

VISITING LECTURER PRIVACY NOTICE

Norwich University of the Arts is a registered data controller. We collect, hold and process personal information relating to your services. It is essential to do so in order for us to carry out our legal responsibilities, functions manage our operations. We hold personal information and comply with the requirements of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA).

You may also want to read other Norwich University of the Arts privacy notices. If you use our website, please read the website privacy notice. We do our utmost to protect your privacy. As such we have security systems and procedures to protect information from unauthorised disclosure, misuse, or destruction.

As part of the process for engaging Visiting Lecturers to Norwich University of the Arts, we collect and process data to enable the University to make payment of your fee and to monitor the diversity and inclusion of Visiting Lecturers. The University is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.

What information does the University collect

The University collects a range of information about you. This includes:

- your name, address and contact details, including email address and telephone number;
- whether or not you have a disability for which you require reasonable temporary support for delivery of your session
- equal opportunities monitoring information, including information about your age, gender, gender identity, marital status, ethnic origin, sexual orientation, disability and religion or belief.

The University collects this information in the Visiting Lecturer Personal Record form and the Equality & Diversity Monitoring form for Visiting Lecturers.

Equality and Diversity data will be stored in a HR data process system. The Visiting Lecturer Personal Record data will be stored in the Finance payment system.

The University will not use your data for anything other than for the purposes of your Visiting Lecturer session.

How and Why we collect this information

The University complies with the provisions of the Data Protection Act 2018 which sits alongside the UK General Data Protection Regulation (GDPR). Article 6 of the UK GDPR defines six different lawful grounds for an organisation to be permitted to process personal data, and the University is legally obliged to determine and advise you of under which of the legal bases the different categories of your personal data is processed. The grounds we use to process your personal data are as follows:

The first legal basis we would rely on is Article 6(1)(e), 'for the performance of a public task in the public interest'. This applies to where we use your personal data to meet our obligations or duties, or to exercise our powers, as a public authority, or to support the functions of other authorities that have a public task defined within law.

The University would rely on Article 6(1)(f), 'legitimate interests' as its legal basis where we judge the use of the personal data to be within our legitimate interests (or the legitimate interests of another party) and where we do not deem this be privacy-intrusive or a risk to your own rights and freedoms. This is where the use of data poses no risks to individuals and is for the purposes of improving our services or investigating technical issues.

We rely on Article 6(1)(a), 'consent' as our legal basis when you have given us your freely given, informed, specific consent. It is important to note that you have the right to withdraw that consent at any time.

Where we hold details of your nationality, this will be classed as 'sensitive personal data' also known as 'special category personal data.' Access to and the sharing of this kind of 'special category' personal information is strictly controlled. The University's legal basis for processing this sensitive data under Article 6 of the UK GDPR is Article 6(1)(a), 'consent.' In addition, for sensitive data, the University is required to identify an appropriate lawful condition under Article 9 of the UK GDPR which in this case is Article 9(2)(a) 'explicit consent'. As above, it is important to note that you have the right to withdraw that consent at any time.

We will only process your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another related reason and that reason is compatible with the original purpose. If we need to use your data for an unrelated purpose, we will seek your consent to use it for that new purpose.

Automated Decision Making and Profiling

As part of our commitment to protecting your personal data, we want to inform you that the University currently limits the use of automated decision-making and profiling in line with the requirements of the UK GDPR. However, as we continue to develop our services, there may be instances in the future where automated processes are used to make decisions or create profiles. Should this occur, we will ensure that appropriate safeguards are in place and will always ensure that human intervention is involved when decisions are made that impact you.

Who has access to data

Where appropriate and permitted, we may share data on a confidential basis with other University departments. We may disclose certain personal information to external organisations to carry out our legal responsibilities, functions and manage our operations or because you asked us to.

International Transfers

International Data Transfers

We may transfer your personal data to countries outside the UK (third countries), including countries within the European Economic Area (EEA) and beyond, where our third-party service providers or affiliated organizations are based. Such transfers may involve countries that do not have data protection laws equivalent to those in the UK.

When transferring personal data to a third country, we take steps to ensure that your data is protected in line with the UK General Data Protection Regulation (UK GDPR). These measures include the use of the following safeguards, where appropriate:

- 1. Standard Contractual Clauses (SCCs): For transfers to third countries that do not provide an adequate level of data protection, we implement the European Commission's Standard Contractual Clauses (SCCs) or equivalent contractual mechanisms as approved by the UK Information Commissioner's Office (ICO). These clauses legally bind the recipient of the personal data to ensure that your data is processed in accordance with the standards set out by the UK GDPR.
- 2. **Adequacy Decisions**: Where applicable, we may transfer your personal data to a third country that has been recognised by the UK government as providing an adequate level of data protection. In such cases, no further safeguards are required, and the transfer will be made in compliance with the UK's adequacy regulations.
- 3. **Additional Safeguards**: In some cases, additional measures may be taken, such as encryption, pseudonymisation, or other technical and organisational safeguards, to further protect your personal data during the transfer process.
- 4. Transfers to Internal Organizations: Your personal data may also be transferred to other entities within our university group or related organizations, including those based outside the UK, to support internal administrative functions, academic services, or research purposes. Any such transfers will be governed by appropriate safeguards, including but not limited to SCCs or other legally recognised measures under the UK GDPR.

We will ensure that any data transfer to third countries is carried out with appropriate legal protections in place, and we will provide you with further information upon request regarding the specific safeguards applied in relation to your data.

How does the University protect data?

The University takes the security of your data seriously. It has internal policies and controls in place to ensure that your data is not lost, accidentally destroyed, misused or disclosed, and is not accessed except by our employees in the proper performance of their duties.

For how long does the University keep data?

The University will hold your equality and diversity data on electronic file for 6 months after the end of the relevant Visiting Lecturer session(s).

Your rights

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

- access and obtain a copy of your data on request;
- require the University to change incorrect or incomplete data;
- require the University 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 University is relying on its legitimate interests as the legal ground for processing; and

 ask the University to stop processing data for a period if data is inaccurate or there is a dispute about whether or not your interests override the University's legitimate grounds for processing data.

If you would like to exercise any of these rights, please contact the University's Data Protection Officer, email dataprotection@norwichuni.ac.uk.

If you believe that the University has not complied with your data protection rights, you can complain to the Information Commissioner. The <u>Information Commissioners website</u> provides more information on data breach rights.

What if you do not provide personal data?

Information on the Visiting Lecturer Personnel Record form is required in order to process the payment of your fee.

You are under no obligation to provide the Equality and Diversity data to the University.

How to contact us

If you require further information or have any concerns about how your personal information is held and processed by us, please email the University's Data Protection Officer at dataprotection@norwichuni.ac.uk or write to us at Data Protection Officer, Norwich University of the Arts, Francis House, 3 -7 Redwell St, Norwich NR2 4SN.

You can also complain to the ICO if you are unhappy with how we have used your data. Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF

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

Changes to the Visiting Lecturer privacy notice

The University will keep the privacy notice under regular review.

This privacy notice was last updated on April 2025