

# Trinity College, Cambridge

## Data Protection Privacy Statement

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### How we use your personal information

#### Staff and senior members

This statement explains how Trinity College (“we” and “our”) handles and uses information we collect about our staff and senior members (“you” and “your”). For these purposes, “staff” is intended to include employees, Fellows, workers and casual workers and contractors (e.g. undergraduate supervisors, ad-hoc or temporary maintenance, kitchen or catering staff etc.) It also includes those former staff now in receipt of a pension from the College Staff Pension Scheme. In broad terms, we use your data to manage your employment or membership with the College, and/or provision of services to the College, including your role and the performance of it, how we support you as an employer, and how you are paid, as well as other statutory requirements.

#### Data Controller

The controller for your personal data is Trinity College, Cambridge, CB2 1TQ. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, may be contacted at [data.protection@trin.cam.ac.uk](mailto:data.protection@trin.cam.ac.uk).

This is the same address to contact if you want to exercise any of your data protection rights, including requesting copies of personal data the College holds about you.

The Data Protection Officer for the College is Intercollegiate Services Limited (ISL), 64 Bridge Street, Cambridge CB2 1UR; email: [dpo@isl.colleges.cam.ac.uk](mailto:dpo@isl.colleges.cam.ac.uk). ISL should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

#### Legal basis for processing your data

Unless otherwise stated, the legal basis for processing your personal data is that it is necessary for the performance of the employment contract, contract for services, or membership agreement we hold with you, or for statutory purposes (e.g. processing your monthly salary, tax and pension contributions).

## How is your information used by the College?

Your data is used by us for a number of purposes, including:

A. supporting your employment and your performance in your role:

Personal data includes:

- i)* \* personal details, including name, contact details (phone, email, postal, both work and personal) and photograph;
- ii)* your current and any previous role descriptions;
- iii)* your current and any previous contracts of employment and related correspondence;
- iv)* any occupational health assessments and medical information you have provided, and related work requirements;
- v)* \* your training and development qualifications, requests and requirements.

B. ensuring that you have the right to work for the College:

Personal data includes:

- i)* \* your recruitment information (including your original application form and associated information submitted at that time);
- ii)* other data relating to your recruitment (including your offer of employment and related correspondence, references we took up on your appointment, and any pre-employment assessment of you);
- iii)* \* evidence of your right to work in the UK (e.g. copies of your passport)

C. paying and rewarding you for your work:

Personal data includes:

- i)* \* your bank details;
- ii)* \* details of your preferred pension scheme;
- iii)* your current and previous salary and other earnings (e.g. maternity pay, overtime), and the amounts you have paid in statutory taxes
- iv)* correspondence between you and the College, and between members and staff of the College, relating to your pay, pension, benefits and other remuneration.

In addition, we maintain records of your use or take-up of any benefit schemes provided by us (e.g. healthcare, housing), which we collate and monitor to review the effectiveness of these staff benefits. The legal basis for this processing is that it is in our legitimate interest to ensure that any staff benefit schemes represent good value for money to both you and us, and to ensure that you do not overuse your entitlements.

D. The College Staff Pension Scheme:

Personal data includes:

- i) Your name, gender, age, date of birth, email address, postal address, telephone or mobile number and identifiers such as national insurance number.
- ii) Family details such as details about current marriage and partnerships and marital history, details of family and dependents.
- iii) Employment details such as pensionable pay, length of service, employment and career history, recruitment and termination details, attendance record, health and safety records, security records, job title and job responsibilities.
- iv) Financial details such as income, salary, assets and investments, bank account details to process pension payments, benefits, grants and insurance details;
- v) if you are involved in an appeal in relation to an early retirement due to ill health decision, relevant details in relation to your physical and mental health.

**Who we share your College Staff Pension Scheme data with**

We do not sell, rent or lease your personal information. We share your information with selected recipients who are involved in the running of the Scheme.

