QAA Privacy Policy - Our Colleagues

This Privacy Notice explains how the Quality Assurance Agency for Higher Education ('QAA', 'we', 'us' or 'our') gathers and processes your personal information in compliance with the relevant data protection regulation and laws. This notice provides you with information regarding your rights and our obligations, and explains how, why and when we process your personal data.

We act as data controller and/or data processor when processing your data. QAA is registered with the Information Commissioner's Office (ICO) with registration number (Z570112X).

Our Data Protection Officer responsible for overseeing data protection compliance at QAA and can be contacted at governance@qaa.ac.uk.

What is personal data?

Personal data is any information which directly or indirectly identifies an individual, for example, your name, email address or telephone number. Special category personal data is personal data that we look after more carefully because it is sensitive, such as details about your race or ethnicity, religious or philosophical beliefs, sexual orientation, political opinions, trade union membership, information about your health and genetic or biometric data. Where we collect such information, we will only request and process the minimum necessary for the specified purpose and identify a compliant legal basis for doing so.

What information we collect

QAA processes personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will not collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

Our colleagues are defined as:

- employees including temporary agency staff
- QAA Board and committee members
- contractors
- reviewers
- assessors
- registrant and lay visitors
- volunteers
- people who apply to work with us
- members of QAA working groups.

Why we need your data

We process personal information to meet our legal, regulatory, statutory and contractual obligations and to provide you with information, either about our products and services or about matters of public interest. We will not collect any unnecessary personal data from you and will not process your information in any way other than as specified in this notice without telling you first.

How we use your personal data

QAA takes your privacy very seriously and will never disclose, share or sell your data without your knowledge, unless we are required to do so by law. Where you have consented to us providing you with promotional offers and marketing, you are free to withdraw this consent at any time. The purposes and reasons for processing your personal data are detailed below:

Our colleagues	
Purpose of the processing	To fulfil our contracts of employment with you, by ensuring that you are paid correctly and on time. To fulfil our obligations for performing criminal record checks for roles requiring direct contact with children or vulnerable adults To fulfil our health and safety obligations to you by ensuring we can contact you or your next of kin in the event of an emergency or unauthorised absence. To enable a line manager to contact a team member in the event of a business continuity incident. Where you have given us your consent to process your data for a specific purpose.
Legal basis of the processing	**GDPR Article 6 (1)(a)** consent - on specific occasions where QAA will only process certain data if you consent. **GDPR Article 6(1)(b)** fulfilment of a contract. **GDPR Article 9(2)(b)** employment, social security and social protection legal obligations (**Special Category Data only**). **GDPR Article 6(1)(f)** legitimate interest. We use legitimate interest as the lawful basis for processing in the event of a business continuity incident. **Article 6(1)(d)** vital interests - where processing is necessary in order to protect the vital interests of the data subject or of another natural person.
Categories of personal data collected or processed	Name including salutation Personal address including postcode Personal telephone number Any job-related information Personal email address Date of birth and age Gender Car registration details for car parking at Southgate House, Gloucester National Insurance number Primary language Marital status Tax code

	Tax year to date totals Pension details Bank account details (sort code, account number, account name, building society reference, autopay reference) Childcare voucher details Details of company benefits to which you are entitled Any compensation related information Proof of identity Employment history and professional experience Working time Information relating to skills and qualifications including language competency Any performance-review related information Any training-related information Any discipline or grievance related information Holiday and absence history Curricula vitae Right to work/study including visa and citizenship details Criminal record checks from: • The Disclosure and Barring Service (DBS) • Disclosure Scotland • Access NI. Nursing & Midwifery Council (NMC) Pin for a registered nurse, midwife or nursing associate Passport details Driving licence details Photograph Audio or video recording Emergency contact details Additional family member information for Benenden including name, DOB, address Information for dependants Next of kin name and telephone number for emergency contact purposes Original documents to satisfy UK right to work checks Biometric resident permits. UK national or overseas national **Special Category Data** Personal data revealing nationality and ethnic origin Personal data revealing disabilities Personal data revealing religious or philosophical beliefs Personal data revealing trade union membership Personal data concerning a person's dietary requirements Biometric data such as facial recognition Data concerning a person's gender Data concerning a person's sexual orientation.
Any recipient or categories of recipients of the personal data	Information about how Pay Dashboard processes personal information can be found in their Privacy Notice: www.paydashboard.com/privacy **PayCircle**

