



Wadham College Privacy Notice: Further information for current staff, office holders, senior members and others with a College association

This document provides further details for staff, office holders, senior members of Wadham College on the ways that their personal data is processed by the College. It forms part of, and should be read in conjunction with, the privacy notice of Wadham College, available on the [College's GDPR webpage](#).

College association includes:

- Current and former staff (including casual workers)
- Office holders and senior members
- Self-employed (e.g. out-tutors)
- Volunteers

Below is the further information for the relevant sections in the master Privacy notice (section number provided in brackets).

1. How we obtain your data (Section 5)

Data that we hold on you may come from different sources: we might receive it from you; we might create it ourselves, or we might receive it from a third party.

Categories of data that we collect, store and use include (but are not limited to):

Provided by you

- The contact details that you provide to us, including names, addresses and telephone numbers
- 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 membership of Wadham College
- Information required for a Disclosure and Barring Service (DBS) check
- Right to work documents
- Details of any medical issues and/or disabilities that you disclose to us
- Equality monitoring data
- Dietary requirements
- Financial details (e.g. bank account and payroll details)

- Conflicts of interest you disclose to us

Generated by us, the University of Oxford, or other third parties (for example pension providers)

- Your position, role, terms and conditions of employment
- Records relating to the recruitment process, application paperwork and any requests for special arrangements
- Record of DBS check
- Records relating to the consideration of medical issues/disabilities whilst employed
- Pensions membership data
- Learning and development records (e.g. training details)
- Capability procedure records (e.g. performance reviews)
- Promotion and progression records
- Records regarding grievances, disciplinary and harassment proceedings (informal or formal)
- Attendance and absence records
- Photographs, audio and video recording
- Computing and email information
- Biometric data (e.g. fingerprints) for use with the clocking on system.

2. Details of our processing activities, including our lawful basis for processing (Section 9)

Data that you provide to us and the possible consequences of you not providing it

Most data that you provide to us is processed by us in order that we, and you, can each fulfil our contractual obligations and/or comply with obligations imposed by law. For example:

- Right to work: Copies of your passport, right to work, and visa information will be collected by us at the time of your application to enable us to comply with UK Immigration and Visa requirements. We may also be required by law to retain that data, along with related information (such as your application paperwork, shortlists and selection committee papers) until a certain point after your employment with the College ends.
- Financial data: including your account number and sort code, BACS ID, NI number, salary, tax codes and payments information are collected by us at the time of your appointment to enable us to pay you in accordance with the contract between us.
- Conflict of Interest: You have a contractual obligation to inform us of relevant conflicts of interest affecting your involvement in Wadham College management and decision-making. Failure to do so may undermine the reputation and integrity of Wadham College, and may have legal implications.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, a failure to provide copies of your passport, right to work and visa information, may mean that we are unable to enter into, or continue, with your employment. A failure to notify Wadham College of relevant conflicts of interest may result in disciplinary proceedings being commenced.

Some data that you give to us is provided on a voluntary basis – you have a choice whether to do so. Examples include:

- Equality monitoring data, which is requested by the College as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- 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 a reasonable adjustment.

Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources. These include:

- Data that we generate about you, such as when processing your application, arranging payments, and/or in relation to accommodation provided by Wadham College;
- The University of Oxford, which operates a number of systems that Colleges have access to (e.g. teaching allocation records and schedules, online training);
- Your previous educational establishments and/or employers if they provide references to us;
- Fellow members of Wadham College, family members, friends, visitors to Wadham College and other contacts who may provide us with information about you if and when they contact us, or vice versa.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Home Office; UK Visas and Immigration	To fulfil Wadham College's obligations as a visa sponsor
Disclosure and Barring Service (DBS)	Required for certain posts to assess an applicant's suitability for positions of trust or where the post works with vulnerable people or children.
Research England via the University of Oxford	Data submitted for the Research Excellence Framework (REF) which is a system for assessing the quality of research in higher education.
HM Revenues & Customs (HMRC)	Real time information released to HM Revenue & Customs (HMRC) in order to collect Income Tax and National Insurance contributions (NICs) from employees.

