



Staff Fair Processing Notice

This notice explains the data processing practices of the Architectural Association School of Architecture (AA) in respect of staff or employee data; including administrative, academic and consultant personal data.

The AA is the data controller of your personal data as an employee and will only process your personal data in accordance with the UK Data Protection Act 2018 and the UK GDPR. We may amend this Notice from time to time and all staff, employees and contractors must comply with all AA policies and procedures in place from time to time related to data protection. This Notice does not form part of your contract of employment, however the Employee Handbook is a condition of your contract of employment and you must comply with the policies set out therein.

For information regarding how we process membership personal data please also refer to the fair processing notice specific to the [membership](#) available on the website.

If you have any requests concerning your personal information or any queries with regard to this policy please email the Data Protection Manager (Company Secretary): dataprotection@aschool.ac.uk.

DATA PROTECTION

In this fair processing notice the following words will have the meanings set out below:

"Data Controller"	means the AA - being the body which determines the purposes and means of the processing of personal data;
"Personal data"	means recorded information we hold about you from which you can be identified. It may include contact details, other personal information, photographs, and expressions of opinion about you or indications as to our intentions about you.
"Processing"	means doing anything with the data, such as storing, accessing, disclosing, destroying or using the data in any other way.
"Sensitive personal data"	means special categories of personal data processed by the AA including: <ul style="list-style-type: none">• data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership;• data concerning health; and• data concerning a natural person's sex life or sexual orientation.

HOW AND WHY WE PROCESS YOUR DATA

We will process data about staff for legal, personnel, administrative and management purposes and to enable us to administer your contract of employment and meet our legal obligations as an employer, for example to pay you, monitor your performance and to confer benefits in connection with your employment. In other cases, processing may be necessary for the protection of your vital interests, for our legitimate interests or the legitimate interests of others.



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Staff personal data is processed primarily for the following purposes:

- the administration of prospective, current and past employees including self-employed, contract personnel, temporary staff;
- the recruitment and selection process;
- administration of non-AA staff contracted to provide services on behalf of the AA;
- occupational health service;
- pensions administration;
- disciplinary matters, staff disputes, employment tribunals;
- staff training and development;
- assessing the AA's performance against equality objectives as set out by the Equality Act 2010; and
- any other purpose in the legitimate interest AA.

We will only process sensitive personal data where you have given your explicit consent, or where the processing is legally required for employment purposes including (but not limited to) the following:

- information about an employee's physical or mental health or condition in order to monitor sick leave and take decisions as to the employee's fitness for work;
- the employee's racial or ethnic origin or religious or similar information in order to monitor compliance with equal opportunities legislation;
- in order to comply with legal requirements and obligations to third parties.

Your personal data will only be processed to the extent that it is necessary for the specific purposes notified to you. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us using the details listed below.

DATA TRANSFERS – WHO IS YOUR DATA SHARED WITH

The AA shares data with third parties who can demonstrate they have the appropriate technical and organisational measures in place to keep the AA's data secure and comply with the requirements of GDPR. Your data will be shared internally with other departments in order to provide services (IT, Library, Membership).

The AA uses data processors for a number of business processing activities including in relation to your employment, for example, cloud-based service providers such as Microsoft Office 365 for email and file storage. and When engaging with data processors, the AA is obliged to ensure that there are appropriate contractual, technical and organisational measures in place to ensure data is kept secure and in line with data protection regulations. For a full list of the data processors in use by the AA from time to time, please contact us on dataprotection@aschool.ac.uk.

Personal data may be disclosed when legally required or where there is a legitimate interest, either for the AA or the data subject, for instance where a medical or occupational health assessment is required. Any such use of your data takes into account any prejudice or harm that may be caused to you as the data subject.



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The AA will make some statutory and routine disclosures of personal data to third parties where appropriate. The AA may share your personal data with third party providers offering employee benefits with your consent. Please note that these third parties may change from time to time, please contact us at dataprotection@aaschool.ac.uk for further information.

- Higher Education Statistics Agency (HESA) – ([HESA's privacy statement](#))
- Quality Assurance Agency for Higher Education (QAA) ([QAA's privacy statement](#))
- UK Visas and Immigration
- HM Revenue and Customs (HMRC)
- Pension schemes and associated services
- Research sponsors/funders
- Trade unions
- Counselling services
- Childcare voucher providers
- Potential employers (where a reference is requested)

HOW LONG WILL YOUR DATA BE HELD BY THE ARCHITECTURAL ASSOCIATION?

We will not keep your personal data for longer than is necessary for the purpose it was collected.

In general, employee data is required to be kept whilst you are employed by the AA and will archive it for 6yrs after your employment ceases in line with the limitation period for contractual claims set out in the Limitation Act 1980. Your HR file is likely to contain information relating to:

- Application, interview and references
- Contract of employment
- Sickness and medical information
- Annual Leave
- Maternity/Paternity/Parental leave
- Pay, tax and NI
- Redundancy records
- Pension & other benefits
- Disciplinary matters
- Other matters directly related to your employment

The AA is also obliged to observe certain statutory retention periods in respect of other records which may contain personal data. Details are set out in the HR data retention schedule which is available from HR upon request.

USE OF CCTV

For reasons of personal security and to protect premises and the property of members, close circuit television cameras are in operation in certain key locations. The presence of these cameras may not be obvious. Personal data obtained during monitoring will be processed in line with our CCTV Policy which can be found on the intranet.



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DATA SECURITY

We will ensure that appropriate measures are taken against unlawful or unauthorised processing of personal data, and against the accidental loss of, or damage to, personal data. We have in place procedures and technologies to maintain the security of all personal data from the point of collection to the point of destruction.

Maintaining data security means guaranteeing the confidentiality, integrity and availability (for authorised purposes) of the personal data. Please refer to the AA's [Information Security and Data Protection Policy](#) for further details.

YOUR RIGHTS AND RESPONSIBILITIES

You have certain rights in relation to your personal data held by the AA. These include:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling.

Further information about the rights described above can be found [here](#).

You also have the right to complain to the UK Information Commissioner's Office (ICO). If you consider that data protection principles have not been followed in respect of personal data about yourself or others you should first raise the matter with your line manager.

We will keep the personal data we store about you accurate and up to date. Please notify us if your personal details change or if you become aware of any inaccuracies in the personal data we hold about you. Please contact the Human Resources office as soon as possible.

We will publish on our website any changes we make to this fair processing notice and notify you by other communication channels where appropriate.

Access your data

As stated above you have the right to access a copy of your personal data (commonly referred to as a 'subject access request'). If you wish to obtain a copy of your personal data, please submit your request to dataprotection@aschool.ac.uk