

## Confidentiality, Data Protection & Privacy Statement

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King's Careers & Employability complies with the terms of the EU General Data Protection Regulation (GDPR) as entrenched in UK law through the [Data Protection Act 2018](#); and also the [Freedom of Information Act 2000](#).

We also abide by the AGCAS Code of Practice, ensuring that our services and provision is guided by the principles of equality of opportunity, accessibility, impartiality, transparency and confidentiality.

*This statement should be read in conjunction with the core [King's College London Privacy Notice](#) and associated [Student Data Collection Notice](#) or [Alumni and Supporters' Privacy Statement](#) which outlines the specific legal basis for our processing of your personal information in relation to our core activities as King's College London.*

*'Users' and 'applicants' in the context of this statement refers to all users of our services, which includes students, alumni, researchers, staff and other internal clients. To view full data held by King's Collect London you will need to submit a [request for personal information](#).*

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### Staff Confidentiality

All staff employed by King's Careers & Employability are required to sign a confidentiality agreement with their employer upon signing their contract. This includes:

- King's College London staff
- The Careers Group, University of London staff
- King's Talent Bank staff (student marketing assistants, student assistants, application advisers)
- Freelance Careers Consultants

Staff found in breach of this agreement will be referred to King's College London's [Data Protection Officer](#) – Albert Chan, for the investigation of disciplinary proceedings.

### Appointments & Practice Interviews

- Our appointments, drop-ins and practice interview discussions are held in confidence and information discussed will remain confidential within King's Careers & Employability.
  - Issues may be discussed between staff members in line with professional judgement, enabling us to ensure a full and flexible service to our stakeholders.
  - Neither the identities of our users nor the details of our contact with them will be provided to any other individual or organisation, either within King's College London or externally.

- Notes taken by Careers Consultants, Application Advisers and other King's Careers & Employability staff will be appropriate, factual and accessible to all staff within the department for the purposes of ensuring continuity and flexibility of service.
  - Users have access to view these notes at any time from their King's CareerConnect account.
- *In certain exceptional circumstances, King's Careers & Employability staff may be obliged to inform other services within King's or externally without prior consent, where there is a legal or 'duty of care' imperative. Where possible, appropriate discussions will be held to inform the individual that this is the case. These circumstances may include:*
  - *When an individual poses a risk to themselves or others*
  - *Where a legal obligation exists*
  - *Where a user has breached the university's regulations or policies.*

## Hard-copy Documentation

- Career Consultants, Application Advisers and other members of staff may from time to time comment on application documents that are sent outside the King's CareerConnect system. In these circumstances, the following actions apply:
  - After use, hard copies are immediately put into the confidential waste system to be disposed of by the University in accordance with waste disposal procedures.
  - Emails containing document attachments or links to document sharing platforms are deleted from all inboxes, sent items, and deleted items immediately after being sent.
  - Documents which have been downloaded are deleted from their storage locations (which may include the local downloads folders, desktop or other file locations) immediately after action has been taken with them.
- In some circumstances, staff may temporarily retain such documents but would always let the user know the reason why and agree a timeframe for deletion.
- Occasionally model documents are retained for use as teaching tools. In these circumstances, staff must retain written consent from the user and anonymise where asked.

## King's CareerConnect

King's CareerConnect (KCC) is the online platform which provides access to the majority of our services for our users, including appointments, events, award schemes, job opportunities, exclusive internships, organisation profiles and user records.

- King's Careers & Employability will have lawful basis to access information on relevant data subjects (including, but not limited to students, recent alumni, employers, third-party suppliers, staff and other clients) on the basis of public task outlined in General Data Protection Regulation (the "GDPR"), Article 6(1)(e).
- This data is submitted to King's College London (as the data controller) as part of the enrolment process or when registering for an account on King's CareerConnect.
- Data will be stored securely on your King's CareerConnect user profile, which is provided by Group GTI (as the data processor).
  - Group GTI has access to the system to investigate support issues only.

