

PRIVACY NOTICE FOR STAFF, JOB APPLICANTS AND OTHERS WORKING AT THE WREXHAM UNIVERSITY

This privacy notice applies to current and former employees, workers, contractors, honorary position holders, volunteers and visiting lecturers. It explains how we'll process your personal data. This notice does not form part of any contract of employment or other contract to provide services.

What information do we hold?

We hold a range of personal data about you, some of which you provide to us directly and some of which we receive from third parties.

Here are some examples of types of personal data we hold:

- Personal details such as name, title, date of birth, gender, marital status and dependents
- Contact details such as address, telephone number and personal email address
- Next of kin and emergency contact information
- National Insurance Number
- Bank account details, payroll details and tax status information
- Salary, annual leave, pension and benefits information
- Location of employment or workplace
- Recruitment information (including copies of qualifications, right to work documentation, driving license references and other information included in a CV or cover letter or as part of the application process)
- Employment records (including job titles, work history, working hours, training records and professional memberships)
- Immigration information (for example passport details and language proficiency)
- Performance information
- Disciplinary and grievance information
- CCTV footage (including body-worn cameras) and other information obtained through electronic means such as swipe card records
- Information about your use of our IT systems
- ID card image and photographs
- Location data gathered through logging into University Eduroam WIFI in campus buildings, including teaching and learning spaces and public areas. Location data gathered through the use of logging in via staff cards.
- Username data gathered through logging into University Eduroam WIFI in campus buildings, including teaching and learning spaces and public areas. This is gathered solely to support the NHS Test and Trace system and is kept for a strictly limited period of time.

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

- Information about your race or ethnicity, disability, age, religious beliefs, gender reassignment, sexual orientation, political opinions, marriage and civil partnership and pregnancy and maternity
- Trade union membership
- Information about your health, including any medical condition, health and sickness records
- Information about any criminal convictions, offences and barred list status
- Health information where a staff member either self-reports symptoms of infectious illnesses, e.g. Covid 19 or Mumps, or where the University is informed by Public Health or NHS bodies.

How do we use it and why?

We process your personal data to help us to effectively administer the employment relationship between you and the University.

We only process data for specified purposes and if it is justified in accordance with data protection law. The table below lists the various reasons why we process personal data and the justification for it.

Some processing of your personal data is justified on the basis of contractual necessity. In general this applies to personal data you provide to us at when you first start working for us and throughout the duration of your employment with the University. It's to manage the employment relationship and to monitor performance

Without this information we wouldn't be able to employ you and follow the law, assess your application, offer you work with the University or make reasonable adjustments. Some personal data is also required to fulfil our legal obligations (for example, immigration or HMRC).

WHY WE PROCESS YOUR DATA		
Purpose	Lawful Basis	Justification
To make a decision about your recruitment or appointment	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary prior to entering into an employment contract and to comply with employment law.
To determine the terms on which you work for us	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary prior to entering into an employment contract and to comply with employment law.
To allocate and manage work responsibilities	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary prior to entering into an employment contract and to comply with employment law.
To pay salary, tax and pension contributions and process associated benefits	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary prior to entering into an employment contract and to comply with employment law.
To manage performance and conduct	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary prior to entering into an employment contract and to comply with employment law.
To manage training and development needs and opportunities	<ul style="list-style-type: none"> <u>Contract</u> 	Necessary for the performance of the employment contract.

