

London School of Hygiene & Tropical Medicine Privacy Notice for Staff

London School of Hygiene & Tropical Medicine (a higher education institution established by Royal Charter and an exempt charity with registration number RC000330) of Keppel Street, London, WC1E 7HT, is a data controller for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR). The School undertakes to treat your personal data in accordance with these data privacy laws.

This privacy notice together with our Data Protection Policy, guidance, and any additional documents referred to within them, explains how we process your personal data. Please read this notice carefully. If you have any questions in relation to the School's processing of your personal data, please contact the Data Protection Officer on dpo@lshtm.ac.uk.

This privacy notice applies to School staff, including employees, workers, secondees and contractors.

The School has to process and retain certain personal data relating to you, because of its relationship with you as a member of staff.

How we obtain data about you

We receive data relating to you in various ways, including:

- What you tell us when you express an interest in being a member of staff, either directly, at recruitment events or through a recruitment agent or intermediary;
- What you write in any applications for work;
- What you tell us in your application;
- What you tell us when you apply for a Certificate of Sponsorship (if you need a visa);
- What your referees tell us;
- What you tell us upon enrolment as a member of staff;
- What you tell us during your time as a member of staff at the School;
- Information about you placed into the public domain including through social media (e.g. to record public engagement activities);
- Information created by us that we have to hold about you during your work at the School, such as complaints and disciplinary matters;
- Information we receive from any other person or organisation you work for;
- Information we receive from organisations who disclose information to us as part of their public function, such as UK Visa & Immigration Service or the National Health Service;
- Information we receive from partner organisations including collaborators on research or teaching programmes.

What Personal Data we process about you

We may process the following categories of data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants, if relevant;
- Next of kin and emergency contact information;
- National Insurance number (and/or your home country's national equivalent);

- Bank account details, payroll records, tax status information;
- Salary, annual leave, pension and benefits information;
- Start date;
- Location of employment and/or workplace;
- Copy of driving licence (if driving for work purposes)
- Application and recruitment information (including copies of right to work documentation, references and other information included as part of the application process such as a CV and covering letter);
- Employment records (including job titles, work history, working hours, training record, professional memberships);
- Compensation information;
- Performance information;
- Attendance information;
- Disciplinary information;
- Records of any complaints or grievances you may make;
- CCTV footage and other information obtained through electronic means including swipecard records;
- Information about your use of our information and communications systems;
- Photographs of you.

We may also collect, store and use the following “special categories” of more sensitive personal information:

- Information about your race or ethnicity, religious beliefs, sexual orientation and gender identity;
- Student union membership;
- Information about your health, including any medical condition, health and sickness records;
- Information disclosed to the Student Advice and Counselling Service;
- Genetic information and biometric data; and/or
- Information about criminal convictions and offences, if required, e.g. for safeguarding purposes.

Purposes of Processing

The School has to process personal data about you so that it can provide you with work, as well as the full range of administrative and associated tasks related to your work. This includes:

- Managing the working relationship with you, including monitoring pay, pension, job history, promotions, sickness and other absences, disciplinary matters, grievances and complaints;
- Timetabling and facilities management;
- Financial administration, e.g. management of nominal accounts under your control;
- Publishing accurate staff information on the intranet and public-facing website;
- Providing support including occupational health referrals;
- Internal and external marketing of the School’s work including events, research and publications.

Legal Basis for Processing Your Personal Data

We will process your personal data under the following legal bases:

To perform the staff contract

Where you have entered into an employment contract or another type of contract to perform work for the School, we will process your personal data so that both parties can perform that contract. Examples include managing HR processes, paying you and providing advice and support. We would not be able to work with you without this information.

To meet our obligations to staff and exercise our rights

In some instances we must process special categories of data e.g. health information, trade union membership, racial or ethnic origin, religious belief etc. We will do so on this basis (rather than on the basis of consent) in our role as your employer, and/or the organisation receiving the benefit of your work. Examples of this include ensuring that we have a record of your relevant health, next of kin and personal information before you travel on School business, particularly where a risk assessment requires it.

For a task carried out in the public interest

The School's Royal Charter empowers it to perform certain functions to operate as a higher education institution. These functions include "promoting ... research... and education in public health and tropical medicine and such other academic subjects as [the School] may consider appropriate". Along with the contract you have with the School, we will rely on this basis for the majority of the processing we do of your personal data.