	PayCircle is the software used by Hazlewoods to make BACS transactions on behalf of QAA. Personal details including your name, account details and pay amount are shared with PayCircle, but your personal information is not used in any other way other than to make the necessary bank transfer. A legally binding contract is in place between Hazlewoods and PayCircle requiring them to process your personal data lawfully and keep it secure. Information about how PayCircle processes personal information can be found in their Privacy Notice: Privacy Policy - Paycircle. Data is also shared with the following: HMRC Superannuation Arrangements of the University of London (SAUL) and Universities Superannuation Scheme (USS) - pension providers PS Financials - finance system Concur - expenses processing system PCS - trade union COPE - occupational health provider Shakespeare Martineau LLP - legal advisers FreshWorks - ServiceDesk system JiscMail - QAA news mailings Cezanne HR - HR system iHASCO - online training provider High Speed Training - online training provider Benenden - employee healthcare provider Click Travel - business travel and accommodation supplier Gallagher - insurance policy provider and associated insurance companies Advance HE - reviewer qualification verification Posturite - ergonomic equipment supplier DPD - supplier of courier services FedEx. - supplier of overseas courier services Deltec - supplier of courier services Commercial - office stationery and furniture Crowe LLP - financial auditors Classmarker - data protection test marker site DocuSign - electronic e-signature software British Council - key expert CV's and biographies Barclaycard - company credit cards Experian Limited – for right to work checks for new colleagues to validate that an individual has a right to work in the UK Experian Limited – for standard criminal record checks for roles that are exempt from the Rehabilitation of Offenders Act 1974 DHL – for courier services Converge Technology Solutions – supplier of laptops and peripherals Microsoft – Online application forms and surveys for recruitment and employee, reviewer or visitor survey purposes Cvent Europe Ltd – events management software provider Focus Group – QAA's mobile phone supplier Amazon Business – for deliveries Royal Mail – for deliveries

	NMC QA Link – for NMC quality assurance activities. Text Anywhere - SMS platform for online messaging The People's Pension - pension scheme contributions or reviewers/assessors and NMC Visitors HSBC - for salary and expense payments to QAA colleagues Hazlewoods – for payroll purposes HP – work laptop provision Dell – work laptop provision HEDD – for qualification verification purposes. In the course of our operations, we may use generative artificial intelligence tools to assist with data analysis, drafting, summarising, and internal productivity. Specifically, we utilise: • Claude AI (provided by Anthropic) • Microsoft Copilot (provided by Microsoft Corporation) The inputs, prompts, and outputs we submit are not used to train Anthropic's or Microsoft's foundational public models. In all cases, sharing is limited to the information necessary for the performance of a function.
Details of transfers to non-EU countries and safeguards	**Saul** The Trustee of pension provider, Saul, may instruct companies specialising in tracing people, to transfer personal data to a country outside of the European Economic Area (EEA) if a data subject moves home and forgets to inform them of their new address details. **USS** Should pension provider, USS, conclude that is it necessary to transfer personal data outside the EEA to any countries not on the approved EC list, they will ensure appropriate legal protection is in place to protect such data, including but not limited to, binding corporate rules, model contractual clauses, or other legal grounds permitted by applicable legal requirements. **Gallagher** In the event of an insurance claim, Gallagher may transfer personal information they collect about individuals to countries outside of the United Kingdom ('UK') or European Economic Area ('EEA'). Gallagher's regular transfers include: To their parent group, AJG & Co., in the United States of America. To India to assist with back-office functions. Intragroup data transfer agreements (utilising Standard Contractual Clauses) provide safeguarding. Read Gallagher Privacy Policy | Gallagher UK (ajg.com). **Click Travel** When a colleague books travel or accommodation, Click Travel provide traveller's booking information to the suppliers of those travel services. Click Travel also use third party service providers to support their service provision. These include travel intermediaries, and other, less direct,

	business functions, including IT support or hosting of data on cloud platforms. View Click Travel's list of sub-processors. **Shakespeare Martineau** It may be necessary for Shakespeare Martineau to transfer personal information outside the UK or to an international organisation in order to receive support from a supplier. Whenever Shakespeare Martineau transfer personal data out of the UK, they ensure at least one of the following safeguards is implemented: • They will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data. • Where they use certain service providers, they may use specific contracts approved for use in the UK. See Shakespeare Martineau LLP Privacy Notice. **Cvent Europe Ltd** To facilitate Cvent's business practices and delivery of their services, personal data may be collected, accessed from, transferred to or stored in the United States or in other countries where Cvent Europe Ltd operate, including countries outside the European Economic Area (EEA), Switzerland, and UK. Personal data may be accessed by Cvent personnel providing services in any country where they have facilities, or in which they engage third party service providers (processors or sub-processors), including India, Australia and Singapore. Please refer to Cvent's Privacy Notice. **Experian Limited** Experian is based in the UK and they operate elsewhere in and outside the European Economic Area. This means that Experian Limited may access personal information from and transfer it to these locations as well. Any personal information that Experian Limited accesses from or transfer to these locations is protected by European data protection standards. To make sure Experian Limited keeps personal information safe, they apply strict safeguards when transferring it overseas. For example: 1. Sending personal information to countries approved by the European Commission as having high quality data protection laws, such as Switzerland, Canada and the Isle of Man, 2. Putting in place a contract that has been approved by the European Commission with the recipient of personal information that provides a suitable level of high quality protection, or 3. Sending personal information to a member organisation approved by the European Commission as providing a suitable level of high quality protection. **Artificial Intelligence Services**