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other Colleges and/or permanent private halls within the University of Oxford, University offices and/or departments	Where a member is employed by, or connected to both organisations, or are providing services in different parts of the collegiate university, we may need to share relevant data for the proper functioning of relevant contracts and services.
Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders, or collection of a tax or duty	For the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, for the protection of the public, and/or to support the national interest.
Mortgage lender and letting agencies	In order to allow these organisations to verify for mortgages and tenancy agreements. Release of this

Organisation	Why?
	information is subject to a written request being received from the employee.
Universities Superannuation Scheme (USS); Oxford Staff Pension Scheme (OSPS)	In order to provide data required for the provision of pensions by these providers.
Higher Education Statistics Agency (HESA) via the University of Oxford	Some information, usually in pseudonymised form, will be sent to the HESA for statistical analysis and to allow government agencies to carry out their statutory functions.
Occupational Health providers	To enable the provision of these facilities.
Third party service providers	To facilitate activities of Wadham College. Any transfer will be subject to an appropriate, formal agreement between Wadham College and the processor.

3. How long we keep your data (section 12)

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

The retention period, will depend on the category of the data. As a general guide, our expected retention periods are as follows (this is not exhaustive):

Expected retention period	Data
Information deleted immediately upon termination of employment	Dietary information (under review by system provider)
One month/30 days	Biometric data (e.g. fingerprint-based clocking in machine) CCTV footage (unless involving a conduct or health & safety matter which is retained for 6 years)
One year following completion of the process	Unsuccessful applicant data (except when a visa applicant sponsored by the College, or the recruitment process is mentioned in Governing Body) Room bookings and computer and email information (e.g. log-in details, IT connection details) Next of kin/emergency details (one year following the end of the academic year) Housing tenancies (or until superseded by a follow-up check)
One year after the termination of employment	Allocation of access cards IT password and access level information
One year after the end of the academic year in which the event took place	Event and meal bookings
Two years after the employment ends	Right to work documentation (e.g. copies of passport)
Six years following the end of the academic year in which the employment contract ended	Recruitment records including probation periods and reference details (provided by and in relation to you) Equality monitoring data Learning and development information, performance reviews, sabbaticals, promotion details, flexible working requests. Grievance, disciplinary, harassment (unless there is a legal requirement or other lawful grounds for further retention). Capability cases Medical records, Occupational Health reports, pastoral care records.

Expected retention period	Data
Seven years following the end of the financial year in which the employment ended	Financial records including those related to payroll, College-owned residential property, pension membership, benefits, conflict of interest. Personal contact details (e.g. name, address, telephone) Staff rotas, working hours, time and attendance records, sickness absence records Research projects End of employment records
Seven years from the date we learn of the incident	Records of information security incidents and of PC misuse incidents
Ten years from the end of the relevant academic year	Teaching schedule information
Kept until the child to which the record relates is 18 years old	Parental leave records.
40 years	Records relating to an employee's exposure to asbestos, lead or radiation
In perpetuity (permanent)	Papers submitted to Governing Body or other College committee, which may cover areas such as recruitment, disciplinaries, harassment, grievances, capabilities, reference data, absence details, exposure to asbestos and end of employment record. Photographs (informal and formal) and records of cultural life donated by members Attendance and participation in relevant College administrative meetings

4. Contact Details (Section 3)

If you have queries regarding the above information then please contact either:

- Non-academic staff – HR Manager (personnel@wadham.ox.ac.uk)
- Academic Staff – Academic Administrator (admin@wadham.ox.ac.uk) or Wardens Executive Assistant (warden.ea@wadham.ox.ac.uk)

A full record of our processing activity is available on request from the Data Protection Officer at Wadham College:

- Data Protection Officer, Wadham College, Parks Road, Oxford OX1 3PN
- Email: data.protection@wadham.ox.ac.uk; Tel: (01865) 277900

5. Revision History

Version	Date	Changes & Approvals
0.1	20 May 2018	Draft for Discussion
0.2	21 May 2018	Incorporating comments from GDPR Advisor, HR Manager, Academic Records Manager
0.3	21 May 2108	Formatting changes
1.0	23 May	Approved for publication by Governing Body