

# NOC All Staff Privacy Notice

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## **Purpose**

This privacy notice covers the personal data that you supply to **The National Oceanography Centre** (NOC) relating to your employment with NOC. The organisation is committed to being transparent about how it collects, stores and processes your data and to meeting its data protection obligations.

## **What is the legal basis for NOC processing your personal information?**

The lawful basis we rely on for processing your personal data is article 6(1)(b) of the GDPR, which relates to processing necessary to perform a contract (ie employment contract) or to take steps at your request, before entering a contract.

If you provide us with any information about reasonable adjustments you require under the Equality Act 2010 the lawful basis we rely on for processing this information is article 6(1)(c) to comply with our legal obligations under the Act.

The legal basis we rely on to process any information you provide as part of your application which is special category data, such as health, religious or ethnicity information is article 9(2)(b) of the GDPR, which relates to our obligations in employment and the safeguarding of your fundamental rights. And Schedule 1 part 1(1) of the DPA2018 which again relates to processing for employment purposes.

We process information about applicant criminal convictions and offences. The lawful basis we rely to process this data are Article 6(1)(e) for the performance of our public task. In addition we rely on the processing condition at Schedule 1 part 2 paragraph 6(2)(a).

## **What personal information does NOC process?**

NOC collects and processes a range of information about you. We do not collect more information than we need to fulfil our stated purposes and will not keep it longer than necessary. This includes (as applicable):

- information provided by you such as your name, address and contact details, including email address and telephone number, date of birth and gender.
- the terms and conditions of your employment.
- details of your qualifications, skills, experience and employment history, including start and end dates, with previous employers and with the NOC.
- information about your pay and benefits.
- details of your bank account and national insurance number.
- information about your marital status, next of kin, dependants and emergency contacts.
- information about your nationality and entitlement to work in the UK.
- information from references.
- information on Disclosure and Barring Service (DBS) checks including the outcome of the checks.
- details of your work pattern (days of work and working hours).
- details of periods of leave taken by you, including holiday, sickness and other absence, and the reasons for the leave.
- details of any disciplinary or grievance procedures in which you have been involved, including any warnings issued to you and related correspondence.
- performance management information, including annual appraisals, performance development reviews (PDR) and ratings, training you have participated in, performance improvement plans and related correspondence.
- information about medical or health conditions, including whether or not you have a disability for which the organisation needs to make reasonable adjustments.
- equal opportunities monitoring information, including information about your ethnic origin, sexual orientation, health and religion or belief.
- other relevant information as applicable required by NOC in order to ensure we fulfil our obligations as an employer.

The NOC collects this information in a variety of ways.

For example, data is collected through application forms and CVs; obtained from your passport or other identity documents; from forms completed by you at the start of or during

employment (such as benefit nomination forms); from correspondence with you; or through interviews, meetings or other assessments.

You are also able to directly update some of the information held on your record on NOC's Business Information System - UNIT 4, and to view the other fields in your record.

In some cases, the organisation collects personal data about you from third parties, such as references supplied by former employers and information from criminal records checks permitted by law.

Data is stored in a range of different places, including in your electronic personnel file, in NOC's Business Information System, the flexitime tracking system and across other IT systems (including the organisation's network drives and email system).

### **Who has access to data?**

NOC restricts access to personal data on an as-needs-basis. Your information will be shared within People & Skills team (including external managed services covering payroll, flexible benefits, occupational health), your line manager, managers in the business area in which you work and senior managers and IT staff if access to the data is necessary for performance of their roles.

Your data could also be shared with employee representatives in the context of collective consultation on a redundancy or merger, if such a situation were to arise. This would be limited to the information needed for the purposes of consultation, such as your name, role and length of service.

Relevant data (e.g. mobile number) may also be shared for the purposes of the organisation's Business Continuity Plan or Serious Incident Group procedures.