<p>To support the administration and application of professional accreditations and chartermarks</p>	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Legitimate Interest</u> 	<p>Professional accreditation demonstrates the organisation's commitment to meet high professional standards Data will generally be shared in aggregated and anonymised format, but where personally identifiable data is shared (pictures/pen portraits) these will be shared with your consent.</p>
<p>To monitor equality, diversity and inclusion</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Necessary for our legal obligation to promote an inclusive work environment and to comply with Employment Law and our other legal obligations including the Equality Act 2010.</p>
<p>To provide IT services, building access and library services</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	<p>Necessary for the performance of the employment contract. For non-essential library users, the legal basis for this processing is Legitimate Interest.</p>
<p>To implement and ensure compliance with University policies</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	<p>Necessary for the performance of the employment contract, and to comply with University policy, employment law and ICO Code of Practice.</p>
<p>To carry out surveillance via CCTV including body-worn cameras for the prevention, reduction, detection and investigation of crime and other incidents to ensure the safety of staff, students and visitors; to assist in the investigation of suspected breaches of University regulations by staff or students; and the monitoring and enforcement of traffic related matters.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	<p>The University has a legitimate interest in ensuring that its campuses are safe places to work, live and study. It has a statutory duty of care to its staff and students to ensure a safe environment. Where individuals use car parking facilities, they have entered into a contract with terms and conditions that require surveillance for monitoring purposes.</p>
<p>To assess, monitor and manage fitness and capability to work and manage sickness absence</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	<p>Necessary for the performance of the employment contract and to comply with employment law.</p>
<p>To manage health and safety incidents including statutory reporting and medical referrals</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> 	<p>Compliance with the Health and Safety at Work etc Act 1974.</p>

To monitor exposure of Estates staff to vibration from University-provided mechanical equipment.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law
To manage regrading and promotion processes.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law.
Providing management information and testing functionality of HR system developments	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	Necessary for the performance of the employment contract, to comply with Employment Law and our legitimate interests to ensure HR systems operate securely and efficiently and, also, to inform management decisions.
To communicate with you as an applicant (including to survey you about your experiences) and during your employment.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	Necessary for the performance of the employment contract and to comply with employment law and our other legal obligations and our legitimate interest in consulting with staff and raising awareness of initiatives and opportunities.
To provide you with employment-related benefits	<ul style="list-style-type: none"> • <u>Contract</u> 	Necessary for the performance of the employment contract.
To liaise with your pension provider	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law.
To sponsor international staff to work in the UK	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	Necessary for the performance of the employment contract and to comply with Employment Law and our other legal obligations.
To check right-to-work status and support visa applications	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	Necessary for the performance of the employment contract and to comply with Employment Law and our other legal obligations.
To submit grant funding applications and/or enter into grant funding agreements with funders, including, but	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Public Task</u> 	Necessary to enable the University to access funding resources to allow it to carry out research.

not limited to the UKVI, and/or share information with other institutions leading on a funding application. Monitoring information is shared with the UKRI in aggregated form.		
To gather evidence for possible disciplinary or grievance investigations, meetings and hearings.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law.
To make decisions about your continued employment or arrangements for the termination of our working relationship	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law.
To provide references on request	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Contract</u> 	Necessary for the performance of the employment contract for applicants or where consent has been given.
To assess suitability and eligibility to undertake work at the University (including pre-employment checks, for instance, asking for references, pre-screening questions, asking about unspent criminal convictions)	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> • <u>Legitimate Interest</u> 	Necessary for us to engage with you on the process of establishing a contract (contractual necessity). To fulfil the legal duty of an employer to ensure the safety and welfare of its staff and students (compliance with a legal obligation) and our legitimate interest.
Providing services administered by key suppliers including travel, insurance, accommodation and vehicle hire.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> 	Necessary for the performance of the employment contract and to comply with employment law.
Carrying out internal research and analysis for non-academic purposes including monitoring performance and quality at an institutional level and where there is no direct impact on data subjects.	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	Legitimate interest in ensuring that the University is able to benefit its staff and students through understanding how they are impacted by its practices and enacting continuous improvement to its policies, processes and technologies.
Basic departmental contact details published internally and externally on staff lookup and/or team websites	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	Necessary for the purposes of contracts and collaboration agreements, in the legitimate interest of the University to fulfil those obligations within agreements.