**How long will we keep your personal data for the College Staff Pension Scheme?**

Pension benefits are paid over a long period and your right to benefits payable under the College Staff Pension Scheme is based on information that may date back many years. We may decide to delete some of the data held in relation to you after 6 years. However, your personal information may be held for longer where:

- (i) it is required by law or a court order;
- (ii) it is needed to defend or pursue legal claims;
- (iii) we consider it is necessary to ensure the Scheme pays the correct benefits; and (
- (iv) to deal with any queries relating to your benefits as they may arise after that time.

*After the above mentioned retention period has elapsed, we may store your information in an aggregated and anonymised format.*

E. administering HR-related processes, including records of absences and regular appraisals of your performance and, where necessary, investigations or reviews into your conduct or performance:

Personal data includes:

- i) \* records of your induction programme and its completion;
- ii) \* records of your performance appraisals with your line manager;

- iii) records, where they exist, of any investigation or review into your conduct or performance;
- iv) records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave)
- v) correspondence between you and the College, and between members and staff of the College, regarding any matters relating to your employment and/or membership etc. and any related issues (including but not limited to changes to duties, responsibilities and benefits, your retirement, resignation or exit from the College and personal and professional references provided by the College to you or a third party at your request).

F. maintaining an emergency contact point for you:

Personal data includes details of your preferred emergency contact, including their name, relationship to you and their contact details.\*

G. monitoring equality and diversity within the College:

Personal data includes information relating to your age, nationality, gender, ethnicity and disability.\*

H. disclosing personal information about you to external organisations, as permitted or required by law.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below.

Data marked with an \* relate to information provided by you, or created in discussion and agreement with you. Other data and information is generated by the College or, where self-evident, provided by a third party.

We also operate CCTV on our sites, which will capture footage. Our CCTV policy can be viewed at <https://www.trin.cam.ac.uk/website/dpn/>

For certain posts, we may use the Disclosure and Barring Services (DBS) and Disclosure Scotland to help assess your suitability for certain positions of trust. If this is the case, we will make this clear to you in separate correspondence. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information. We recognise that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

## Who we share your data with

For staff and senior members we would normally publish (on our website and elsewhere) your name, photograph (if you have provided one), your email and College contact phone number and basic biographical information relating to your College and University posts.

We share your personal information where necessary and appropriate across the collegiate. The University and its partners (including all of the Colleges) have a data sharing protocol to govern the sharing of staff and members of the College. This is necessary because they are distinct legal entities.

Any transmission of information between partners is managed through agreed processes that comply with UK data protection legislation.

We share relevant personal data with our sub-contracting agents (payroll, Occupational Health, Health and Safety) and with relevant government agencies (e.g. HMRC) and your pension provider. Information is not shared with other third parties without your written consent, other than your name, role and employment contact details that are made publicly available. Except with consent, personal data is not shared outside of the European Economic Area.

We hold all information for the duration of your employment and for no more than twelve months after the end of your employment or cessation of your membership. After that time, we retain a small subset of personal data for up to seven years after your relationship with the College ends:

- I\* personal details, including name and your preferred personal contact details (if we still have these);
- II your previous salaries and other earnings, pensions and the amounts you have paid in statutory taxes;
- III records of your performance appraisals with your line manager;
- IV records, where they exist, of any investigation or review into your conduct or performance;
- V your reasons for leaving and any related correspondence;
- VI any references we have written subsequent to your employment with us.

Those marked with an \* relate to information provided by you, or created in discussion and agreement with you.

We reserve the right to retain the personal data longer than the periods stated above, where it becomes apparent that there is a need to do so – for example, in the event of a major health or personal injury incident, records may need to be kept for up to forty years.

For those former members of staff who remain members of the College Staff Pension Scheme, more detailed records are kept as specified above.

We then store in a permanent archive:

- i) your full name and title;
- ii) your job title(s) or College affiliation(s) and the corresponding dates of employment/membership.

## **Your rights**

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Failure to provide the information reasonably requested of you may result in disciplinary action taken by the College, which could ultimately lead to your dismissal from employment.

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concern>



