UNIVERSITY OF PORTSMOUTH

STATEMENT:

PRIVACY STATEMENT FOR STAFF

September 2026

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† Delete as appropriate

External queries relating to the document must be referred to corporate-governance@port.ac.uk

1. Purpose & Scope

1. This statement explains to members of University staff how their personal data, including special category data, collected from them by the University and relevant subsidiary companies, may be used, including some examples of how such data is processed.
2. The statement is of primary interest to all staff (both past and present) whose data is processed by the University of Portsmouth (the 'University'), and may be of general interest to the wider public.
3. Staff are made aware of this statement in their employment contracts and induction paperwork.
4. Queries about the use of personal data from staff suggest that this statement is known about and read.
5. Periodic information governance audits also check that the information in the statement is known about and understood.

2. Definitions

Term	Definition
Personal Data	any information that relates to an individual (in this case, you, as a (former) member of staff) who can be identified either directly by that information or by a combination of that information and other identifiers, such as your name, staff ID number, job title.
Special Category Data	Information that reveals racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade-union membership, the processing of genetic or biometric data in order to identify an individual, data concerning health or data concerning an individual's sex life or sexual orientation. The University does not collect all of this data but will collect some for the purposes listed below.
Criminal Offence Data	Personal data relating to criminal convictions and offences.

We will collect your personal and special category data - and potentially criminal offence data - directly from you on employment, through the completion of staff surveys and possibly from third parties for example, when working with a recruitment agency, references from former employers, and in the case of health referrals.

3.Statement

1. Who is processing your personal and special category data?

1.1 The University and some of its subsidiary companies process data about you to administer your employment whilst at the University as a member of staff, and after you have left, in order to provide references and to confirm your employment at the University, for example in relation to pension enquiries. The following contact information may be useful.

1.2 The University's correspondence address is:
The University of Portsmouth
Mercantile House
Hampshire Terrace
Portsmouth, PO1 2EG

1.3 Main switchboard: 023 9284 8484

1.4 The University's Data Protection Officer is Mrs Sarah Arnold.

1.5 If you have any queries about this privacy statement, please contact data-protection@port.ac.uk

2. What we use the data for

2.1 The University processes your personal data, and your special category data, for a variety of purposes, involving all aspects of the administration of your employment (as well as once you leave the University) including:

- your welfare;
- your use of University facilities;
- for statistical purposes;
- for management and planning purposes, and
- for the purposes of building a positive and inclusive culture.

2.2 The University will generally contact you to keep you informed of events relevant to your employment through All Staff communications but if you sign up to University initiatives, for example, the Employee Benefits platform, you will be contacted directly on either your University email address or any other email address you provide.

2.3 **Your responsibilities**
In order for the University to be able to process your data properly, it is your responsibility to inform us as soon as possible if data we hold about you is incorrect or requires updating. As a member of staff you are able to see a range of data about yourself on the Employee Self Service (ESS) part of the Human Resources system, including the job, contact and pay details. You can change / update many of these items yourself and you are encouraged to do so on a regular basis through the ESS. Where it is not possible for you to update your own details, staff in HR will be able to do it for you once informed of the details that need to be changed.

2.4 We collect the contact details of person(s) nominated by you as an emergency contact. You must notify that person that we are holding this data, which will only be used in an emergency. You must remember to update this information as and when necessary.

3. Our legal basis for processing your data

3.1 The University's legal basis for processing the majority of your personal data is that the processing is necessary for the performance of the employment contract you enter into with the University.

3.2 The University is also under a legal obligation to process some data concerning you and to provide that data to third parties, for example, His Majesty's Revenue and Customs or the Health and Safety Executive.

3.3 The University may use your work contact details to keep you informed of initiatives such as opportunities for study or to take part in research, and for volunteering purposes. Some contact details will also be passed to the recognised trade unions in order for them to contact you. We believe that this processing is necessarily within the University's legitimate interests.

