

Privacy Notice - Staff

The Royal Central School of Speech and Drama is committed to protecting and respecting your privacy.

This policy explains when and why we collect personal information about our staff, how we use it, the conditions under which we may disclose it to others, and how we keep it secure.

If you have any questions regarding this policy, please email the Head of Human Resources [[hr@cssd.ac.uk](mailto:hr@cssd.ac.uk)] or by post to The Royal Central School of Speech and Drama, 62-64 Eton Avenue, London NW3 3HY.

You can also contact the School’s Data Protection Officer, for example if you have any general questions about Central’s privacy practices, by email, or by writing to them at The Royal Central School of Speech and Drama, 62- 64 Eton Avenue, London NW3 3HY.

Who we are

The Royal Central School of Speech and Drama (or Central) is a small and specialist higher education institution that stands at the forefront of training and research in the theatre and performance arts. On our website, you can find out more about the School, including its range of undergraduate and postgraduate programmes. Company and exempt charity information about Central can also be found there.

How we collect information from you

We obtain information about you when you:

* Apply for a vacant or new job at Central (e.g. application form and records of the recruitment process)
* Complete documentation in relation to becoming a member of staff, including, but not exclusively, details provided by your referees, personal and bank details
* Communicate with us about other HR related procedures whilst being an employee, visiting lecturer, hourly paid worker or student helper (e.g. regarding sickness absence, training,)

We do not use any automated processes to make decisions about individuals.

What personal data we hold

The personal information we collect will include:

* Basic biographic information (e.g. name, contact details, next of kin)
* Education, training and employment information (e.g. qualifications awarded, places of employment)
* Sensitive personal information (e.g. bank details, health and medical conditions like disabilities, criminal conviction information, ethnic origin, religion or belief, sexual orientation and gender identifier)

How we use your data and how long we keep it for

When you commence employment with us, the School will collect some data about you. We are required to obtain and process certain personal information so that, for example, recruitment processes, payment of staff, and legal obligations to government complied with, including the following:

* To manage the recruitment process and successful candidates’ transition from applicant to employee
* To carry out pre-employment/engagement checks including right to work, occupational health, references and disclosure & barring service
* To manage all HR contractual processes, including probation, absence management, pension administration
* To administer payment processes including payroll, pension and staff benefits
* To support training and professional development
* To ensure the health, safety and wellbeing of employees, employee, visiting lecturer, hourly paid worker or student helpers, job applicants and accommodate special requirements where necessary (i.e. in respect of declared disability, religion)
* To meet our legal obligations to compile statistics and provide data to central government agencies and regulatory bodies
* To process equal opportunities data (e.g. legal sex, gender identity, relationship status, religion or belief, sexual orientation, nationality, ethnicity, disability) for Higher Education Statistical Agency (HESA) purposes. For more details about HESA, please visit their website, https://[www.hesa.ac.uk.](http://www.hesa.ac.uk/)
* To ensure that you have access to Central’s facilities
* To allow us to contact a chosen next of kin in the event of an emergency
* To manage the termination of employment by resignation, redundancy, retirement or dismissal
* For internal and external audit purposes
* To fulfil our obligations under other laws and legislative regimes as is required

We review our retention periods for personal information on an annual basis. We are legally required to hold some types of information to fulfil our statutory obligations. We will hold your personal information on our systems (electronic and paper-based) for the full duration of your employment and for six years after your employment has ended. Read our Data Protection and Records Retention Policy for more detailed information.

Who has access to your information

Your information is restricted to the HR team and will not normally be disclosed to a third party except in those cases where the School is legally or contractual obligation to share your personal data. There are a few exceptions to this; for example medical information would be released if failure to do so would cause you harm or death. Information might be released to assist the police in making an arrest or to safeguard national security. However, we will not release your data to a friend, parent or employer without your explicit consent to do so (other than to simply confirm that you are in attendance, in which case we would normally confirm this fact without seeking your permission first).

We may pass your information to our third party service providers for the purposes of completing tasks and providing services to you on our behalf (for example to process your pay, benefits and conduct surveys). However, when we use third party service providers, we disclose only the personal information that is necessary to deliver the service, and we have contracts in place with all third party service providers that requires them to keep your information secure and not to use it for their own direct marketing purposes. Please be reassured that we will not release your information to third parties unless you have requested us to do so, or we are required to do so by law, for example, by a court order or for the purposes of prevention of fraud or other crime. The School normally holds data sharing agreements with third party service providers who work on its behalf. We share your data with the following external parties:

* MHR for our monthly payroll process in order to pay your wages each month; https://[www.mhr.co.uk/.](http://www.mhr.co.uk/)
* Higher Education Statistical Agency (HESA) for statistical research purposes. Further information is available on their website https://[www.hesa.ac.uk/about/regulation/data-protection/notices.](http://www.hesa.ac.uk/about/regulation/data-protection/notices)
* The Office for Students https://[www.officeforstudents.org.uk](http://www.officeforstudents.org.uk/) and United Kingdom Research and Innovation https://[www.ukri.org](http://www.ukri.org/) for statistical, funding and government policy research purposes.
* Office for National Statistics (ONS) for statistical and government policy research purposes. For further details please visit their website; https://[www.ons.gov.uk/](http://www.ons.gov.uk/)
* Her Majesty’s Revenue & Customs (HMRC) for regulatory tax returns; https://[www.gov.uk/government/organisations/hm-revenue-customs](http://www.gov.uk/government/organisations/hm-revenue-customs)
* UK Visas & Immigration Service (UKVI) in order to comply with the Immigration and Nationality Act 2006 (e.g. ensuring we are able to provide evidence that all our employees and workers have the correct documents to support their right to work in the UK). More details can be found on the government website; https://[www.gov.uk/government/organisations/uk-visas-and-immigration](http://www.gov.uk/government/organisations/uk-visas-and-immigration)
* External pension’s provider, i.e. Teachers' Pension Scheme (TPS) https://[www.teacherspensions.co.uk/](http://www.teacherspensions.co.uk/) or the Local Government Pension Scheme (LGPS) https://[www.lgpsmember.org/,](http://www.lgpsmember.org/) either when you commence employment with Central, or when you meet the minimum criteria to be enrolled (hourly paid workers), unless you inform us that you do not wish to be in the scheme.
* Mercer Marsh Benefits, our group life assurance, which provides us with the employee assistance programme and our death in service scheme; <http://www.mercermarshbenefits.com/>
* XpertHR, which analyses anonymous data in liaison with UCEA for salary benchmarking purposes; https://[www.xperthr.co.uk/salary-surveys/](http://www.xperthr.co.uk/salary-surveys/) and <http://www.ucea.ac.uk/>
* Internal and external auditors when asked to do so. As a publicly-funded organisation, Central is subject to audit and is required on occasion to give the auditors’ access to details of Central’s employees, hourly paid workers, student workers, applicants for job vacancies, in order for them to report on the integrity of Central’s processes. The auditors will not retain personal data once an audit is complete.

The only other occasion where we might have to share data with an external party without your express consent would be where it is necessary in order to protect the vital interests of you or another person, for example in the case of an emergency, or in the case of legal proceedings.

We will not sell or rent your information to third/external parties.

We will not share your information with third parties for marketing purposes.

Your rights

The law on data protection gives you certain rights in relation to the data we hold on you. These are:

* the right to be informed. This means that we must tell you how we use your data, and this is the purpose of this privacy notice
* the right of access. You have the right to ask for a copy of the information the School holds about you, known as a Subject Access Request. You can find out how to request this data.
* the right for any inaccuracies to be corrected. If any data that we hold about you is incomplete or inaccurate, you are able to require us to correct it. As an employee, visiting lecturer, hourly paid worker or student helper, you can access and update certain personal details (e.g. bank account details, contact details and next of kin) via the JANE Self Service portal. Access is available via MyCentral. If you cannot gain access to the JANE Self Service portal, or wish to update personal data that you do not have access to, please contact [hr@cssd.ac.uk](mailto:hr@cssd.ac.uk) for advice and assistance.
* the right to have information deleted. If you would like us to stop processing your data, you have the right to ask us to delete it from our systems where you believe there is no reason for us to continue processing it
* the right to restrict the processing of the data. For example, if you believe the data we hold is incorrect, we will stop processing the data (whilst still holding it) until we have ensured that the data is correct
* the right to portability. You may transfer the data that we hold on you for your own purposes
* the right to object to the inclusion of any information. You have the right to object to the way we use your data where we are using it for our legitimate interests

How we keep your personal data safe

When you give us personal information, we take steps to ensure that it is treated securely. Any sensitive information (such as your bank details) is encrypted and protected with a secure file transfer portal (SFTP).

Non-sensitive details (your email address etc.) are transmitted normally over the Internet, and this can never be guaranteed to be 100% secure, although we aim to provide every page on our website as secure https. As a result, while we strive to protect your personal information, we cannot guarantee the security of any information you transmit to us, and you do so at your own risk. Once we receive your information, we make our best effort to ensure its security on our systems. Where we have given (or where you have chosen) a password which enables you to access certain parts of our websites (for example if you have access to edit your student or staff profile), you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

What is the lawful basis of using and storing your data?

We have identified that our using and storing your personal data is necessary for the purpose of either:

* Complying with a legal obligation (e.g. checking your right to work in the UK)
* Performing our contractual obligations with you or to take steps to enter into a contract (e.g. administering your employment contract; monitoring the recruitment process; making a payment to you)

Additionally, we may process data that is classed as a “*special category*” of personal data, this includes information about your legal sex, gender identity, relationship status, religion or belief, sexual orientation, nationality, ethnicity, disability. We have identified that our using and storing of special categories of personal data is necessary for the purpose of:

* Assessing the working capacity of our employees (e.g. occupational health checks and references)
* Carrying out obligations under employment, social security or social protection law (e.g. administering sickness records , occupational and statutory maternity pay records and other statutory frameworks)
* Performing statistical research to ensure we meet our public-sector equality duties (e.g. monitoring Equal Opportunities data)

When we require your explicit consent for processing your personal data for a specific purpose, then we will ask for your consent at the point of collecting that data from you. For example this may be when a prospective employer, landlord and other external organization request a reference or in respect of an application for retirement on the basis of ill-health or incapacity. Any request for consent we will make clear and separate from other terms & conditions and you can withdraw your consent at any time.

Complaints or queries

We take any complaints we receive about the use and security of your personal information very seriously. If you think that our collection or use of your information is unfair, misleading or inappropriate please contact the School’s Data Protection Officer by email or write to them at The Royal Central School of Speech and Drama, 62- 64 Eton Avenue, London NW3 3HY.

We would also welcome your suggestions for improving our procedures.

Changes to this policy

We keep this policy under regular review. This policy was last updated on 21 May 2018.