

PRIVACY NOTICE FOR STAFF AND PROSPECTIVE STAFF

About this document

This privacy notice (**Notice**) explains how Imperial College of Science, Technology and Medicine (the university, Imperial, we, our, us) processes the personal data of our staff (including workers such as casual workers), prospective staff (i.e. job applicants), visiting academics and researchers, honoraries, secondees and when you leave the university as former staff members (**you, your**), and your rights in relation to the personal data we hold.

This Notice applies alongside any other information the university may provide about a particular use of personal data and in addition to other relevant terms and conditions and policies, including:

- any contract between Imperial and its staff;
- Core Terms and Conditions of Service <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/hr/public/termsconditions/Core-Terms-and-Conditions.pdf>;
- the Data Protection Policy / <https://view.officeapps.live.com/op/view.aspx?src=https%3A%2F%2Fwww.imperial.ac.uk%2Fmedia%2Fimperial-college%2Fadministration-and-support-services%2Fsecretariat%2Fpublic%2Finformation-governance%2FData-Protection-Policy.docx&wdOrigin=BROWSELINK>;
- the Information Security Policy / <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/college-governance/charters-statutes-ordinances-regulations/policies-regulations-codes-of-practice/information-systems-security/Information-Security-Policy-v7.0.pdf>;
- the Information Governance Policy Framework / <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/secretariat/public/information-governance/Information-Governance-Policy-Framework---to-be-reviewed.pdf>;
- Data Protection and Information Security Codes Of Practice / <https://www.imperial.ac.uk/admin-services/governance/policies-and-guidance/data-protection-and-information-security-codes-of-practice/>.

For the purposes of any applicable data protection laws in England and Wales, including the Data Protection Act 2018 (DPA) the UK General Data Protection Regulation (UK GDPR) and General Data Protection Regulation EU 2016/679 (EU GDPR), Imperial is the data controller of your personal data.

How your personal data is collected

Imperial collects your personal data from the following sources:

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- when you request information / assistance via an online form;
- via affiliate partners that you have consented / requested to provide Imperial with your data. This could include recruitment providers, partnership websites and / or job mailing lists;
- from the information you provide to us before making a job application, for example when you come for an interview;
- when you submit a formal application to work for us, and provide your personal data in application forms and covering letters, etc;
- from third parties, for example the Disclosure and Barring Service (DBS) (if this is applicable – see the section below on *Criminal convictions*) and your previous or current employers, in order to verify details about you and/or your application to work for us;
- during the course of your employment or engagement with us, as a member of staff, for example when you provide or update your contact details, when you or another member of staff completes paperwork regarding your performance appraisals, when you take part in an activity / event and in the course of fulfilling your employment (or equivalent) duties more generally; and
- in various other ways as you interact with us during your time as a member of staff, and afterwards, where relevant, for the various purposes set out below.

What categories of personal data are collected?

We may collect and process the following types of personal data about you (and your family members / 'next of kin', where relevant):

- contact and communications information, including:
 - your contact details (including email address(es), telephone numbers and postal address(es));
 - contact details for your family members and 'next of kin', in which case you confirm that you have the right to pass this information to us for use by us in accordance with this Privacy Notice;
 - records of communications and interactions we have had with you;
- biographical, educational and social information, including:
 - your name, title, gender, nationality and date of birth;
 - your image and likeness, including as captured in photographs taken for work purposes or CCTV;
 - details of your education and references from your institutions of study;
 - lifestyle information and social circumstances;
 - your interests and extra-curricular activities;

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- information that evidences periods of residency (such as utility bills, proof of mortgage and travel) or financial circumstances (such as bank statements and proof of income);
- information that evidences your family relationships (such as a birth, adoption, marriage or civil partnership certificate);
- national insurance number (or other tax identification number) and your passport number or national identity card details, country of domicile and your nationality. We will also allocate you a unique staff number and username;
- financial information, including:
 - your bank account number(s), name(s) and sort code(s) (used for paying your salary and processing other payments);
 - your tax status;
 - pension membership;
 - Gift Aid declaration information, where relevant (for example, where we help you to administer donations to charity from your pre-taxed earnings);
- work related information, including:
 - details of your work history and references from your previous employer(s);
 - your personal data captured in the work product(s) you create while employed by or otherwise engaged to work for Imperial;
 - communications sent or received using Imperial's communication systems;
 - details of your professional activities and interests;
 - your involvement with and membership of sector bodies and professional associations;
 - information about your employment and professional life after leaving Imperial, where relevant (for example, where you have asked us to keep in touch with you);
- and any other information relevant to your employment or other engagement to work for Imperial.
- online and transactional
 - details of your IP address, browser type and operating system when you visit our website. See Imperial's Use of Cookies site / <https://www.imperial.ac.uk/about-the-site/use-of-cookies/> for more information.;
 - Details of your interactions with digital advertising.

