

**Note:** Reference in this notice to "The School", "we" and "LSE" refers to London School of Economics and Political Science ([www.lse.ac.uk](http://www.lse.ac.uk)).

Reference to "you", "your" refers to staff engaged by London School of Economics and Political Science. For these purposes "staff" include casual, hourly, salaried, atypical, fixed-term, open-ended subject to funding, permanent and agency staff. This notice relates to information about you (Staff) which will be collected and processed by London School of Economics and Political Science and passed to relevant organisations under GDPR (2018) as described below.

## **1. Employee privacy notice**

- 1.1 This notice is for all London School of Economics and Political Science staff and explains the purpose for which LSE holds information about you (i.e. your personal data).
- 1.2 'Personal data' means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, staff identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person. (Article 4 - GDPR, 2018).
- 1.3 This privacy notice is in accordance with General Data Protection regulation (GDPR), in effect from 25<sup>th</sup> May 2018. The London School of Economics and Political Science is registered with the Information Commissioner's Office (ICO) for the purpose of Data Protection.
- 1.4 Staff personal data is kept in accordance with the School's Data Protection Policy and GDPR 2018 and is kept securely and used only for legitimate purposes in connection with your employment.
- 1.5 If you wish to obtain further information about the School's registration, it can be viewed at the Register of Data Controllers (LSE registration number: Z7044954). Further information can also be obtained from the Information Commissioner's Office.

## **2. Legal basis for processing data**

- 2.1 Most of the data we collect from you is required to enable us to meet statutory obligations and our contractual obligations to you (legal), appraise your work performance within your role and provide necessary support and facilities that will enable you to carry out your work duties (duty of care) including compliance with Health and Safety at Work. The provision of this data is part of the contract you form with the School when you accept an offer of employment. This is covered by the lawful basis in Article 6(1)(b) of the GDPR. The lawful basis in Article 6(1)(c), legal, will apply to any processing done for statutory or other legal reasons such as processing of visas.
- 2.2 Your personal data may include 'special categories of data' as described under the GDPR. Such special categories will include racial or ethnic origin, religious or philosophical beliefs, trade union membership, data concerning health or data concerning a natural person's sexual orientation. Consent will be requested to process this data at the time of collection where the lawful basis in Article 9(2)(b) social protection/employment law does not apply
- 2.3 The School may process data relating to criminal convictions if your employment requires a Disclosure and Barring Service Check or your conviction is not spent. Particular safeguards will be put in place for the collection and processing of special categories of data and criminal convictions. The condition in Schedule 1, Part 1, Section 1 of the DPA 2018 covers this processing.

## **3. Why we collect staff data?**

- 3.1 The School needs to collect, retain and process information about you (including personal data) for reasons related to recruitment or your employment by the School.

### 3.2 The School collects and processes data for the following reasons:

- To recruit staff
- To manage your employment with the School including payroll and pension processing
- To comply with statutory obligations and duties i.e. Public Sector Equality Duty, Health and Safety reporting, HRMC notification etc.
- To manage the security of the school and access to premises and facilities.
- Other planning activities that fall within the pursuit of the School's legitimate business.
- To manage relations with unions.

## 4. What Information is being collected?

### 4.1 Information that is collected and processed from you includes:

- your name, photograph, 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 LSE;
- information about your remuneration, including entitlement to benefits such as pensions or insurance cover;
- 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 right to work in the UK;
- data relating to your criminal convictions and offences, where appropriate;
- details of your schedule (days of work and working hours) and attendance at work;
- details of periods of leave taken by you, including holiday, sickness absence, family leave and sabbaticals, 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;
- assessments of your performance, including appraisals, performance reviews and ratings, performance improvement plans and related correspondence;
- information about medical or health conditions, including whether or not you have a disability for which the school needs to make reasonable adjustments; and
- information about protected characteristics, such as your ethnic origin, sexual orientation and religion or belief, which is required for equal opportunities monitoring
- details relating to trade union membership including: subscriptions deducted from payroll; reporting and publishing of time spent on trade union activities and duties under the government's publication scheme; individual members reporting to their line managers when they attend to trade union duties and activities (branch meetings); grievances and other processes where data is shared with union representatives; representative details including communications with their managers and as attendees in notes of JNICC/JNCC/EJNICC meetings.
- details relating to strike action, and reporting who is taking part in strikes.
- details relating to provision of IT equipment, accounts and support.
- details relating to monitoring of IT accounts, as set out in the [Monitoring and Logging Policy](#).

- Recording of Teams meeting attendance.
- 4.2 The School also needs to process your personal data for legitimate purposes in connection with access to the school's campus, personal safety and security, visitor management and administration. The School processes your personal data including LSE staff ID card information for the following purposes:
- Access to, and security of, the School facilities;
  - Visitors and external contractors attendance and works management
  - Fire emergency, incident management, accident and investigations;
  - Administration and provision of facilities and support services (such as building and room keys, temporary one day passes, library access to external visitors, etc.);
  - Carrying out statutory duties to provide information to external agencies such as the police (see 'Disclosures' for further details);
  - Statutory reporting to comply with Health and Safety at Work Act;
  - Processing for Crown honours.