Compliance with a legal obligation

In certain circumstances we need to process your personal data to comply with a legal obligation. Examples include compliance with immigration rules and guidance set out in law and by the Home Office, compliance with equality legislation under the Equality Act 2010, and compliance with rules and guidance set out by the Office for Students.

Legitimate interests

We will occasionally process your personal data for purposes that are not a core part of the School's activities but are nonetheless in the legitimate interests of the School and also in the interests of staff. Examples of this would be the lawful and reasonable use of CCTV and visual monitoring technologies for prevention and detection of criminal activity or behaviour which could lead to disciplinary investigation, internal and external marketing, applications for charter marks and awards (such as Stonewall and Athena Swan charter marks), and staff surveys carried out as part of the School's commitment to improvement.

Those present at graduation ceremonies and certain other key events may have their names recorded in the event programme, and may be recorded in photographs and audiovisual records of the event. In certain limited circumstances you may request to object to such processing of your personal data, in which case please contact the Events team with at least six weeks' prior notice of the event and complete a form requesting to object to the processing, which can be found by following the links at www.lshtm.ac.uk/dpo.

Your consent

Whilst we do not expect it to be the case, we may need to process your data outside the lawful bases set out above. If this happens, we will seek your consent to process your data for that purpose. We will explain to you how you can withdraw your consent at the time of you giving it. If

you do withdraw consent, this will not affect the lawfulness of processing based on your consent before your withdrawal.

As part of the initial employment process the School requests consent to use your personal data for:

Providing contact details (name, job title and department) to those Trade Unions recognised by the School.

Emergency use to protect vital interests

In exceptional circumstances, the School may process your personal data to protect your own and/or other people's vital interests. An example of this would be if the School needed to release information about you to an embassy so that you and/or others could receive urgent consular assistance.

Sharing your personal data with other bodies

We may need to share your personal data with other bodies. The main examples of this are as follows:

- Recruitment agencies;
- Organisations with whom you seek or wish to maintain accreditation;
- Organisations which fund your research or students;
- Organisations, including UK and overseas charities and government bodies, with whom the School has a contractual or collaboration agreement for teaching or research;
- Statistical returns – we submit returns to the government and its agencies including the Office for Students, the Higher Education Statistics Agency (HESA), and organisations which offer charter marks such as Stonewall and Athena Swan. This may include sensitive data for equality monitoring purposes, though usually these will have been aggregated and/or anonymised;
- Home Office – if you are working on a visa, and particularly on a Tier 2 or 5 visa, both you and the School must comply with Home Office rules, and you must meet the terms of your visa, as well as all School requirements arising from our duties and obligations as a Home Office Tier 2 sponsor licence holder. We must report certain changes of circumstances to UK Visas and Immigration. The Home Office may also make other lawful requests for information about students.
- Other higher education institutions – if you are registered on a programme which is delivered in collaboration with another higher education institution, we may need to transfer some of your personal data to that party;
- Our suppliers and service providers – we may use service providers to store or in some cases process personal data on our behalf.
- Third parties we must share your personal data with, to comply with a legal or regulatory duty, such as the police or the tax authorities.

We may also disclose your personal data where this is strictly necessary to enforce or apply the contract in place with you or to investigate potential breaches of it or where this is necessary, in our view, to protect the rights, property or safety of others including our staff and students.

As part of routine business correspondence email addresses and business contact details will be shared with third parties.

Transfers of personal data outside the EEA

When we share your personal data with a third party as set out above, these may involve the use of cloud computing solutions, and/or transferring your personal data to a recipient outside of the European Economic Area. Where we do this, and the recipient is in a country which the European Commission has decided does not have adequate data protection laws, we will make sure that appropriate safeguards are in place to protect your information and your rights under privacy law.

Retention of your personal data

After you have begun your work with the School, we will hold your personal data for the amounts of time specified in our data retention schedules relating to staff data. Within a reasonable time after termination of your work for the School, we will take reasonable steps to remove it securely from our systems. Please note some items of your personal data will be retained following your termination, as set out in the retention schedule.

Please note however that even after termination of your employment, the School may still need to retain your personal data to satisfy its obligations to keep certain records for particular periods under applicable law as per the School's retention schedule.

Contact details relating to staff data

If you are a member of staff and would like to update your contact details this can be done via MyView or by contacting HR.

If you want further information about how your personal information is used or want to correct, restrict or erase personal details, please consult www.lshtm.ac.uk/dpo or dpo@lshtm.ac.uk.