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Where this is necessary for your employment or other engagement to work for us, we may also collect special categories of data and information about criminal convictions and offences, including information:

- revealing your racial or ethnic origin, and sex life or sexual orientation;
- concerning trade union membership;
- information concerning your health, medical conditions and disabilities;
- concerning criminal convictions (see the section below on *Criminal convictions*).

The basis for processing your personal data, how we use that data and with whom we share it

We will process your personal data either in ways you have consented to, or because it is otherwise necessary for another lawful purpose. We set these out as follows:

(i) Performance of a contract with you

We process your personal data because it is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract, such as a contract of employment or other engagement with us. In this respect, we use your personal data for the following:

- administering job applications and, where relevant, offering you a role with us;
- carrying out due diligence checks on you, whether during the application process for a role with us or during your engagement with us, including by checking references in relation to your education and your employment history;
- once you are employed or engaged by us in any capacity, for the performance of the contract of employment (or other agreement) between you and us;
- to pay you and to administer benefits (including pensions) in connection with your employment or other engagement with us;
- monitoring your attendance (including absence) and your performance in your work, including in performance appraisals;
- publishing the work product(s) you create while employed by or otherwise engaged to work for Imperial;
- for disciplinary purposes, including conducting investigations where required;
- for other administrative purposes, for example to update you about changes to your terms and conditions of employment or engagement, or changes to your pension arrangements etc.;
- for internal record-keeping, including the management of any staff feedback or complaints.

(ii) Legitimate Interests

We process your personal data because it is necessary for our or a third party's legitimate interests. Our "legitimate interests" include our interests in running the university in a professional, sustainable manner, in accordance with all relevant legal and regulatory requirements. In this respect, we use your personal data for the following:

- providing you with information about us and what it is like to work for us (where you have asked for this, most obviously before you have made a formal application to work for us);
- for security purposes, including by operating security cameras in various locations on the university premises and the production of photo ID cards;
- to enable relevant authorities to monitor the university's performance and to intervene or assist with incidents as appropriate;
- to provide education services to students (including the recording of audio/images during lectures as part of teaching provisions and for subsequent use in teaching materials);
- to undertake, manage and administer surveys, which are optional to complete, to gain feedback from staff directly and help identify trends and possible improvements across the university;
- to safeguard students' welfare and provide appropriate pastoral care;
- to carry out or cooperate with any internal or external complaints, disciplinary or investigatory process;
- to administer Imperial's regulations, codes of practice and policies;
- for the purposes of management planning and forecasting, research and statistical analysis and benchmarking;
- for the development of Imperial-wide strategic initiatives;
- in connection with organising events and administration of your social and sporting activities (e.g. relating to your use of the Imperial sports facilities);
- making travel arrangements on your behalf, where required;
- contacting you or your family members and 'next of kin' for business continuity purposes, to confirm your absence from work, etc;
- publishing your image and likeness in connection with your employment or engagement with us;
- promoting the university and its goods, services, events and resources, unless it is appropriate to gain your specific consent;
- to monitor (as appropriate) use of the internal IT and communications systems in accordance with the Information Security Policy.

(iii) Legal Obligations and the Imperial's public task

As a provider of higher education, Imperial is in certain respects a public authority. Your personal data will also be processed by the university for compliance with relevant legal obligations or as part of its public interest task. For example:

- to meet our legal obligations (for example, relating to child protection, diversity and gender pay gap monitoring, employment, health and safety, statutory reporting to the Higher Education Statistics Agency (HESA));
- for tax purposes, including transferring personal data to HM Revenue and Customs to ensure that you have paid appropriate amounts of tax, and in respect of any Gift Aid claims, where relevant;
- for compliance with immigration laws and rules;
- for the prevention and detection of crime, and in order to assist with investigations (including criminal investigations) carried out by the police and other competent authorities;
- Where a legislative requirement compels the university to do something.