- King's Careers & Employability retains overall responsibility for all data within the database and King's Careers & Employability staff manage the system on a day-to-day basis by updating the appointments and event calendars, approving organisation and associated opportunities and making notes on users.
- The University's agreement with Group GTI explicitly defines the security levels that are in place to prevent unauthorised access; it also makes explicit mention that confidential information will not be made available to any third party, and that personal data is processed only within the terms of the contract agreement.
- No special category data is held within the King's CareerConnect system.
- If you enter incorrect log-in details five consecutive times, you will be blocked from accessing the system, and be required to email [careers@kcl.ac.uk](mailto:careers@kcl.ac.uk) to reset your account.
- The following statement has been supplied by our data processors, Group GTI:

*"GTI provides TARGETconnect (branded "King's CareerConnect" for King's College London), an appointment, opportunity, employer, student and event management system for institution careers and student services. It is a web based centrally hosted system provided for careers and student services.*

*Institutions are the data owners and maintain and control the data via direct database access and by using the web application. GTI are the data processors and only ever access the system to investigate support issues raised by the Institution.*

*The databases are stored in a secure datacentre and are only accessed by the Institution and GTI DBS checked employees for maintenance purposes.*

*Data is not shared with any other system unless with explicit agreement by the Institution and the user."*

**Group GTI, September 2016**

- To function properly, KCC requires some elements of student data to be fed into the system or added by new users. Under the GDPR, data subjects have the right of access to your personal data, to rectify, erase (in certain circumstances), restrict processing, object or define data portability.
- You can view the data held by King's Careers & Employability at any time by logging into your account and selecting 'my profile' from the menu.
  - **Students & Recent Graduates**
    - KCC is only accessible to students and recent graduates of King's College London, so the system needs to be able to recognise you as an authentic user; it is also required to enable you to book up for careers appointments and events.
    - The transfer of data is done via a secure, daily feed from a system called SITS, King's corporate student record system.
    - The data includes details such as:
      - Your full name
      - Gender and date of birth
      - Nationality and fee status

- Student number/'K' number
- Faculty, department and course
- Course length, start and end dates
- Student level and year of study
- Home campus
- Contact information (KCL or other email address, phone number(s))
- If you wish to amend this data, you will need to contact [Student Services](#) as King's Careers & Employability are unable to edit data within KCC which is transitioned from SITS.
- Data will be held for up to two years after you complete your studies at King's (or until [your access](#) to King's Careers & Employability is ended). After this time, all data held will be removed and/or deleted.
- **King's Research/Academic & Professional Services Staff**
  - When you register to access KCC, you will need to supply us with the following data:
    - Your full name
    - Faculty and department
    - Job title
    - Email address (@kcl.ac.uk)
    - Work phone number
    - User name
    - Password (encrypted)
  - Users can amend and/or remove these details at any time by logging into KCC. Data will be held for two years after which time we will prompt you to either reset your account or it will be terminated and all data held will be removed and/or deleted.
- **Employers & Organisations**
  - Please see our [Statement of Professional Standards/Terms & Conditions](#) for information on the information submitted and how we process your data.
- King's Careers & Employability will not share KCC subject data with other external parties for any purposes, other than if you have explicitly provided us with permission to do so. This includes:
  - Other King's College London departments\*
  - King's College London Students' Union (KCLSU)
  - Research Councils
  - Employers & Organisations
  - Other Users (e.g. students, alumni, research staff)

\*Excluding those areas where it is deemed in the legitimate interest (e.g. HESA Graduate Outcomes Survey)

- By completing a profile on KCC, you grant us permission to use your data to communicate with you information about the products or services we provide as King's Careers & Employability e.g. vacancies, events and appointments.

- Your contact details, including your email(s) and telephone number will also be used to provide further details, reminders and notifications regarding any activity booked through King's Careers & Employability and to request feedback on our services and activities.
- You remain in full control of your information and can adjust your email preferences by logging into your user profile at any time, or clicking the 'update profile' link at the bottom of KCC-generated emails.
- Users must opt-in to receive targeted mailings and newsletters from us, but core system messages will be related under our legal basis of public task.
- Any changes you request to how your personal information is processed for the purposes of marketing and/or the provision of service updates will be acted on promptly.

## King's Internships & King's Experience Awards

- In submitting an application/(s) for either a King's Internship or King's Experience Award, you agree that any documents uploaded (CV, cover letter, transcripts etc.) as part of your application(s) may be shared with external parties for the purposes of making decisions regarding your application, namely:
  - King's College London departments and/or faculties
  - External internship host employers
- Applicants will be prompted and reminded of this at the point of application and requested to tick a box confirming their consent to this transfer.
- Assessments or reports submitted to complete a King's Experience Award or participation in the Student Opportunity Fund are added to a submission repository for use by future participants, available to review by King's staff and students through secure platforms, and which may be shared in literature in hard or soft copy.
- Documents uploaded to King's CareerConnect can be amended and/or removed at any time by users.
- King's Careers & Employability will only transfer personal and/or sensitive category data outside the EEA to organisations that have completed the university's standard Data Protection (Controller-Controller) Template Agreement.