3.4 If we need to process any special category data about you (or criminal offence data), when requesting the data, we will either:

- ask for your specific consent to process this data;
- use either or both of the legal bases that the processing is necessary in the field of employment or for the purpose of the assessment of the working capacity of an employee;
- consider whether the processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health, or
- process the data to enable us to promote and maintain equality of opportunity or treatment between different groups of people.

3.5 Under the Equality Act 2010, the University has a legal responsibility to make reasonable adjustments if you disclose a disability at any time during your employment. This data is defined as special category data and will be processed by Cordell Health Ltd, the third party contracted by the University to provide occupational health services to the University.

3.6 The data we request from you at the time of, or during your employment, is necessary to administer your work at the University. Any failure to provide the data may result in the termination of your employment.

4. Who will have access to your data?

4.1 Only those members of staff within the University who need to have access to the data you provide when you begin, and continue, your employment, and those who update information via the ESS portal, to administer your employment, will routinely have access to your data. Therefore, staff within HR and the Finance Department will have access to the parts of your personal data that it is relevant for them to be able to access to carry out their work, as may some administrative staff within your Faculty / department / school, your Head of School or Department, your line manager, and the Executive Dean of your Faculty or the Head of your Professional Service. It may also be necessary for other staff to have access to this data in relation to other University processes, but this access will be contained to only those individuals who need the access and only for so long as is needed for them to carry out the work which requires the access.

5. Who will receive your data?

5.1 It is not possible to list all of the bodies with whom we might have to share your personal data, but the following are examples of when the University will release data about you to third parties either where you ask us to, where we have a legitimate reason to use that data in connection with your employment here at the University or where the University is under a legal requirement to provide data:

5.2 Data may be released to third parties such as HMRC, in relation to matters associated with your employment. We are required to pass data about you (in coded and anonymised form) to the Higher Education Statistics Agency (HESA) which then creates your HESA Staff Record. Some of this anonymised data will be passed to other statutory bodies involved with the funding of education, but it cannot be used in any way that could affect you personally. For further details of how your HESA Staff Record may be used by HESA please go to Collection notices | HESA.

5.3 Details of any reportable accidents are passed to the Health and Safety Executive (HSE). Data provided to the HSE will include personal data of any individual involved in the incident, including witnesses.

5.4 If you are referred to the University's Occupational Health service, your data will be accessible by Cordell Health Ltd staff, and potentially other external professionals, as well as Corporate Health and Safety staff if appropriate.

5.5 Your data will be used to produce anonymised statistics to show workforce trends and/or used in pseudonymised data analysis to support organisational requirements (e.g.: our REF submission).

5.6 Your data will be shared with Pension Funds administrators – Local Government Pension Scheme, Teachers Pensions as appropriate, the NHS Pensions Agency, the NEST pension scheme and the Aviva pension scheme.

5.7 We will provide data on request to the police and other enforcement agencies in emergencies and where crime detection or prevention can be aided by its release, for example, responding to information requests from the UK Visas and Immigration Service (UKVI).

5.8 The University has a duty of care to all of its members of staff and therefore, if the University has a justifiable concern about a staff member's welfare (vital interests), the University may pass that member of staff's contact details and information about the concern to an appropriate third party, for example, the police or a mental health team, to safeguard that member of staff. The University may also contact the person you have nominated as your emergency contact / next of kin in this situation. The University also has a duty of care to the wider community and may pass a staff member's contact details to the public health authorities if required.

5.9 Data may be released to third party organisations that host University data, but only as much data as is needed to allow the third party to complete their work will be shared. For example:

- the University's staff card supplier, for use in the production of your staff card;
- Microsoft 365 / Google Apps for Education;
- the University's car parking providers for payments and permits;
- the University's Staff Travel Management and Expenses Service provider, in order to book travel arrangements and to contact you to provide travel updates etc.

5.10 All instances of data sharing / hosting are covered by contractual arrangements or an operational agreement with the party concerned and the list at 5.9 is not exhaustive.