## **5. Processing of personal data**

- 5.1 LSE needs to process data to enter into an employment contract with you and to meet its obligations under your employment contract. For example, LSE needs to process your data to provide you with an employment contract, to pay you in accordance with your employment contract and to administer various entitlements.
- 5.2 In some cases, the School needs to process data to ensure that it is complying with its legal obligations. For example, it is required to check an employee's right to work in the UK, to deduct tax, to comply with Health and Safety laws and to enable employees to take periods of leave to which they are entitled.
- 5.3 The School has a legitimate interest in processing personal data before, during and after the end of the employment relationship. Processing employee data allows the School to:
- run recruitment and promotion processes;
  - maintain accurate and up-to-date employment records and contact details (including details of who to contact in the event of an emergency), and records of employee contractual and statutory rights;
  - operate and keep a record of disciplinary and grievance processes, to ensure acceptable conduct within the workplace;
  - operate and keep a record of employee performance and related processes, to plan for career development, and for succession planning and workforce management purposes;
  - operate and keep a record of absence and absence management procedures, to allow effective workforce management and ensure that employees are receiving the pay or other benefits to which they are entitled;
  - obtain occupational health advice, to ensure that it complies with duties in relation to individuals with disabilities, meet its obligations under health and safety law, and ensure that employees are receiving the pay or other benefits to which they are entitled;
  - operate and keep a record of other types of leave (including maternity, paternity, adoption, parental and shared parental leave), to allow effective workforce management, to ensure that the School complies with duties in relation to leave entitlement, and to ensure that employees are receiving the pay or other benefits to which they are entitled;
  - ensure effective general HR and business administration;

- provide references on request for current or former employees;
  - respond to and defend against legal claims;
  - track and trace Covid-19 symptoms, while the Covid-19 epidemic is ongoing;
  - maintain relations with trade unions;
  - maintain and monitor IT equipment and accounts;
  - maintain and promote equality and diversity in the workplace.
- 5.4 Some special categories of personal data, such as information about health or medical conditions, is processed to carry out employment law obligations (such as those in relation to employees with disabilities). Moreover, LSE may also process other special categories of personal data, such as information about ethnic origin, sexual orientation, health or religion or belief, which is done for the purposes of equal opportunities monitoring only and to provide anonymised statistical reports.
- 5.5 The School will routinely publish some sources of information about LSE that include personal data. These may include staff work telephone / email directory, graduation programmes and audio-visual representations of graduation ceremonies, prospectuses, annual reports, newsletters and staff profiles on the School website.
- 5.6 The School has selected personnel files for staff at Grade 8 and above for historic archiving. These staff files will be identified at the termination of employment and after 6 years retention in the HR Division will then be transferred to the School Archive. They will only be made available for research after an appropriate closure period and data protection assessment.

## **6. How is data collected?**

- 6.1 London School of Economics and Political Science may collect this information in a variety of ways. For example, data might be collected through job application forms, CVs or resumes; obtained from your passport or other identity documents such as your driving licence; 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.
- 6.2 In some cases, the School may collect personal data about you from third parties, such as references supplied by former employers, information from employment background check providers, and information from criminal records checks permitted by law. Please note LSE seeks information from third parties with your consent only.

## **7. Data Storage**

- 7.1 Data will be stored in a range of places, including in your personnel file, in the School's HR management systems, recruitment system, Finance systems and in other IT systems (including the LSE's email system).

## **8. Disclosures to third parties**

- 8.1 The School will disclose your data to third parties where this supports the administration of recruitment, your employment or where we are legally obliged to. This includes sharing with legal representatives where relevant.
- 8.2 The processing of some data is required so that the School can fulfil its obligation to third parties such as the Higher Education Statistics Agency (HESA); pension administrators including Superannuation Arrangements of the University of London (SAUL), Universities Superannuation Scheme (USS) and the Prudential MPAVC Fund; or its statutory obligations under the Equality Act 2010. The processing of some of this information may be undertaken on the School's behalf by organisations contracted for that purpose. Such organisations will be bound by an obligation to process data in accordance with data protection regulations, GDPR 2018 and any specific contractual obligations with the School. The minimum personal information necessary for fulfilling that contract will be passed to the third party for these purposes.

