at the start of your employment/engagement, for example, your bank and next of kin details. Other details may be collected directly from you in the form of official documentation such as your driving license, passport or other right to work evidence.

We collect a range of information including;

- Name, date of birth, NI Number, Gender, Marital Status
- Contact information including phone, email and postal addresses
- Next of kin, emergency contact information
- Educational information including prior qualifications
- Employment history, CVs, references
- Diversity data (e.g. sex, age, ethnicity, disability)
- Details of medical or health conditions
- Financial information i.e. bank details, Tax code
- Salary, benefits and pensions
- Your hours and days of work
- Registration of interests and professional memberships
- Trade union membership (if declared)
- Usage of any benefits such as childcare vouchers or cycle to work scheme
- Driving license and car registration details (for car parking and minibus driving use)
- Current and previous job titles, job descriptions, pay grades, pension entitlement, hours of work and other terms and conditions relating to your employment/engagement with us.
- Letters of concern, formal warnings, and other documentation with regard to any disciplinary proceedings or, in the case of workers, confirmation of other discussions about your conduct.
- Internal performance management information including measurements against targets, formal warnings and related documentation with regard to performance management procedures, appraisal etc.
- Leave records including annual leave, special, sickness absence etc.
- Details of any criminal record and declarations made in accordance with the Rehabilitation of Offenders Act 1974
- Details of your training record
- Website usage data

In some cases, we will collect data about you from third parties, such as employment agencies, former employers when gathering references or credit reference agencies.

Personal data is kept in personnel files or within the College's HR and IT systems.

Why we process your data

The law on data protection allows us to process your data for certain reasons only:

- to perform the employment contract that we are party to
- to carry out legally required duties
- for us to carry out our legitimate interests
- to protect your interests and where something is done in the public interest
- where we have obtained your consent

All the processing carried out by us falls into one of the permitted reasons. Generally, we will rely on the first three reasons set out above to process your data. For example, we need to collect your personal data to:

- carry out the contract that we have entered into with you and
- ensure you are paid.

We also need to collect your data to ensure we are complying with legal requirements such as:

- ensuring tax and National Insurance is paid
- carrying out checks in relation to your right to work in the UK and
- making reasonable adjustments for disabled individuals.

We also collect data so that we can carry out activities which are in the legitimate interests of the College. We have set these out below:

- Making decisions about who to offer initial employment/engagement to, and subsequent internal appointments, promotions etc.
- Making decisions about salary and other benefits.
- Providing contractual benefits to you.
- Maintaining comprehensive up to date personnel records about you to ensure, amongst other things, effective correspondence can be achieved and appropriate contact points in the event of an emergency are maintained.
- If you are an employee, effectively monitoring both your conduct and your performance and to undertake procedures regarding both if the need arises.
- If you are an employee, offering a method of recourse for you against decisions made about you via a grievance procedure.
- Assessing training needs.
- Implementing an effective sickness absence management system including monitoring the amount of leave and subsequent actions to be taken including the making of reasonable adjustments.
- Gaining expert medical opinion when making decisions about your fitness for work.
- Managing statutory leave and pay systems such as maternity leave and pay etc.
- Business planning and restructuring exercises.
- Dealing with legal claims made against us.
- Preventing fraud.
- Ensuring our administrative and IT systems are secure and robust against unauthorised access.

Special categories of data

Special categories of data are data relating to your:

- health
- sex life
- sexual orientation
- race
- ethnic origin
- political opinion
- religion
- trade union membership
- genetic and biometric data.

We must process special categories of data in accordance with more stringent guidelines. Most commonly, we will process special categories of data when the following applies:

- you have given explicit consent to the processing
- we must process the data to carry out our legal obligations
- we must process data for reasons of substantial public interest
- you have already made the data public.

We will use your special category data:

- for the purposes of equal opportunities monitoring
- in our sickness absence management procedure
- to determine reasonable adjustments.

We do not need your consent if we use special categories of personal data in order to carry out our legal obligations or exercise specific rights under employment law. However, we may ask for your consent to allow us to process certain particularly sensitive data. If this occurs, you will be made fully aware of the reasons for the processing. As with all cases of seeking consent from you, you will have full control over your decision to give or withhold consent and there will be no consequences where consent is withheld. Consent, once given, may be withdrawn at any time. There will be no consequences where consent is withdrawn. If you wish to withdraw your consent to processing please contact the DPO at dpo@hopwood.ac.uk

Criminal conviction data

We will only collect criminal conviction data where it is appropriate given the nature of your role and where the law permits us. This data will usually be collected at the recruitment stage, however, may also be collected during your employment. We use criminal conviction data in the following ways:

- To ensure the safeguarding of children and vulnerable adults.