	Anthropic processes data in the United States and protects these transfers with the International Data Transfer Addendum issued by the Information Commissioner, which is used alongside the Standard Contractual Clauses in Anthropic's data processing agreement. Further information is available in the Anthropic Privacy Policy. QAA's Microsoft 365 data, including Copilot history, is stored in the UK. To generate a response, Copilot may process prompts and related data in Microsoft data centres outside the UK, including in the EU and the United States, particularly at busy times. These transfers stay within Microsoft's own services and are protected by the safeguards in Microsoft's Data Protection Addendum. Further information is available in the Microsoft Privacy Statement.
The source of the personal data	Provided by you to HR and/or QAA Finance Team. Provided by you to Pay Dashboard in the creation of an account. Provided by you to QAA's Reviewer Services Team By completing the 'Update my Details' section on QAA's Review Extranet. Microsoft Teams or Zoom Meeting recordings.
Retention period	Six years from employment or contract end date for employees, reviewers and contractors. Six months from recruitment decision for unsuccessful applicants. Six months from end date of employee's or reviewer's contract for right to work, Disclosure & Barring Service (DBS), Disclosure Scotland and Access NI criminal record checks. Two months from end of employment or contract end date for the bank and next of kin details for employees, reviewers and contractors. 14 days within the employment or contract end date for employees or contractors whose personal contact details are held by their line managers for business continuity purposes. Artificial Intelligence Services - Data processed via Claude AI and Microsoft Copilot is retained in alignment with QAA's Retention Schedule. For all other retention periods, please refer to QAA's Retention Schedule.
Whether the provision of personal data is part of a statutory or contractual requirement or obligation and possible consequences of failing to provide the personal data	Processing is necessary as part of a statutory requirement. If you do not provide us with your personal data, we may be unable to fulfil our employment obligations to you. Processing is necessary as part of a contractual requirement. If you do not provide us with your personal data, we may not be able to fulfil our contractual obligations to you.
Automated decision making	None applicable. QAA does not use AI tools for automated decision making.

Retention of your personal data

We retain your personal information in accordance with the GDPR, which obliges us to keep it only for as long as is necessary. QAA has policy on information retention. If we do not have any requirement to retain personal information for business, regulatory, or legal reasons, we will delete.

Use of cookies

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, remember your individual settings and preferences, and to measure how you use websites to ensure they meet your needs.

Details about which cookies QAA uses, why we use them and what you need to do if you do not wish to accept some or all of them are available in QAA's Cookies Statement.

How we protect your personal data

We have appropriate security measures in place to prevent personal data from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal data to those who have a genuine business need to know it. Those processing your personal data will do so only in an authorised manner and are subject to a duty of confidentiality.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

Your rights

If QAA processes personal information about you, you have the right to access that information, and to request information about the following under data protection law:

- what personal data we hold about you
- the purposes of the processing
- the categories of personal data concerned
- the recipients to whom the personal data has/will be disclosed
- how long we intend to store your personal data for
- if we did not collect the data directly from you, information about the source.

In some cases, if you believe that we hold any incomplete or inaccurate data about you, you have the right to ask us to correct and/or complete the information and we will strive to do so as quickly as possible; unless there is a valid reason for not doing so, at which point you will be notified.

You may also have the right to request erasure of your personal data or the right to restrict processing (where applicable) in accordance with data protection law; as well as to object to any direct marketing from us. Where applicable, you have the right to data portability of your information and the right to be informed about any automated decision-making we may use.

To **exercise** any of these rights, you can do so by contacting us:

- By email: governance@qaa.ac.uk

- By telephone: +00 44 (0) 1452 557000 (voicemail only)

If we receive a request from you to exercise any of the above rights, we may ask you to verify your identity before acting on the request; this is to ensure that your data is protected and kept secure.

Making a complaint

QAA only processes your personal information in compliance with this Privacy Notice and in accordance with the relevant data protection laws. If you have any concerns about how we handle your personal data, or if you believe we have not complied with data protection laws, you have the right to raise a complaint.

Contact Us First
We encourage you to contact us directly so we can investigate and resolve your concerns as quickly as possible. You do not need to use any specific legal language or formal forms to raise concerns with us. Please submit your complaint to our Governance Team by emailing Governance@qaa.ac.uk

What to Expect from Our Process
When you submit a data protection complaint, we will handle it in accordance with our Complaints Procedure.

Your Right to Escalate
If you are not satisfied with our response, or if you believe we are processing your personal data unlawfully, you have the right to make a complaint directly with the supervisory authority. In the UK, this is the Information Commissioners Office (ICO).

You can contact them using the details below:
- Website: https://ico.org.uk/make-a-complaint/
- Helpline: 0303 123 1113
- Address: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

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