- 8.3 In order to process your recruitment and employment effectively, the School deploys IT systems. These systems may entail the transfer of data to a third party. Any such transfer will be covered by a specific contract that will include protection of personal data.
- 8.4 Details where the School transfers personal data are contained in the table below:

Disclosure to:	Details:
<b>Data processors and storage</b>	MyHR – HR information system supported by iTrent for the collection and processing of HR and employee information for the processing of payroll  Engage – ATS; Recruitment management system, hosted and supported by Havas People, which is used for the recruitment of staff.
UK Visa and Immigration ( <b>UKVI</b> )	As required in carrying out right to work permit checks.
Collection of a tax or duty i.e. <b>HMRC</b>	Benefit of Tax Inspectors.
The <b>Higher Education Statistics Agency (HESA)</b>	You are advised to refer to the collection notices on the <a href="#">HESA</a> website for further details
<b>DBS</b> (Disclosure and Barring Service)	As required in carrying out criminal convictions, disclosure and barring checks in line with School's policy.
<b>UK Agencies</b> with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, collection of a tax or duty, or safeguarding national security	For example: Benefit or Tax Inspectors, the Police, the UK Visa and Immigration (UKVI), DBS (Disclosure and Barring Service) or the Foreign and Commonwealth Office, as necessary, and with consideration of your rights and freedoms.

## 9. How does the School protect data?

9.1 London School of Economics and Political Science takes the security of your data seriously. We have internal policies and controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by its employees in the performance of their duties.

## 10. How long does the organisation keep data?

10.1 The organisation will hold your personal data as stipulated in the School's data retention schedule (required by GDPR). The periods for which your data is held after the end of employment are also set out in the Document Retention Schedule (required by GDPR).

## 11. Your rights

11.1 Under GDPR (2018), 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 grounds for processing.

11.2 Any request for such a copy should be made to the school's Data Protection Officer (glpd.info.rights@lse.ac.uk). Any such request should be submitted in writing.

11.3 If you believe that the School has not complied with your data protection rights, you can contact the Information Commissioner.

## **12. Your Responsibilities**

12.1 Under GDPR 2018, you have some obligations under your employment contract to provide the School with data which can be done through MyView – London School of Economics and Political Science’s self-service portal and should notify the School of any changes.

12.2 You have a responsibility to keep your personal details accurate and up to date and should notify the School of any changes.

12.3 Staff at LSE may, during the course of their employment, have access to personal data about other individuals. Staff are expected to treat any personal data relating to other people which may be accessed whilst at the School in a responsible and professional manner, in line with the School’s Data Protection Policy. This responsibility is in addition to any obligations arising from professional ethics or codes of conduct.

12.4 Information obtained in the expectation of a duty of confidence should be treated confidential and generally not disclosed without the subject’s consent.

12.5 LSE will take a serious view of any breach of GDPR 2018 and data protection regulations by any of its members, including the consideration for disciplinary action.

Last update: 02/10/2024

## Staff Data Retention Schedule

### Human Resources

	Retention Trigger	Retain For	Action	Information Asset Owner
Employee Files and Personal Development Records	End of Employment	6 years	Destroy	Director of Human Resources
Change of personal details notifications	No longer than 6 months after receiving this notification	6 months	Destroy	Director of Human Resources
Disciplinary and Grievance, Examination and Testing, Accident and Ill Health	Last Action	6 years or relevant HR policy	Destroy	Director of Human Resources
Job Descriptions and Terms & Conditions	Last Action	6 years	Destroy	Director of Human Resources
Training Material	Superseded	6 years	Destroy	Director of Human Resources
Political Declarations	Superseded or End of Employment	6 years	Destroy	Director of Human Resources
Industrial Relations	Last Action	6 years	Destroy	Director of Human Resources
Payroll Sheets	End of Financial Year	6 years	Destroy	Director of Human Resources
Maternity, Paternity, Adoption and Sick Leave	End of Financial Year after return	6 years	Destroy	Director of Human Resources
Successful Recruitment Candidate Information (including third party referee details provided by the applicant)	Start of Employment	6 months	Destroy	Director of Human Resources
Unsuccessful Recruitment Candidate Information (including third party referee details provided by the applicant)	Successful appointment of a candidate	6 months	Destroy	Director of Human Resources
Staff Pension, Pay History, and Termination Reasons	End of Employment	100 years	Destroy	Director of Human Resources



Health Surveillance	Last Action	40 years	Destroy	Director of Human Resources
Third party emergency contact details provided by the staff member	End of Employment	Immediate	Destroy	Director of Human Resources
Equality and Diversity Published Information	Last Action	6 years	Review	Director of Human Resources
Annual leave records	Last Action	6 years	Destroy	Director of Human Resources
Immigration checks	End of Employment	2 years	Destroy	Director of Human Resources
DBS checks and disclosures of criminal records forms	As soon as practicable after the check has been completed and the outcome recorded	6 months	Destroy	Director of Human Resources
Right to work documentation including identification documents	End of Employment	2 years	Destroy	Director of Human Resources
Training Record	End of employment	6 Years	Destroy	Director of Human Resources
Parental Leave	Last Action	18 Years from Birth of Child	Destroy	Director of Human Resources
Senior Executives Records (staff at Grade 8 and above)	Last Action	Do Not Destroy – permanent	Transfer to archive	Director of Human Resources
Committee Council Meeting Minutes	Last Action	Do Not Destroy - permanent	Transfer to archive	Director of Human Resources
Trade Union Agreements	Last Action	Do Not Destroy	n/a	Director of Human Resources