## Feedback & Focus Groups

- King's Careers & Employability regularly seek qualitative and quantitative feedback on our services, in order to ensure we are meeting user need.
  - Feedback provided to King's Careers & Employability through online or paper forms, at focus groups, through surveys, interviews or other electronic or physical formats will be anonymised before circulation.
  - Surveys will not actively ask users' names or other identifiable personal data.
- Where users are audio recorded for the purpose of creating a transcription of their comments, this recording will be deleted upon completion of that transcript.
- Throughout the process of capturing, processing and presenting qualitative data, King's Careers & Employability will be mindful of ensuring users are not individually identifiable.
- In any commentary or qualitative feedback users will be identified alpha-numerically, rather than by name ('User A', 'User B').

- Any personally identifiable information will be removed before circulation. Personally identifiable information in this context would include (but is not limited to) users' names, contact details and user IDs.
- Where a cohort is very small (e.g. a user in a focus group identifies themselves as being on a course which has a very low number of user) the course details will be omitted.
  - In this case we may use faculty level instead, if appropriate. Similarly, where a user identifies themselves as having attended at an event which had very low attendance, we will also remove reference to this event.
- Where feedback is supplied through online systems which link back to a student record (e.g. King's CareerConnect surveys), personally identifiable information will be removed before this data is shared with any parties within beyond King's Careers & Employability.

## Graduate Outcomes Survey (GOS)

- King's College London is required by law to pass details of all recent graduates to the Higher Education Statistics Agency (HESA) for the purposes of conducting the Graduate Outcomes Survey (GOS) at approximately 15 months after your graduation date.
- The processing of this information is conducted on the basis of public task outlined in General Data Protection Regulation (the "GDPR"), Article 6(1)(e).
- The following is taken from the HESA website (at April 2018):

*"Data will be processed for a variety of public interest purposes, including:*

- *Meeting the requirements on providers to give information to public authorities with responsibility for funding and regulating higher education in the UK. This applies to the collection, transfer and onward use of both contact details and survey responses, by HE providers, the survey contractor, HESA and HESA's statutory customers.*
- *Making available to the public accurate and transparent data on the outcomes of publicly funded and subsidised higher education.*
- *While there will be no compulsion on graduates to complete the survey, any survey response data will be processed under the public interest grounds described above and not processed on the basis of consent.*
- *Survey response data will only be processed by HESA and its customers for research and statistical purposes and will not be used to make decisions about individuals."*

See the HESA Student Collection Notice for full details.

## Exclusive Online Resources & Subscriptions

- King's Careers & Employability provides exclusive access to online resources, namely:
  - InterviewStream
  - AssessmentDay
  - GoinGlobal through our membership of The Careers Group, University of London.
- Neither King's College London, nor The Careers Group maintain records of student registration details, recordings or results and these will not be shared with us unless presented by users through a careers guidance appointment and/or practice interview session.

- King's Careers & Employability provides access to Vault through the core King's Libraries catalogue, using your core IT details.

## Photography, Recording & Filming

- King's Careers & Employability reserves the right to take photographs/video at events held on campus or hosted by us at employer premises or alternative venues.
  - Images/video taken may be used for marketing materials in both print and digital form and available to both internal and external audiences.
  - Testimonials provided as part of an internship reflection or award ceremony may be shared with both internal and external audiences.
  - By attending our events you are agreeing with the disclaimer present on King's CareerConnect which grants King's Careers & Employability permission to undertake photography/filming/audio recording and use these media in our marketing.
  - If, for whatever reason, you wish for an image/video to be removed please contact [careers@kcl.ac.uk](mailto:careers@kcl.ac.uk) and this will be actioned within 14 days of receipt of your request.
- King's Careers & Employability takes no responsibility for photos/video taken at events and activities run by external parties and/or employers.

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If you have any further queries, need assistance or have a complaint about how your data has been used please [contact us](#) or King's Information Compliance Team.

Our appointed Data Protection Officer is Albert Chan, Assistant Director of Business Assurance:

Email: [info-compliance@kcl.ac.uk](mailto:info-compliance@kcl.ac.uk)

Tel: +44 (0)20 7848 7816

Web: [Information Compliance](#)

- [King's College London - Governance Zone](#)
- [GTI TARGETconnect](#)
- [General Data Protection Regulation \(GDPR\)](#)
- [Information Commissioners' Office](#)

This statement is reviewed and updated annually.

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**Last updated: February 2019**

*Update: Clarification of the term 'user' and 'applicant' within notice and updated link to HESA Graduate Outcomes Privacy Notice. Merge of KCC Privacy Notice into main notice.*

*King's Careers & Employability is a member of the [Association of Graduate Careers Advisory Services \(AGCAS\)](#) and as such upholds their codes of best practice in graduate recruitment.*