Special category and Conviction data

In addition to the above, Imperial may process types of personal data that the law considers to fall into a special category (such as race, religion, health, sexual life) or criminal records information. As part of our statutory and corporate functions, we will process special category data and conviction data. This will be in accordance with our Special Category Data Policy / <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/legal-services-office/public/data-protection/Special-Category-and-Criminal-Offence-Data.pdf> ;

In particular, we process the following types of special category personal data for the following reasons:

- your physical or mental health or condition(s) (for example, where required to monitor and record sickness absences, dietary needs, or to make reasonable adjustments to your working conditions or environment – including as part of the recruitment process if necessary);
- in order to monitor our compliance with equal opportunities legislation relating to protected characteristics to ensure and improve representations across roles and activities;
- trade union membership, in connection with your rights as an employee and our obligations as an employer (to the extent necessary);
- categories of your personal data which are relevant to investigating complaints made by you or others, for example concerning discrimination;
- categories of your personal data which are relevant to administering family friendly leave;

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- where it is necessary for statistical or research purposes and adheres to a substantial public interest; for example, for researching the diversity of our staff where required by external partners (in the case of providing university / Faculty figures as part of a publication or grant application. Also where identifying and reviewing such data helps to identify bias and help in determining strategies to promote and build a fairer more inclusive university environment.

In all cases we will evaluate the benefits of our use of your personal information in this way against the possible impact on your rights and freedoms and any damage or distress you are likely to be caused as a result of such processing, and will not use this research or analysis in any way that will result in a direct decision or measure affecting you personally. If it is lawfully and ethically appropriate to do so, we may also seek your explicit consent to use your data in this way.

We will also process special categories of personal data because:

- it is necessary to protect your or another person's vital interests, for example, where you have a life-threatening accident or illness in the workplace and we have to process your personal data in order to ensure you receive appropriate medical attention;
- it is necessary for the establishment, exercise or defence of legal claims; or
- we have your explicit consent to do so.

Criminal convictions

You will be asked to provide the university with details of criminal convictions where your role, or a project you volunteer or are employed to undertake requires a DBS check. A DBS check will only be conducted under the lawful process provided for by law. We will only use the criminal convictions data for the purpose it was collected and it will only be retained for a limited period as set out in the Retention Policy (see the section below: *How long your information is kept*).

Sharing your information with others

For the purposes referred to in this privacy notice and relying on the basis for processing as set out above, we will share your personal data with certain third parties. Depending on your employment status and role, we may disclose limited personal data to a variety of recipients including:

- other employees, agents, contractors and service providers (e.g. third parties processing data on our behalf as part of administering payroll services, the provision of benefits including pensions, etc.) including currently the following service providers:
 - Cornerstone are the software providers and owners of TalentLink. TalentLink is the university's applicant tracking system. It is a cloud-based system with a data centre currently located in Germany. TalentLink is where Imperial stores applicants' data for job requisitions across the university. This system allows the university to conduct an end-to-end recruitment process from the initial application through to screening, interviewing and on-boarding. It also allows Imperial to report on all application data.
 - The Access Group who are the software providers of TeamSeer, Imperial's online absence management system. The system has been developed to manage staff availability, e.g. holiday, sickness, and other absence types;

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- Next Jump who provide Perks at Work – an exclusive shopping platform that allows staff to save money online, in-store and via mobile. Imperial only shares the name, email address and dates of employment of members of staff to enable them to be identified as staff and registered with Perks at Work. Any other information staff provide to Next Jump as part of the registration process is processed by Next Jump in accordance with their privacy policy which is available on their website;
- Computershare Voucher Services who are one of the UK's largest childcare voucher providers. Staff can register to receive Child Care Vouchers online with Computershare Voucher Services but limited staff personal data is shared prior to registration for the purposes of identification;
- CRM Platforms (HubSpot & Salesforce) to manage data reporting within our marketing and recruitment activities – if applicable.
- the providers of surveys such as, ORC International, for the purposes of benchmarking against other employers or to comply with legal obligations;
- students, where this is required for your role;
- DBS and other relevant authorities and agencies such as the Higher Education Statistics Agency (HESA) who will use such information as described in the applicable HESA data collection notice located at <https://www.hesa.ac.uk>, the Department for Education, the Office of the Independent Adjudicator, the Office for Students and the local authority;
- other entities in Imperial's Group such as Imperial Consultants (**ICON**), a subsidiary of Imperial, who offer opportunities in consulting services;
- partner institutions, research organisations and other bodies involved in the delivery of a course or programme;
- relevant professional bodies where this is a requirement in connection to your role;
- the Medical School Council where it is required as part of their 'Clinical Academic Staff Survey', for more information about how the GMC will process the personal data provided to them please see <https://www.medschools.ac.uk/privacy-statement>;
- sponsors, including the UK research councils and other external bodies who fund awards;
- HMRC and our internal and external auditors;
- our advisers where it is necessary for us to obtain their advice or assistance;
- law enforcement agencies; local authorities; the Home Office, British overseas consulates; other international and national governmental and regulatory bodies;
- with other employers in the form of a reference, where we are asked for it or we are required to do so in compliance with our legal obligations or regulatory rules;
- third parties and their advisers where those third parties are acquiring or considering acquiring Imperial assets;

