

## Layered Privacy Notice

### Activity/Processing undertaken: Colleague Engagement Survey

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

#### Who is collecting the information?

Our Partner, People Insight, is collecting the individual survey data responses directly from colleagues and will be a Data Processor for this information.

#### Who are we sharing your Personal Data with (externally)?

Survey responses are completed on a survey platform hosted in the UK by People Insight. Consequently, any personal data included in survey responses will be shared directly, by colleagues, with People Insight.

People Insight conducts the analysis on behalf of the University and receive all individual colleague responses alongside the disclosed demographic information.

The University does not have access to the data submitted by colleagues in survey responses. People Insights will provide the University with high-level analyses of responses and comments and will take steps to ensure that this information is anonymous.

The University uploads data from the University’s HR system, HR Connect, directly into the People Insights tool, which allows for the survey to be issued and for People Insights to conduct analysis across some core demographic information such as School/Service, Grade, Employee Group. Any results for groups less than 10 are not provided.

The following information about colleagues is uploaded:

- First name
- Surname
- Email address
- Colleague ID
- Grade
- School/Department
- Subject group/team
- Contract type (permanent, fixed-term)
- Employee Group

- Contract Basis (full-time, part-time, etc)
- Length of service (grouped into categories)

### **Why are we collecting it/what we are doing with it (purposes)?**

To evaluate colleague engagement at the University, the need to process this data stems, ultimately, from our responsibility and desire to create an inclusive and supportive workplace for colleagues, and to accomplish this we must engage with colleagues as an employer (e.g. to understand their thoughts, concerns and expectations).

Participation by colleagues in surveys is optional. The University will monitor colleague completion rates at a high level, but we will not monitor (or be able to monitor) completion at the level of individual, identifiable, colleagues.

### **What is the legal basis for processing?**

The University's legal basis for processing of personal data relating to the Colleague Survey is Article 6(1)(b) of the UK GDPR: "*processing is necessary for the performance of a contract to which the data subject is party*", in this case an employment contract.

For any special category (sensitive) personal data the legal bases are: Article 9(2)(b) "*processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment*" and Article 9(2)(g) of the UK GDPR: "*substantial public interest, on the basis of domestic law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and freedoms of the data subject*". The latter specifically relies on the "Equal opportunity or treatment" provisions in paragraph 8, in Part 2 of Schedule 1 of the DPA 2018 (required by section 10(3) of the DPA 2018).

### **How are we collecting this information?**

As noted above, People Insight is collecting the survey information. The University does not have access to the raw data in survey responses.

### **What information are we collecting (whose information and what type of personal data)?**

Depending on the questions in surveys, which are designed by the University in conjunction with People Insights, People Insights may collect and process information containing the following categories of personal data (including in text responses to open questions):

- Sexual Life/Orientation
- Religious or philosophical beliefs
- Racial or Ethnic Origin
- Health or Medical History
- Political opinions

The University believes that processing this information is necessary, should colleagues disclose it, to understand the thoughts, concerns and expectations of

colleagues, and to gain insights into how we can improve the workplace and culture at the University in line with our values.

Please refrain from providing data from which you or others can be identified in free text fields.

**Who can see your information within the University?**

All data in analysis will be anonymised by People Insight, and will be shared within the People Team, University Leadership Team, other Management and local survey leads as necessary and appropriate.

**How long is your information kept?**

People Insight will retain submitted personal data for up to 3 years after issue of final reports to the University.

**How secure is your information?**

The University has conducted security and privacy checks, as part of our procurement process. People Insight has also committed to maintain security and privacy safeguards, consistent with those required by the UK GDPR, in its contract with the University.

**Will your information be used for any automated decision making or profiling?**

No

**Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.**

No. People Insight may store your personal data on third party servers, but this data will be stored in the UK and is subject to the same security and privacy standards as those applicable to People Insight.

**Is any other information available?**

Further information about People Insight, including their privacy policy, is available [here](#).

This information is provided to supplement the University's main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data. You can access all the University's privacy notices [here](#).

You have various rights as a data subject, under data protection law, where your personal data is processed by organisations like the University and People Insight. Further information about these rights is available, with respect to the University, [here](#). People Insight also provides further information [here](#).