



## **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@gaa.ac.uk](mailto:governance@gaa.ac.uk) or by telephoning +00 44 (0)1452 557000.

### **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 and workers
- QAA Board and committee members
- contractors
- reviewers
- 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	<p>To fulfil our contracts of employment with you, by ensuring that you are paid correctly and on time.</p> <p>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.</p> <p>To enable resource-sharing in the M5 Group and anyone who may be on secondment to other organisations.</p>
Legal basis of the processing	<p><b>GDPR Article 6(1)(b)</b> fulfilment of a contract</p> <p><b>GDPR Article 9(2)(b)</b> employment, social security and social protection legal obligations</p> <p><b>(Special Category Data only)</b></p>
Categories of personal data collected or processed	<p>Name including salutation</p> <p>Personal address including postcode</p> <p>Personal telephone number</p> <p>Any job-related information</p> <p>Personal email address</p> <p>Date of birth and age</p> <p>Gender</p> <p>National Insurance number</p> <p>Primary language</p> <p>Marital status</p> <p>Tax code</p> <p>Tax year to date totals</p> <p>Pension details</p> <p>Bank account details (sort code, account number, account name, building society reference, autopay reference)</p> <p>Childcare voucher details</p> <p>Details of company benefits to which you are entitled</p> <p>Any compensation related information</p> <p>Proof of identity</p> <p>Employment history and professional experience</p> <p>Working time</p> <p>Information relating to skills and qualifications including language competency</p> <p>Any performance-review related information</p> <p>Any training-related information</p> <p>Any discipline or grievance related information</p> <p>Holiday and absence history</p> <p>Curricula vitae</p> <p>Right to work/study including visa and citizenship details</p> <p>Passport details</p> <p>Driving licence details</p> <p>Emergency contact details</p> <p>Additional family member information for Benenden including name, DOB, address</p> <p>Information for dependants</p> <p>Next of kin name and telephone number for emergency contact purposes</p> <p><b>Special Category Data</b></p>

	<p>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  Data concerning a person's gender  Data concerning a person's sexual orientation.</p>
<p>Any recipient or categories of recipients of the personal data</p>	<p>Information about how Pay Dashboard processes personal information can be found in their Privacy Notice: <a href="http://www.paydashboard.com/privacy">www.paydashboard.com/privacy</a></p> <p><b>Corvid Paygate</b>  Corvid Paygate is the software used by Hazlewoods to make BACS transactions on behalf of clients (like QAA). Personal details including your name, account details and pay amount are shared with Corvid Paygate, but your personal information is not used in any other way other than to make the necessary bank transfer.</p> <p>A binding contract is in place between Hazlewoods and Corvid Paygate requiring them to process your personal data lawfully, and keep it secure.</p> <p>Information about how Corvid Paygate processes personal information can be found in their Privacy Notice: <a href="http://www.corvid-paygate.com/privacy-statement">www.corvid-paygate.com/privacy-statement</a></p> <p>Data is also shared with the following:  <a href="#">HMRC</a>  <a href="#">Superannuation Arrangements of the University of London (SAUL)</a> and <a href="#">Universities Superannuation Scheme (USS)</a> - pension providers  <a href="#">PS Financials</a> - finance system  <a href="#">Concur</a> - expenses processing system  <a href="#">PCS</a> - trade union  <a href="#">COPE</a> - occupational health provider  <a href="#">Shakespeare Martineau LLP</a> - legal advisers  <a href="#">FreshWorks</a> - ServiceDesk system  <a href="#">Jisc</a> - outsourced IT provider  <a href="#">JiscMail</a> - QAA news mailings  <a href="#">Cezanne HR</a> - HR system  <a href="#">iHASCO</a> - online training provider  <a href="#">High Speed Training</a> - online training provider  <a href="#">Benenden</a> - employee healthcare provider  <a href="#">Click Travel</a> - business travel and accommodation supplier  <a href="#">Eventsforce</a> - events management software provider  <a href="#">Gallagher</a> - insurance policy provider  <a href="#">Advance HE</a> - reviewer qualification verification  <a href="#">Posturite</a> - ergonomic equipment supplier  <a href="#">DPD</a> - supplier of courier services  <a href="#">FedEx</a> - supplier of overseas courier services  <a href="#">Deltec</a> - supplier of courier services  <a href="#">Commercial</a> - office stationery and furniture  <a href="#">EventsAir</a> - events management software provider  <a href="#">Crowe LLP</a> - financial auditors  <a href="#">Classmarker</a> - data protection test marker site  <a href="#">DocuSign</a> - electronic e-signature software  <a href="#">British Council</a> - key expert CV's and biographies.  <a href="#">Barclaycard</a> - company credit cards.  <a href="#">A&amp;E Fire Security</a> – fire alarm alert app  <a href="#">Stanley Guard</a> – fire alarm alert app</p> <p>In all cases, sharing is limited to the information necessary for the performance of a function.</p>

Details of transfers to non-EU countries and safeguards	<p><b>Saul</b> 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.</p> <p><b>Gallagher</b> 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 &amp; Co., in the United States of America. To India to assist with back-office functions.</p> <p>Intragroup data transfer agreements (utilising Standard Contractual Clauses) provide safeguarding. Read <a href="#">Gallagher Privacy Policy   Gallagher UK (ajg.com)</a>.</p> <p><b>Click Travel</b> 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 <a href="#">Click Travel's list of sub-processors</a>.</p> <p><b>Shakespeare Martineau</b> 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.</p> <p>Whenever Shakespeare Martineau transfer personal data out of the UK, they ensure at least one of the following safeguards is implemented:</p> <ul style="list-style-type: none"> <li>• They will only transfer personal data to countries that have been deemed to provide an adequate level of protection for personal data.</li> <li>• Where they use certain service providers, they may use specific contracts approved for use in the UK.</li> </ul> <p>See <a href="#">Shakespeare Martineau LLP Privacy Notice</a>.</p>
The source of the personal data	<p>Provided by you to HR and/or QAA Finance Team.</p> <p>Provided by you to Pay Dashboard in the creation of an account.</p> <p>Provided by you to the Central Resource Team</p> <p>By completing the 'Update my Details' section on QAA's Review Extranet.</p>
Retention period	<p>Six years from employment or contract end date for employees and contractors.</p> <p>Six months from recruitment decision for unsuccessful applicants.</p>
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	<p>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.</p> <p>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.</p>
Automated decision making	None applicable.

## 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@gaa.ac.uk](mailto:governance@gaa.ac.uk)
- By telephone: +00 44 (0) 1452 557000
- By post: Governance Team, QAA, Southgate House, Southgate Street, Gloucester, GL1 1UB.

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 our use of your personal information, you can make a complaint to us by contacting:

The Data Protection Officer

QAA

Southgate House, Southgate Street, Gloucester, GL1 1UB

+00 44 (0) 1452 557000

[Governance@qaa.ac.uk](mailto:Governance@qaa.ac.uk)

You can also complain to the supervisory authority, the Information Commissioner's Office (ICO) if you are unhappy with how we have used your data. The ICO's address is:

Information Commissioner's Office

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline Number: 0303 123 1113

Website: <https://ico.org.uk/concerns/handling>.

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