

# Privacy Notice

**Oxford Brookes University (OBU)** as the Data Controller is committed to protecting and respecting your privacy. This Privacy Notice explains how we will process: collect, use, and share your personal data (*Data*), and your rights in relation to the data that we hold.

**1. Data We Collect** - to meet our legal compliance reporting obligation under The Social Security (Claims and payments) Regulations 1979, HASAWA (1974) and the management of health and safety regulations (1999) and the regulations that fall within the Act principally RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013).

We may collect and process the following data about you for a form on SNoW or Google:

- Your identity, address and contact details.
- The nature of the accident/incident or what they witnessed.
- The nature of the additional need or support needed.
- The nature of the health status in relation to a particular workplace hazard.

**2. How We Use Your Data** - We will use your data to:

- To maintain the safety of employees, students, contractors and visitors by ensuring we capture information about accidents and incidents, to investigate these and to put in place control measures which will eliminate, reduce or mitigate the future risk.
- To maintain the safety of employees, students, contractors and visitors by ensuring suitable and sufficient risk assessments are carried out.

**3. Legal Basis for Processing** - We process your personal data based on:

- Consent under Art., 6(1)(a) of the UK GDPR 2018.
- Legal obligation under Art., 6(1)(c) of the UK GDPR 2018.
- Vital interest under Art., 6(1)(d) of the UK GDPR 2018.

And special category under

- Art., 9(2)(a), UK GDPR 2018.

- Art., 9(2)(c), UK GDPR 2018.
- Art., 9(2)(g), UK GDPR 2018.

#### **4. Sharing Your Data** - We may share your data with:

Data will be shared with the Health & Safety team and where necessary with the University's Occupational Health provider via a line manager/People manager referral.

Data will be shared with the Investigating Officer assigned to investigate an accident or incident who will be from the relevant department/faculty depending on the nature of the accident/incident.

Accident reporting data will be held in ServiceNow. ServiceNow is a cloud-based case management solution. Please refer to the ServiceNow Privacy Statement [here](#).

Occupational health information collated by the Universities nominated Occupational health provider UKIM will be handled in line with their Data privacy statement [here](#).

Data will be shared with assessors who complete display screen equipment assessments and PEEPs (Personal emergency evacuation plans).

Data may also be shared with individuals from the legal professions, agents from enforcing agencies, line managers, and *recognised* Trade Unions (permission will be obtained from the injured person to share their data with the trade union). This will happen if legal action or enforcement action is instigated, and to prevent the recurrence of the incident.

Exceptionally information could be shared with the emergency services in the event of an emergency.

Anonymised or de-identified data will also be shared with Faculties and Directorates by the Health & Safety team via reports.

There will be no automated decision making using your data.

#### **5. Will my data be transferred outside of the EEA?**

No.

## 6. Are there any consequences of not providing the requested data?

Yes, it is a legal duty placed on the organisation and the party is expected to provide reasonable cooperation so that the event can be recorded. Data Privacy of the data subject is important and concerns on what is being shared can be considered although it is a legal responsibility for the organisation to process such information to satisfy their compliance obligations.

## 7. Will there be any automated decision making using my data?

No.

**8. Data Security and Storage** - We are committed to ensuring the security of your personal data. Here at the OBU we implement a variety of security measures to maintain the safety of your personal information. These measures include:

- **Encryption:** We use encryption to protect sensitive data during transmission and storage.
- **Access Controls:** Access to personal data is restricted to authorised personnel only, based on their role and responsibilities.
- **Regular Audits:** We conduct regular audits and assessments of our data protection practices to ensure compliance with relevant laws and regulations.
- **Secure Storage:** Personal data is stored in secure facilities with appropriate physical and technical safeguards.
- **Incident Response:** We have procedures in place to respond to data breaches or security incidents promptly and effectively.

## 9. Data Retention

All data will be stored in accordance with the Oxford Brookes retention schedule.

## 10. What rights do I have regarding my personal data?

- You have the right to be informed.
- You have the right of access to your data.
- You have the right to correct data if it is wrong.
- You have the right to ask for your data to be deleted.
- You have the right to restrict use of the data we hold.
- You have the right to data portability.
- the right to object to OBU using your data.
- You have rights in relation to using your data automated decision making and profiling.

**If you have questions or concerns about our use of your personal information? Please contact Oxford Brookes at [info.sec@brookes.ac.uk](mailto:info.sec@brookes.ac.uk) to ask for guidance or make a complaint.**

You can independently contact the independent Oxford Brookes Data Protection Officer at [BrookesDPO@brookes.ac.uk](mailto:BrookesDPO@brookes.ac.uk).

If you are unhappy with how we have processed your personal data, you can also complain directly to the ICO as shown below.

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>