<p>For the purpose of conducting competitions and recognition schemes, making awards and giving prizes.</p>	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	<p>There is a clear and established benefit to the University being able to run competitions and award excellence.</p>
<p>For staff living in University- managed accommodation, administering matters relating to that accommodation including fees, health and safety, catering, cleaning and maintenance and disciplinary procedures.</p>	<ul style="list-style-type: none"> • <u>Contract</u> 	<p>Contractual necessity. The accommodation service may use personal email addresses for the purposes of communicating with staff living in University-managed accommodation.</p>
<p>To understand reasons for staff leaving the organisation and to identify and address any issues raised through exit surveys and/or exit interviews</p>	<ul style="list-style-type: none"> • <u>Legitimate Interest</u> 	<p>It is a legitimate interest of the University to be able to identify the general trends for staff leaving the University in order to improve retention as well as the ability to address any issues raised at both organisational and/or departmental level in order to provide continuous improvement to the overall staff experience whilst at the University.</p>
<p>To maintain the health of our entire campus population, by monitoring staff movements around campus to enable effective Test and Trace processes during global health events.</p> <p>To identify those affected through Health Screening and Self Reporting.</p>	<p>The University is under a <u>legal obligation</u> to ensure health and safety of employees, students and visitors and those affected by its undertaking.</p> <p>It is in the University's <u>legitimate interests</u> (ensuring wellbeing and minimising risk to the public as well as the delivery and continuance of operations).</p> <p>It is the <u>public interest</u>.</p>	<p>Compliance with relevant national Health & Safety legislation and any national legislation brought in in the event of a Global Health Emergency.</p> <p>Legitimate Interest in ensuring that the University is a safe and healthy environment for all students, staff and visitors.</p>

To keep records of correspondence between the University and a member of staff	<ul style="list-style-type: none"> • <u>Contract</u> 	Contractual necessity
Shared with third-party contractors providing services on behalf of the University such as training providers, apprenticeships, software solutions.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> 	Necessary for the purposes of the contract with the third party and the legitimate interest of the University to provide services to staff and to comply with ICO recommendations where data processing occurs.

There may be other processing in addition to the above. This is done on the basis of our policies and we'll inform you at the time when the data is obtained or as soon as possible afterwards.

Where the basis of processing your personal data is contractual necessity and you don't provide us with the personal data needed, the University may not be able to fulfil its employment contract with you (such as paying you) or we may be prevented from complying with our legal obligations (such as to ensure the health and safety of our workers).

HOW WE PROCESS PARTICULARLY SENSITIVE INFORMATION	
Purpose	Legal Basis & Justification
We use information relating to your health to make reasonable adjustments that are needed to support you at work and for equal opportunities monitoring	<ul style="list-style-type: none"> • <u>Legal Obligation</u> <p>Specific condition: To enable the University to carry out its obligations under the Equality Act 2010 and to monitor equal opportunities</p>
We use information about your race or ethnicity, religious beliefs, sexual orientation, marital or civil partnership status and political opinions to conduct equal opportunities monitoring.	<ul style="list-style-type: none"> • <u>Legal Obligation</u> <p>Specific condition: To enable the University to carry out its legal obligation under employment law and Equality Act 2010 and to monitor equal opportunities.</p>
We use trade union membership information to pay trade union premiums, register that status of a protected employee and to comply with employment law obligations.	<ul style="list-style-type: none"> • <u>Consent</u> <p>Specific condition: You give your explicit consent.</p>