We process this data because of our legal obligation to safeguard children and vulnerable adults.

If you do not provide your data to us

One of the reasons for processing your data is to allow us to carry out our duties in line with your contract with us. If you do not provide us with the data needed to do this, we will be unable to perform those duties e.g., ensuring you are paid correctly. We may also be prevented from confirming, or continuing with, your employment/engagement with us in relation to our legal obligations if you do not provide us with this information e.g., confirming your right to work in the UK

or, where appropriate, confirming your legal status for carrying out your work via a criminal records check.

Sharing your data

Your data will be shared with colleagues within the College where it is necessary for them to undertake their duties. This includes, for example, your line manager for their management of you, the HR department for maintaining personnel records and the payroll department for administering payment under your contract.

We share your data with third parties to obtain employment references or occupational health reports.

We also share your data with third parties for the purpose of administering our staff survey. This is done under a Data Processing Agreement.

We do not share your data with bodies outside of the European Economic Area.

Protecting your data

We comply with the Data Protection Act 2018 and the General Data Protection Regulation (GDPR), including removing your personal information from our systems when it is no longer required, and ensuring that all personal information supplied is held securely. Whenever you provide such personal information, we will treat that information in accordance with this statement, current legislation and our [Data Protection Registration](#) (Registration Number: Z6764170).

We are aware of the requirement to ensure your data is protected against accidental loss or disclosure, destruction, and abuse. We have implemented processes to guard against such.

Where we share your data with third parties, we ensure that your data is held securely and in line with current data protection requirements. Third parties must implement appropriate technical and organisational measures to ensure the security of your data.

How long we keep your data for

In line with data protection principles, we only keep your data for as long as we need it for, which will be at least for the duration of your employment with us though in some cases we will keep your data for a period after your employment has ended. Retention periods can vary depending on why we need your data, as set out below:

- Personnel files are retained for a period of seven years post-employment.

For more information on this please see the [Data Retention Policy](#).

Automated decision making

No decision will be made about you solely because of automated decision making (where a decision is taken about you using an electronic system without human involvement) which has a significant impact on you.

Your rights in relation to your data

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

- The right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice

- The right to ask us what personal information about you we are holding and to have access to a copy of your personal information, [which can be accessed by filling out the SAR form and emailing it to DPO@hopwood.ac.uk](#)
- The right to ask us to correct any errors in your personal information
- The right, in certain circumstances such as where we no longer need your personal information, to request that we restrict the use that we are making of your personal information
- the right, in certain circumstances such as where our use of your personal information is based on your consent and we have no other legal basis to use your personal information, to ask us to delete your personal information.
- The right, in certain circumstances, to object to the processing of your personal data.
- The right, where your data is processed on the basis of consent or for the performance of a contract and is carried out by automated means, to ask us to provide you, or another Data Controller, with a copy of your personal information in a structured, commonly-used, machine-readable format.
- The right to make a complaint to the Information Commissioner's Office (ICO) if you are unhappy about the way your personal data is being used – please refer to the ICO's website for further information about this (<https://ico.org.uk/>).

Where you have provided consent to our use of your data, you also have the unrestricted right to withdraw that consent at any time. Withdrawing your consent means that we will stop processing the data that you had previously given us consent to use. There will be no consequences for withdrawing your consent. However, in some cases, we may continue to use the data where so permitted by having a legitimate reason for doing so.

Please contact the Data Protection Officer using the contact details below to exercise any rights in relation to your personal data.

How to access your information

Employment records:

Please contact the Human Resources department in writing, stating the information you would like to access:

Human Resources Dept.
Hopwood Hall College and University Centre
Rochdale Road,
Middleton,
Manchester
M24 6XH
Tel: 0161 643 7560
HR@hopwood.ac.uk

Further information

If you have any questions about Data Protection at the College, please contact:

dpo@hopwood.ac.uk

Administration Services
FAO Data Protection Officer
Rochdale Road,
Middleton,
M24 6XH
Tel: 0161 643 7560

You can also fill out the [Subject Access Request Form](#) and send it to dpo@hopwood.ac.uk

If you have a data protection concern that cannot or has not been resolved by the College, you have the right to raise it with the [Information Commissioner's Office](#).

Changes to our Privacy Notice

We keep our privacy policy under regular review. Any changes we make to our privacy policy in the future will be published on the College website at <https://www.hopwood.ac.uk/about/reports-policies/>

Policy Name	PRIVACY NOTICE [Staff]
Version Number	v1 – Draft
Policy Owner	Matthew Taylor – Executive Director
Release Date	25/04/2024 [TBC]
Policy valid for	2 years
