



Publication of staff and PGR student profiles on the University website

Policy

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Table of Contents

Introduction	3
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Appendix: Lawful basis for publication of staff and PGR student profiles by University area of work	6
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Introduction

1. The University publishes information (“profiles”) on its website about its academic staff, senior professional services staff, student-, staff- or outward-facing professional services staff and postgraduate research (PGR) students. This policy does not refer to the publication of staff contact details in the University Phonebook or via Outlook, which is dealt with separately and using contract as the lawful basis.
2. This policy sets out the rationale and legal basis under UK data protection law and UK GDPR for the publication of staff profiles, describes how individuals are informed about such publication, and sets out the rights of individuals in respect of their profile, including the process for objecting to publication.
3. The policy is supported by a separate Legitimate Interests Assessment which explains in greater detail the rationale for publishing and the legal basis for so doing. It also assesses the impact of publication on the rights of individuals.
4. The University is an academic institution, with a mission of delivering excellence in education and research, for the benefit of individuals and communities. It is an outward-facing organisation with many external stakeholders, and it builds and develops relationships across many sectors. The University is an educational institution, with students who become members of the University for varying periods of time and who need to be able to interact with the University in a way that enables them to secure the maximum benefit from their period of study at the University. Both students and staff need to be able to identify individuals working within the University in various fields order to fulfil the requirements of their studies or jobs, respectively. For each of these reasons, the University believes that publishing profiles of its staff and PGR students makes a direct contribution to the achievement of its mission.
5. The University, as the data controller, has carried out a Legitimate Interests Assessment for publication and considers that there are legitimate interests for publishing profiles of: all academic staff; senior professional services staff in grades 7-11; professional services staff who have roles that are outward-, staff- or student-facing as defined in their job descriptions; and postgraduate research students. For the avoidance of doubt, staff whose profiles fall under this policy are those who are employees of the University or UECS. The policy does not cover on-demand workers. In addition, details of PGR students are published on the profiles of their supervisors. Profiles are automatically published for these groups. The appendix describes these groups in more detail. The personal, institutional contact details for personal assistants to senior staff may also appear on the profiles of their managers. The Legitimate Interests Assessment has identified the necessity of such publication and should be consulted for further detail. These legitimate interests will apply except where they are overridden by the interests or fundamental rights and freedoms of the data subject.

6. Other staff, where the legitimate interests of the University to publish their staff profiles are not as strong, still have an opportunity to have their profiles published, if they would like this to happen.
7. The University respects the rights of individuals with regard to their privacy and does not publish profiles except where there is a clear legitimate interest or, in cases where the legitimate interest is less, where the individual has asked for this to happen.
8. The right to be informed is important, and information about publication is provided in this policy, in the Legitimate Interests Assessment, in staff and student privacy notices, and on web pages about editing profiles.
9. Line managers are responsible for ensuring that job descriptions are up to date and fully reflect the needs of the University, in particular in respect of identifying those roles where it is important that the role holder's duties provide a legitimate interest to the University in publishing their profiles. Changes to job descriptions that lead to a new requirement for publication of a profile, or disputes about the content in respect of the need to network externally, will be dealt with through standard People & Culture procedures.
10. As the data controller, the University is responsible for the accuracy of the information published on its website. As employees or students of the University, individuals are responsible for providing up-to-date information about themselves to the University, thereby ensuring that their published profile is accurate and up to date. Profiles, excluding contact details, can be edited online. Where information is not editable by the individual, the relevant team should be contacted for amendments to be made. Information to support this is published on the web page about editing profiles. Individuals are also responsible for ensuring that they have engaged with the mandatory information security training provided by the University, and for familiarising themselves with the advice provided by the University on good data management and on protecting themselves from phishing attacks¹.
11. Where an individual does not wish to have their profile published, they should make a request to their line manager that their profile is removed. Agreement to remove the profile will be at the line manager's discretion. Consideration of such requests should take into account the legal basis for publication, any changes in the requirements of the role and the job description, balanced with consideration for the interests or fundamental rights and freedoms (covering, for example, considerations of privacy, wellbeing and physical security) of the individual(s) concerned. Requests should be assessed within ten working days. Profiles will normally continue to be published until a final decision has been made.
12. Where the line manager considers that publication of the profile continues to be in the University's legitimate interests and does not have an undue negative effect on the rights or

¹ For example, <https://www.essex.ac.uk/staff/it-services/mfa> and <https://www.essex.ac.uk/staff/it-services/phishing>

wellbeing of the individual, the individual will have a right of appeal. Appeals will be heard by the Director of People & Culture, or their nominee. Appeals should be made in writing. The right of appeal does not displace individuals' data protection rights in law. The individual will also have a right of appeal externally to the Office of the Information Commissioner and contact details for such an appeal will be provided when the individual is informed of the outcome of their internal appeal.

Appendix: Lawful basis for publication of staff and PGR student profiles by University area of work

Academic Section

All staff: Legitimate interests

Communications and External Relations

All staff: Legitimate interests

Estates and Campus Services

All Grades 7 – 11: Legitimate interests

All staff in all grades in Customer Services: Legitimate interests

All staff in all grades in Accommodation: Legitimate interests

All staff in all grades in Post room: Legitimate interests

All staff in all grades in Day Nursery: Legitimate interests

All staff in all grades in Essex Food: Legitimate interests

All staff in all grades in Event Essex: Legitimate interests

All staff in all grades in Security and Parking: Legitimate interests

All staff in all grades in Sport: Legitimate interests

All staff in all grades in Wivenhoe House Hotel: Legitimate interests

All staff in all grades in Commercial Properties and Knowledge Gateway: Legitimate interests

Staff in grades 1 – 6 (or the equivalent UECS grades) in: Business Support Services: Legitimate interests with an explicit opt in

Staff in grades 1 – 6 (or the equivalent UECS grades) in Soft FM: Legitimate interests with an explicit opt in

Staff in grades 1 – 6 (or the equivalent UECS grades) in Central Stores: Legitimate interests with an explicit opt in

Staff in grades 1 – 6 (or the equivalent UECS grades) in Maintenance and Capital Development: Legitimate interests with an explicit opt in

Staff in grades 1 – 6 (or the equivalent UECS grades) in Sustainability and Grounds: Legitimate interests with an explicit opt in

Finance, Planning and Data Insight

All staff: Legitimate interests

Innovation and Technology Solutions

All Grades 7 – 11: Legitimate interests

All staff in all grades in the Director's office: Legitimate interests

All staff in all grades in IT Service Delivery and Business Services: Legitimate interests

All staff in all grades in Strategic Project Delivery: Legitimate interests

All staff in all grades in IT Customer Experience: Legitimate interests

Staff in grades 1 – 6 in Infrastructure Services: Legitimate interests with an explicit opt in

Staff in grades 1 – 6 in Software Development Services: Legitimate interests with an explicit opt in

Library and Cultural Services

All staff: Legitimate interests

The Office of the Vice- Chancellor

All staff: Legitimate interests

People & Culture

All staff: Legitimate interests

The Research and Enterprise Office

All staff: Legitimate interests

Faculty, departmental and school professional services staff

All staff: Legitimate interests

Academic staff and PGR students

All staff: Legitimate interests

Document Control Panel

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