<p>We use information about your criminal convictions, reprimands and cautions to assess your suitability to carry out the work for which you are being engaged.</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> <p>Specific condition: To enable the University to carry out its legal obligations including to meet our obligations in the field of employment law and fulfil our duty of care to staff and students, safeguard children and vulnerable individuals and prevent unlawful acts from occurring.</p>
<p>We use information relating to emergency contact details and staff next of kin for the purposes of informing staff contacts in the event that member of staff takes ill or has an accident at work.</p>	<ul style="list-style-type: none"> • <u>Consent</u> • <u>Vital Interest</u> <p>Specific condition: You give your explicit consent or where this is not possible it is in your vital interests.</p> <p><i>The University assumes that you have checked with individuals that you may share their contact details.</i></p>
<p>Information on relationships per the University's <u>Close Personal Relationships Policy</u> for the purpose of keeping records and addressing any conflicts of interest.</p>	<ul style="list-style-type: none"> • <u>Legal Obligation</u> <p>Specific condition: To enable the University to carry out its legal obligations.</p>
<p>Information on your partner/spouse/dependents (international staff) to support the administration of your visa loan/reimbursement application.</p>	<ul style="list-style-type: none"> • <u>Contract</u> <p>Specific condition: You give your explicit consent.</p>
<p>To keep records of information and correspondence about flexible working applications</p>	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> <p>Specific condition: To allow you to make a statutory request</p>
<p>To keep records of information and correspondence about maternity leave, adoption/surrogacy leave, paternity leave, parental leave, shared parental leave, time off for dependants and to provide staff with statutory leave and/or pay you are entitled to under the relevant policy.</p>	<ul style="list-style-type: none"> • <u>Contract</u> <p>Specific condition: To allow you to make use of a statutory entitlement</p>

Information about pregnancy, including risk assessments for the purposes of the University taking the necessary actions to ensure the health and safety of you and your unborn child.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legal Obligation</u> <p>Specific condition: For the purposes of assessing the working capacity of pregnant/returning member of staff and to prevent injury or illness.</p>
Information of Sick Leave and Pay, including Wrexham University and Statutory Sick Pay for the purposes of keeping accurate records and to provide you with the University and Statutory Sick Pay you are entitled.	<ul style="list-style-type: none"> • <u>Contract</u> <p>Specific Condition: To enable the University to carry out its obligations relating to Statutory Sick Pay.</p>
Information in connection to legal and/or insurance claims.	<ul style="list-style-type: none"> • <u>Contract</u> • <u>Legitimate Interest</u> <p>Specific Condition: For the purposes of the University bringing or defending legal claims and/or insurance purposes.</p>
Information relating to health or medical conditions for the purposes of obtaining Occupational Health advice for the purposes of the University complying with its obligations under the Equality Act 2010 and Health and Safety legislation.	<ul style="list-style-type: none"> • <u>Consent</u> <p>Specific Condition: You give your explicit consent.</p>

What information do we get from third parties?

Sometimes we receive your data from third parties. The following table lists what information we may receive from them.

WHO WE GET DATA FROM	
Source	Data we may receive from them
Vacancy Manager (Stonefish)	Your application and recruitment record.
Home Office (UKVI)	Your immigration status.
Occupational Health Service, GPs and/or Medical/Healthcare Practitioners	Medical, accessibility related and similar information (we only obtain this information from third parties if you give us consent to do so).

Relevant professional body (for example GMC or NMC)	Your professional registration status.
University DBS Provider (Atlantic Data)	Your criminal record and barred list status.
External Training Providers	Training and development information.
External Assessment Providers	Psychometric testing and assessment outcomes.
Other Employment Agencies	Personal and contact details, your application and CV.
Former Employers	Your previous employment record.

Who do we share it with?

Sometimes we may need to share your data, including sensitive personal data. The following table gives examples of this kind of data sharing.

WHO WE SHARE DATA WITH	
Recipient	Data we might share with them
Line Managers	Contact details, employment details, attendance, planned workload, performance, conduct, training and development information for the performance of the employment contract and health information to fulfil our duty of care and where necessary for the implementation of reasonable adjustments and/or the provision of additional health information.
Our Administrative and Support Staff	Contact details, employment details, planned workload, immigration details, attendance, training, and development and progression information. Health information only where necessary for the implementation of reasonable adjustment and/or the provision of other support.
Trade Unions	Information relating to an employment relations matter.