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- accreditation and award bodies such as Advance HE (an agency formed by the merger of the Equality Challenge Unit, the Higher Education Academy and the Leadership Foundation for Higher Education). Advance HE is a charity whose purpose is to advance the professional practice of higher education to improve outcomes for the benefit of students, staff and society. Advance HE administers the Athena SWAN national network to encourage and recognise commitment to address gender equality in higher education and research. When a department applies for an Athena SWAN award, staff personal information is included in the award application and shared with Advance HE for assessment of the application. Successful applications are then customarily published on the relevant university's website to share any valuable learning but personal information is redacted unless staff specifically consent to their information being unredacted in the application prior to its publication.

As well as the organisations mentioned above, we may in specific circumstances need to share your personal data with third parties who have made legitimate requests under data protection or freedom of information law. We may also share data when Imperial is legally required to do so (by a court, government body, law enforcement agency or other authority of competent jurisdiction).

International transfers of data

Imperial will, in limited circumstances, disclose personal data to third parties, or allow personal data to be stored or handled, in countries outside the European Economic Area. For example, we will transfer data to:

- partner institutions or organisations who are based in other countries; and
- IT or other service providers based overseas.

In these circumstances, your personal data will only be transferred on one of the following basis:

- the transfer is subject to one or more of the "appropriate safeguards" for international transfers prescribed by applicable law (e.g. data transfer assessments and standard data protection contract clauses adopted by the European Commission and UK Government respectively);
- a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection; or
- there exists another situation where the transfer is permitted under applicable law (for example, where we have your explicit consent).

How long your information is kept

Personal data is stored in accordance with Imperial's retention schedule which is available via <http://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/records-and-archives/public/RetentionSchedule.pdf>.

We will only retain your personal data for as long as necessary to fulfil the purposes we collect it for. To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data (such as operational, contractual, legal, accounting or reporting requirements)

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and whether we can achieve those purposes through other means, and the applicable legal requirements.

For the avoidance of doubt, job applications via TalentLink will be stored for a period of one year from receipt and will be archived after that time (for research and statistical evaluation purposes) with any identifiable personal data being removed unless the application is successful, in which case the job application and personal data within it will become part of the relevant person's staff file. If a job applicant consents to being included in the Talent Database of TalentLink so that they can be contacted and linked to other job vacancies in the future, their personal data will also be held for a period of one year and will be archived after that time (also for research and statistical evaluation purposes) with any identifiable personal data being removed.

Your rights

Under data protection legislation, you have the following rights:

- to obtain access to, and copies of, the personal data we hold about you;
- to require that we cease processing your personal data if the processing is causing you damage or distress;
- to require us not to send you marketing communications;
- to request that we erase your personal data, for more information please see;
- to request that we restrict our data processing activities in relation to your personal data;
- to receive from us the personal data we hold about you, which you have provided to us, in a reasonable format specified by you, including for the purpose of transmitting that personal data to another data controller; and
- to require us to correct the personal data we hold about you if it is incorrect.

Further details relating to all rights listed above are available via <https://www.imperial.ac.uk/admin-services/governance/policies-and-guidance/guidance/guide-10/>.

Please note that the above rights are not absolute, and requests may be refused where exceptions apply. You can find out more about your rights at www.ico.org.uk.

If you have any questions about these rights or how your personal data is used by us, you can contact the Data Protection Officer using the following details:

- Post – Data Protection Officer, Imperial College London, The MediaWorks, 191 Wood Lane, W12 7FP
- Email – DPO@Imperial.ac.uk

Contact and complaints

The ICO does recommend you seek to resolve any issues with the data controller initially prior to any referral to it. If you have any queries about this privacy notice or how we process your personal data, or if you wish to exercise any of your rights under applicable law, you may contact

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your line manager or the Data Protection Officer whose details are set out in the section *Data controller and Data Protection Officer details* above.

If following such referral you are still not satisfied with how your personal data is used by Imperial you can make a complaint to the Information Commissioner (www.ico.org.uk). Full details regarding how complaints are managed is explained in the associated Complaints and Grievance Plan / <https://www.imperial.ac.uk/media/imperial-college/administration-and-support-services/legal-services-office/public/data-protection/Complaints-and-Grievance-Plan.pdf>

This notice

The university will update this Privacy Notice from time to time. Any substantial changes that affect your rights will be provided to you directly as far as is reasonably practicable.

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