

# Privacy notice for King's recruitment activities

Last updated: 3 June 2020

Human Resources at King's College London uses your personal information in a variety of services including recruitment, diversity and inclusion, technology solutions, and reporting and analytics.

This privacy statement can be used in conjunction with [King's College London's Core Privacy Notice](#) and [King's College HR Privacy Notice](#). If you have any queries about this privacy statement, please contact:

- Human Resources, Room 6.13 James Clerk Maxwell Building, 57 Waterloo Road, London SE1 8WA or email [hr@kcl.ac.uk](mailto:hr@kcl.ac.uk)

This privacy statement explains the kinds of information we obtain from or about you when you register with and/or apply for a job through the King's College London Application Portal and progress through the recruitment process. It also applies to individuals whose details King's College London have obtained from publicly accessible sources for example corporate websites, LinkedIn, personal websites.

King's College London respects your right to privacy, and we are committed to complying with applicable data protection and privacy law in the UK.

Any personal information which you provide to us and/or which we obtain about you will be kept secure and confidential using appropriate organisational and technical measures.

## What personal information do we collect?

The information we collect and process for job applicants includes:

- Your name, address, telephone number, email address, and contact details of those you wish for us to contact on your behalf in an emergency
- Proof of your right to work in the UK
- Your date of birth, sex, ethnicity, disability status and sexual orientation, which we use for equalities monitoring purposes.

We know that our people at King's are drawn from a vast number of different backgrounds and walks of life, and that it is this diversity of backgrounds, as well as talents and ideas that make us the best that we can be. By filling in the equal opportunity data, you are actively contributing to a better understanding of who we are at King's, and how we can create the best conditions for everyone to contribute and thrive, while bringing their whole selves to work.

- Your employment history prior to working at King's, other relevant experience, achievements, skills and qualifications
- Views and opinions (from referees and/or sources) where applicable
- Previous and current compensation (where permitted by applicable legislation)
- Clinical registration (if relevant)
- Your employment references and the results of any pre-employment screening such as Occupational Health clearance
- The outcome and results of any interviews or tests which formed part of the recruitment process.

Our processing of this data will take place in line with the requirements of data protection legislation.

For those individuals whose details King's College London have obtained from publicly accessible sources we will generally only collect;

- Name
- Job title
- Career biography
- Place of employment
- Contact details

## **Why we process your data**

As data controller King's College London can process your personal information under the Data Protection Act 2018 and subsequent enactments (including the EU General Data Protection Regulation, or "GDPR", which came into force on 25 May 2018).

We process your personal information to enable us to:

- Make decisions regarding our processing of your job application
- Make contact with you regarding your application and its status
- Enable business decision making and people planning at King's
- To provide you with information about job vacancies within King's and possible partner organisations
- Provide information for diversity and inclusion projects including Athena Swan, Race Equality Charter Mark, and Stonewall.
- To find, contact and assess the suitability of academics and professionals for senior roles within King's College London.

## **What difference will my equal opportunity data make?**

By updating your equal opportunity data, you allow us to build up a more comprehensive picture of our staff profile in terms of equality data, highlighting areas of under-representation so we can take targeted action that responds to local needs of under-represented groups, and mitigate against potential discriminatory impacts that proposed policies and initiatives might have on different groups.

Effective use of our equal opportunity data sends a strong signal to staff and potential job applicants that King's is committed to true inclusion and to supporting a diverse workforce. In turn, this contributes to the raising of our profile as an inclusive university, which has a positive impact on attracting staff and students regardless of age, disability, gender reassignment, race, religion or belief, sex, sexual orientation, marriage and civil partnership, and pregnancy and maternity.

It only takes five minutes to update your equal opportunity data, and by doing so, you will be helping to build a valuable data set that we can use to help create a fully inclusive environment.

For staff with a disability, disclosing this to your line manager, in addition to confidentially via HR Digital Services, can have a positive effect on your working relationship.

## **How do we collect your data?**

### **Direct collection**

We collect data to operate effectively and provide you with the best experience at the university. You provide some of this data directly to us when you engage with us as a potential candidate and/or apply for a job at King's. Some additional data may be provided by referees (a referee is a person who provides a

personal or work reference in respect of a candidate) and sources (a source is a person who provides us with information or intelligence about a candidate).

We rely on referees and sources to only provide personal data that they have a lawful basis for providing and that they have complied with the data protection legislation and the terms of this notice.