5.11 Data may be released to specific third parties in order to carry out research relevant to the staff population but this will only be done where necessary, and when covered by a data processor agreement.

5.12 If your post requires a Disclosure and Barring Service (DBS) check, these are carried out using the University's DBS checking supplier (Due Diligence Checking), which will review the data you provide and submit the application to the DBS. The results of the DBS check are reported back to the University, but the details are sent directly to you as the applicant.

5.13 The University has a staff discount portal with a third party, Vivup (also known as SME HCI Ltd). The University will provide Vivup with staff email addresses to enable initial registration and marketing communications to be issued (from which individuals can opt-out if desired).

5.14 We will not, however, release data to any third person without there being a reason compatible with our work to do so, except where you ask us to. This means that we will not release data to banks, friends, relatives etc., without your prior agreement, unless in an emergency. If you wish us to provide data in nonemergency situations, you should provide us with written consent to release the data.

5.15 Data may be sent to or received from third party agencies in relation to the government's Prevent Strategy (2011) for counter-terrorism. Data shared for Prevent purposes is covered by an Information Sharing Agreement between all relevant partner agencies.

6. Will your data be sent or stored abroad?

6.1 The University uses a range of systems and service providers to process and store personal data. Personal data may be stored within the United Kingdom (UK) or the European Economic Area (EEA). In some circumstances, personal data may be transferred to, processed in, or accessed from countries outside the UK or EEA. Where this occurs, the University ensures that appropriate safeguards are in place in accordance with applicable data protection legislation. This may include transfers to countries that are the subject of a UK adequacy regulation or European Commission adequacy decision, or the use of approved contractual and other legal safeguards to protect personal data.

6.2 Data supplied to the Staff Travel Management and Expenses System may be stored on servers based outside of the EU. The processing of any data on servers based outside of the EU is covered by standard contractual clauses.

7. How long will your data be stored?

7.1 We retain your full employment record after the end of your employment, so that we can provide references or pension details when asked to do so. (After six years we will only retain a minimal record to confirm that you were employed by the University, when and for how long, and also for pension purposes.)

7.2 If you have been employed in a post where you may / have been in contact with various hazardous substances, we may keep your record for longer than six years for health reasons.

7.3 Further details of the situations where we might keep your data for longer than six years can be found in the University's Record Retention Schedule.

8. Your rights

8.1 You are entitled to request a copy of the data you provide to us in an electronic format so that you may pass that data to another body (the right to data portability), as well as to request a copy of the data we hold about you (a Subject Access Request).

8.2 You are also entitled to raise an objection to the processing where the processing of data we hold about you is likely to cause you damage or distress, and to request either the rectification of any incorrect data, the restriction of any further processing of your data or the erasure of your data (right to be forgotten).

8.3 You have the right to withdraw your consent for processing your personal data where we have originally asked for your consent. However, where we collect your personal data under another legal basis, it may not be possible for us to remove all of your personal data from our records if you request this.

8.4 If you require any further information on or wish to exercise any of your rights listed above, please contact the Information Governance team at data-protection@port.ac.uk.

8.5 Finally, you have the right to complain about the processing of your data to the UK regulator, the Information Commission (formerly the Information Commissioner's Office). For more information about this body and how to make a complaint, please see www.ico.org.uk

9. Further Information and Guidance

9.1 If you have any queries about this document, or if you are unsure about which aspects of this statement apply to you, please contact the University's Information Governance Team at data-protection@port.ac.uk

9.2 For further information or guidance on the policy framework or its application, please contact the Executive Director of Corporate Governance at corporate-governance@port.ac.uk

If you need this document in an alternative format, please email: corporate.communications@port.ac.uk

The latest version of this document is always to be found at: https://policies.docstore.port.ac.uk/policy-106.pdf

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If an alternative effective date is specified, the policy takes effect on the later of the approval date and the posting date.

The University's approach to policy governance is informed by the CUC Higher Education Code of Governance ("apply or explain").

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