

Layered Privacy Notice

Activity/Processing undertaken: Colleague Leaver 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 individual colleague responses alongside the disclosed demographic information.

The University will have access to the data submitted by colleagues in survey responses. People Insight will provide the University with high-level analyses of responses and comments.

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 to conduct analysis across some core demographic information such as School/Service and Length of Service.

The following information about colleagues is uploaded:

- First name
- Surname
- Email address
- Colleague ID
- School/Service
- Colleague group
- Date and month leaving
- 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.

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.

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

As part of our leavers survey, designed by the University in collaboration with People Insight, we may ask colleagues to voluntarily provide demographic information. These questions are **optional**, and colleagues are free to skip any that they do not wish to answer.

The types of personal data we may collect—depending on the survey design and colleague responses—can include:

- Gender identity
- Sexual orientation
- Religious or philosophical beliefs
- Racial or ethnic origin
- Disability status
- Political opinions
- Any other demographic details you choose to share (including in open text responses)

We collect this information to better understand the experiences, perspectives, and needs of our colleagues. This helps us identify patterns in engagement across different groups, ensuring we are not discriminating and allowing us to take meaningful action to improve our workplace culture in line with our values. This data supports our efforts to understand the diversity of our workforce and to create a more inclusive and equitable environment for everyone.

Who can see your information within the University?

All data in analysis will be anonymised within the People Team before high level reports are shared with University Senior Leadership Team and local managers, or survey leads as 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 using the following URL: <https://peopleinsight.co.uk/privacy-policy/>

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 using the following URL: <https://www.napier.ac.uk/privacy-policy>

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 using the following URL: <https://www.napier.ac.uk/privacy-policy>. People Insight also provides further information which you can access using the link given above.