Your data may also be shared for the purposes of audit compliance and may be transferred to countries outside the European Economic Area (EEA) for information required within the NOC or for audit or compliance purposes, including EU funded grant activity. Data will only be transferred outside the EEA where required and where adequate safeguards such as an International Data Agreement or contract are in place.

### **Do we use any data processors?**

NOC engages with a number of third party processors in providing elements of our business processes:

- We use Automatic Data Processing, Inc (ADP), to manage our payroll. Here is a link to the [ADP privacy notice](#).
- We use the Agenda Screening Services to complete Disclosure and Barring Service checks. Here is a link to the [Agenda privacy notice](#).
- We use Edenred for the provision of wellbeing and lifestyle benefits. Here is the link to the [Edenred privacy notice](#).

- We use Legal and General for benefits such as life insurance and Group Personal Pension Plans. Here is the link to the [Legal and General privacy notice](#)
- We use Solent NHS Trust for the provision of our occupational health services in Southampton. Here is the link to the [Solent NHS Trust UK Privacy Notice](#)
- We use the Well-Travelled Clinics in the provision of our occupational health services in Liverpool. Here is the link to the [Well-Travelled Clinics Privacy Notice](#)
- We use Southampton Travel Health Clinic in the provision of our immunisation services. Here is the link to the [Southampton Travel Health Clinic Ltd Privacy Policy](#)
- We use Health Assured in the provision of our Employee Assistance Program. Here is the link to the [Health Assured privacy notice](#).
- We use Health Management to administer additional medical schemes for legacy TUPE staff. Here is the link to the [Maximus UK Privacy Policy](#)

### **How does NOC protect data?**

NOC takes the security of your data seriously. The organisation has internal policies and controls in place to ensure that your data is always secure, not lost, accidentally destroyed, misused or disclosed, and is only accessed as required by its employees in the performance of their duties.

Where the organisation engages third parties to process personal data on its behalf, they do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

### **How long does NOC keep data?**

During your employment, NOC will retain your personal information and ensure it is up to date and accurate. After you leave the organisation, we will retain only key information such as job and salary records for one year and we will delete your record entirely after 6 years, unless we are required to maintain data for a longer period for compliance or donor reporting reasons.

### **Your rights as a NOC employee**

As a data subject, you have a number of rights. You can:

- access and obtain a copy of your data on request;
- require the organisation to change incorrect or incomplete data;
- require the organisation to delete or stop processing your data, for example where the data is no longer necessary for the purposes of processing;
- object to the processing of your data where the organisation is relying on its legitimate interests as the legal ground for processing;
- ask the organisation to stop processing data for a period if data is inaccurate or there

is a dispute about whether or not your interests override the organisation's legitimate grounds for processing data.

If you would like to exercise any of these rights or discuss your personal information, please contact NOC's Legal and Governance team on [governance@noc.ac.uk](mailto:governance@noc.ac.uk). In the event that NOC is unable to adequately address any concerns you may have about the way in which we use your data, you have the right to lodge a formal complaint with the data protection authority in your country or the UK main data protection regulator, the Information Commissioner's Office (ICO). Full details may be accessed on the complaints section of the Information Commissioner's Office website. Here is the link to [ICO complaints](#)

### **What if you do not provide personal data?**

You have some obligations under your employment contract to provide the organisation with data. In particular, you are required to report absences from work and may be required to provide information about disciplinary or other matters under the implied duty of good faith. You may also have to provide the NOC with data in order to exercise your statutory rights, such as in relation to statutory leave entitlements. Failing to provide the data may mean that you are unable to exercise your statutory rights.

Certain information, such as contact details, your right to work in the UK and payment details, have to be provided to enable the organisation to enter a contract of employment with you. If you do not provide other information, this will hinder the organisation's ability to administer the rights and obligations arising as a result of the employment relationship efficiently.

### **Automated decision-making**

Employment decisions are not based solely on automated decision-making.

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### **About this Privacy Notice**

From time to time, we may need to change this privacy notice, for example, if we introduce new data into our business processes supporting your employment contract. We will inform NOC staff when a new privacy notice is published.

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