You have the right to decline to provide personal data. However if you choose not to provide data that we deem necessary we reserve the right not to consider you for an appointment.

### **Indirect collection**

We also obtain data from third parties when a particular pre-employment check is required, e.g. from UK Government departments, namely:

- UK Visas and Immigration (UKVI)
- Disclosure & Barring Service (DBS).

We also collect information from publicly accessible sources when we are identifying and assessing the suitability of academics and professionals for senior roles within King's College London.

## **Who do we share your data with?**

Your information may be disclosed for the purposes set out above to teams in HR, to the hiring manager, senior management at King's and to authorized agents for the university such as external interview panel or search committee members. Your information is not shared without a legitimate business reason.

Our third party services providers perform functions on our behalf and have access to personal information needed to perform their functions, but may not use it for other purposes. Further, they must process the personal information in accordance with this Privacy Notice and as permitted by applicable data protection laws.

## **How do we protect personal information?**

Our systems, drives and email accounts are secure and accessible only by authorised users whose access is administered based on the specific requirements of their roles. We use the 'privacy by design' approach to all new data processing activities.

We take appropriate measures to ensure that the information disclosed to us is kept secure, accurate and up to date and kept only for so long as is necessary for the purposes for which it is used. The Information Compliance team is consulted in early stages on new large scale personal information processing activities to advise how the processing activities can adhere to data protection legislation.

- All staff in HR complete mandatory data protection training
- Confidential data sent in emails is encrypted and / or password protected
- Access to shared folders where personal information is stored is restricted
- Systems access is restricted to authorised users
- Security profiles within systems ensure users can only access the records and information they need to do their jobs
- 'Privacy by design' as a principle in HR's digital services and other initiatives
- Personal and sensitive data processing to inform diversity and inclusion initiatives are carried out at an aggregate level and this processing does not allow the identification of individuals.

HR monitors and regularly checks that these measures are implemented.

## How we keep your data secure in other countries?

For the standard recruitment process, we do not transfer personal data outside of the EU/EEA unless we have security measures and approved contracts in place to protect your personal data, such as a volunteer agreement and the relevant transfer mechanism obtained. In exceptional circumstances our executive search team may send out access to personal data as part of assessment reports to panel/committee members who are outside the EU/EEA and are not King's employees. In these instances all data is accessed through encrypted file sharing programmes such as SharePoint to ensure that your data is protected and remains within King's IT systems.

## Your rights

As data controller the university will process your personal information in accordance with your rights under data protection legislation.

Your rights are:

- right to be informed
- right to gain access to your data
- right of rectification
- right to erasure
- right to restriction
- right to portability
- right to object
- right not to be subject to automatic profiling or decision making.

If you have any queries in relation to how your rights are upheld, please contact us within HR at [hr@kcl.ac.uk](mailto:hr@kcl.ac.uk) or [info-compliance@kcl.ac.uk](mailto:info-compliance@kcl.ac.uk) to contact the Information Compliance team.

Requests from individuals to [access their personal information](#) will be managed in accordance with the [Information Commissioner's Subject Access Code of Practice](#). To find out more information on how to make a subject access request please visit our [Requests for Personal Information webpage](#).

## How long do we keep your data for?

The university will only keep your personal data for as long as it is necessary for the purpose for which it is processed.

Personal data is processed and stored in line with the university's [retention and disposal schedule](#) which sets out how long different categories of personal data should be held by the university. Please refer to sections 11.14 Recruitment, or 11.41 King's Search – Leadership recruitment.

In some circumstances we will anonymise rather than securely dispose of your personal data (so that it can no longer be associated with you). We may retain this anonymized data indefinitely for research or statistical purposes without further notice to you.

## Changes to this notice

The university may amend this privacy notice to reflect changes in our processing of data.

The university encourages you to periodically review this notice to be informed of how the institution is protecting your privacy.

## **Lawful basis for processing personal information**

The lawful basis on which we process the personal information of our applicants is for legitimate business interests, i.e. enabling King's to make effective decisions regarding the hiring of staff and for the purpose of a contract.

There are sometimes circumstances in which we process your personal information on the lawful basis of legal obligation, for example transferring data between King's and government departments for the purposes of UKVI, DBS or tax administration.

For further information on the lawful bases for processing personal information, read the [guidance from the ICO](#).

## **Data Protection Officer (DPO)**

King's College London's Data Protection Officer is:

**Albert Chan**

**Assistant Director of Business Assurance (Information Compliance) and Data Protection Officer**

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