Investigation officers, hearing panel chairs and members, University legal services team and/or external solicitors, employment tribunals and ACAS	Personal information relating to your conduct, performance and employment.
Research Funders	Staff details, including expertise and salary information for the purposes of auditing staff capabilities in order to secure funding.
Third-party organisations who process personal data on our behalf, such as training providers, assessment providers and employment surveyors.	Name, contact details, employment details.
Third-party organisations to whom a potential TUPE transfer is being made	Employment contract terms and conditions and associated benefits (full employee liability information).
Official bodies to which the University is obligated to report, for example, HESA and the Higher Education Funding Council Wales, or their agent.	Information supplied as necessary to fulfil the University's reporting obligations to these bodies. This may include relevant special category data.
Future employers	Personal information relating to conduct, performance and employment, where we are asked for a reference.
Professional development course tutors and/or providers	Course attendance lists and contact details.
Government agencies such as UK Visa and Immigration Office and the Home Office	Contact details, passport details, salary and other employment basis details for example fixed term or permanent contract status.
University DBS Provider (Atlantic Data)	Name and contact details.
University pension schemes (such as LGPS and TPS)	Personal information including contact details and salary and pension contribution details.
HMRC	Contact, pay and benefit details.
Professional regulatory bodies where you are professionally registered	Contact details, attendance and performance and conduct information.
IS Department	All personal data held electronically (for back-ups and for the development of new systems).

Internal Audit Service	Any personal data necessary for continued operation of internal controls and/or for the prevention, detection and investigation of suspected fraud or irregularities.
The police or other law enforcement agencies (this will only be shared on request and where there is a legal basis for doing so)	Information will be supplied as necessary in order to fulfil the University's legal obligations with respect to the prevention and detection of crime.
Software hosts and cloud providers	Information will be shared with IT suppliers and providers in order to provide our services. This data may be subject to transfer outside of the UK, however, we ensure that there are contracts in place and carry out due diligence to ensure the safety of personal information.
NHS Test and Trace	We may share your contact details and information on your movements around University campuses in order for them to identify individuals who have been in contact with you or may have been in contact with you. This is done in order for them to contact individuals where self-isolation may be required.
University external lawyers and insurers	Information relevant to the bringing or defence of legal claims and/or accidents or incidents occurring at the University.

When do we transfer data overseas (outside of the United Kingdom)?

As shown in the table above, we will share your data with your placement provider, who may be outside of the UK, on the grounds that such transfer is necessary for performing our contract with you.

Wrexham University also works with suppliers and partners who may make use of Cloud and/or hosted technologies. We undertake data security due diligence on our partners, ensure that suitable contracts are in place and that these partners conform to appropriate accreditations.

Wherever these transfers take place, the University will have an appropriate contract in place and there are strict rules regarding the confidentiality and security of your information in place to safeguard it.

How long do we keep your data?

Usually application-related personal data will be kept for around one year.

Contractual information (for example details of your attendance, performance and contact details) is retained for six years after you have completed or otherwise terminated your programme. Retention periods are usually linked to legal limitation (statute of limitation) periods. [The University's records retention schedule is available online.](#)

Personal data held in connection with our alumni office will be retained in support of your lifelong relationship with the University, or until there is no longer a legal basis for holding it (for example if you withdraw your consent).

Your data protection rights

Under data protection law, you have rights including:

Your right of access - You have the right to ask us for copies of your personal information.

Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.

Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.

Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.

Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.

Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at Data Protection Office, Wrexham University, Plas Coch, Mold Road, Wrexham, LL11 2AW or dpo@wrexham.ac.uk if you wish to make a request.

How to complain

If you have any concerns about our use of your personal information, you can make a complaint to us at Data Protection Officer, Wrexham University, Plas Coch, Mold Road, Wrexham, LL11 2AW or dpo@glyndwr.ac.uk.

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:
Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

Helpline number: 0303 123 1113
ICO website: <https://www.ico.org.uk>

Where can I get more information?

If you have any questions about this policy, please contact dpo@glyndwr.ac.uk.

We will keep this privacy notice under regular review and we will place any updates on this web page.

This privacy notice was last updated on 17/03/2026.