

# **HR Privacy Notice**

#### Introduction:

The Royal College of Surgeons of Edinburgh (RCSEd) is committed to protecting your personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. This notice explains how and why we collect, use, and protect your personal information when you enter into a contract of employment, supply a reference or have any other interact with the HR department. This notice applies to current and former employees, self-employed contractors and consultants.

### Who We Are:

The department operates under the Royal College of Surgeons of Edinburgh, which is the data controller responsible for processing your data.

Data Controller: Royal College of Surgeons of Edinburgh

Registered with the Information Commissioner's Office (ICO), Reg. No. Z5806303

Email: dataprotection@rcsed.ac.uk

To read our full Privacy Policy please visit: Privacy Policy | RCSEd

### **Legal Basis for Processing:**

We process your personal data under one or more of the following legal bases:

- Consent: When you provide clear, informed permission (e.g. marketing emails). You can withdraw your consent at any time.
- Contract: When processing is necessary to fulfil a service, you requested.
- Legal obligation: To meet our statutory and regulatory duties
- Legitimate interest: To manage operations and improve services (balanced with your rights).
   We're collecting or using your information because it benefits you, our organisation or someone else, without causing an undue risk of harm to anyone.

## **What Information We Collect:**

| Categories    | Data Types  | Reasoning/Additional information |  |  |
|---------------|---|----------------------------------|--|--|
| Identity Data | ID information including:  Name(s)  Date of birth  National Insurance number  Photographic identification       | • Contract                       |  |  |
| Contact Data  | <ul> <li>Name(s)</li> <li>Address Telephone number/mobile<br/>number</li> <li>Personal email address</li> </ul> | • Contract                       |  |  |



| Career/Professional | <ul> <li>Documentation confirming your rig<br/>to work in the UK</li> </ul> | tht • Legal obligation |
|---------------------|---|------------------------|
|                     |   |                        |
|                     |   |                        |
|                     |   |                        |
|                     |   |                        |
|                     |   |                        |
|                     |   |                        |
|                     | Job role  |                        |
|                     | Employee number   | Contract               |
|                     | Work email address  |                        |
|                     | Copy of offer letter  |                        |
|                     | Employment contract (start and lea  |                        |
|                     | dates, salary, changes to employme contract or working patterns)            | ent                    |
|                     | References (received from a third   |                        |
|                     | party)  |                        |
|                     | Information confirming you have re  | ead                    |
|                     | and understood our policies and procedures                                  |                        |
|                     | Time spent working (timesheets,   |                        |
|                     | clocking in or out)   |                        |
|                     | Leave (sick leave, holidays, jury dut                                       | y,                     |
|                     | sabbatical and special leave)   |                        |
|                     | Swipe Card data (name, job role,  | ,                      |
|                     | photograph and access to buildings  |                        |
|                     | Qualifications, skills experience and                                       |                        |
|                     | employment history (including star<br>and end date with previous employ     |                        |
|                     | Information relating to performance   | •                      |
|                     | at work (annual reviews, appraisals   |                        |
|                     | and training needs)   |                        |
|                     | Training and development records  |                        |
|                     | Information and correspondence  |                        |
|                     | relating to your probation period   |                        |
|                     | Information and correspondence  |                        |
|                     | relating to any grievance procedure   | • Consent              |
|                     | Information and correspondence  |                        |
|                     | relating to a potential or actual   |                        |
|                     | redundancy  |                        |
|                     | Correspondence to and from you  |                        |
|                     | Publicity photographs and/or  | Legitimate interest    |
|                     | video/digital images  |                        |



|                                 | <ul> <li>Images of you on the CCTV network</li> <li>Information from your exit interview</li> </ul>   |   |                  |
|---------------------------------|---|---|------------------|
| Finance Data                    | <ul> <li>Bank account details</li> <li>Tax Code</li> <li>Salary and other payments made</li> <li>Overtime or other allowances paid (travel expenses)</li> <li>Pension scheme membership</li> <li>Details of current and past salary and pension contributions (Additional Voluntary Contributions)</li> </ul> | • | Contract         |
| Special Category<br>Data        | <ul> <li>Emergency contract details</li> <li>Next of kin</li> <li>Criminal convictions or offences</li> <li>Any medical or conditions</li> </ul>  | • | Legal obligation |
| Equality Monitoring Information | <ul> <li>Gender</li> <li>Martial or civil partnership status</li> <li>Disability status</li> <li>Race</li> <li>Ethic origin</li> <li>Religion or religious beliefs</li> <li>Sexual orientation</li> <li>Trade union membership (applies only if you choose to pay by salary deductions)</li> </ul>            | • | Consent          |

## **How We Collect Your Information:**

- Directly from you
- Previous employers
- Pension administrators or government departments (HMRC and DWP)
- UK Visas and Immigration

# **Sharing Your Information:**

The College uses third parties to process personal data on its behalf (acting as data processors). A written contract will ensure that any personal data shared will be held in line with data protection law and that the third parties have appropriate security measures in place in relation to your personal data. The College may share your personal data with the following:

- UK Visas and Immigration
- HM Revenue and Customs



- Pension schemes
- Trade Unions
- Department of Work and Pensions (DWP)
- Child Maintenance Service as required by the Child Support Information Regulations 2008
- Employee benefit schemes
- Training providers
- Individuals who exercise their legal right to access recorded information held by the RCSEd under information legislation, this is specific to data protection law (General Data Protection Regulation (GDPR) and Data Protection Act 2028).

Please check the privacy policies of the relevant third-party providers to fully understand how they will process your data.

#### How We Use Your Information:

Following initial recruitment, we will process the personal information provided to the College for the following uses:

- Managing your contract
- · Recruitment and onboarding
- Performance Management
- Employee Engagement
- HR Analytics
- Inclusion and Diversity
- Reward and Recognition
- Learning and Development
- Workforce planning

### **Retention of Your Data:**

We will keep your personal data for no longer than is necessary to fulfil the purposes for which it was collected and to satisfy any legal, regulatory, accounting or reporting requirements. We regularly review our data retention schedules and apply secure disposal methods when data is no longer needed. Contact us if you wish to see the retention schedule.

# **Your Rights:**

You have rights under data protection law, including to:

- Access your data
- Correct inaccurate data
- Request erasure (where legally permissible)
- · Restrict or object to processing



- Withdraw consent at any time (where processing is based on consent)
- Lodge a complaint with the ICO (www.ico.org.uk)

To exercise these rights, contact: <a href="mailto:dataprotection@rcsed.ac.uk">dataprotection@rcsed.ac.uk</a>

## **Security of Your Data:**

We take appropriate technical and organisational measures to secure your data, including:

- Secure servers and encrypted storage
- Access controls and staff confidentiality training.
- Secure offsite storage.

## **Data Protection Impact Assessments (DPIAs):**

Where new or high-risk processing is planned, we undertake DPIAs to assess and mitigate privacy risks in accordance with UK GDPR guidance.

## **Changes to This Notice:**

This notice is reviewed regularly and may be updated. The latest version will always be available on our website.

Last Updated: November 2025