Royal Conservatoire of Scotland

Privacy Notice:

STAFF & GOVERNORS

Version 2.5, November 2026

Royal Conservatoire of Scotland

RCS PRIVACY NOTICE: STAFF & GOVERNORS

As a member of staff at the Royal Conservatoire of Scotland (RCS), your privacy is important to us. This privacy notice applies to all RCS applicants to employment, employees and governors. We provide it to comply with data protection law and to ensure that our handling of your personal data is transparent and lawful. This privacy notice aims to explain how we look after your data, why we process your data and how your data is used, stored and protected. This privacy notice will also advise you how to access your data, make changes and stay informed.

WHO WE ARE

The Royal Conservatoire of Scotland is a Higher Education Institution (HEI) and a performing arts venue based in Scotland.

RCS is the data controller. We will process your personal data under the provisions of the UK General Data Protection Regulation and all relevant data protection legislation. RCS is registered as a data controller with the Information Commissioner's Office: Registration Number: Z5590451.

Our Data Protection Officer can be contacted at dataprotection@rcs.ac.uk

HOW WE LOOK AFTER YOUR DATA

We will comply with all relevant data protection legislation which means your personal data will be:

1. Processed lawfully, fairly and in a transparent manner
2. Collected for specific, explicit and legitimate purposes
3. Adequate, relevant and limited to what is necessary
4. Accurate and up to date
5. Kept in a form which could identify individuals for no longer than is necessary and securely deleted thereafter
6. Processed in a manner that ensures appropriate security of the personal data

HOW WE COLLECT YOUR DATA

We collect personal information about employees through the application and recruitment process, either directly from you, or sometimes from an employment agency. We may sometimes collect additional information from third parties including former employers and Disclosure Scotland. We will collect, update and process further personal information during job-related activities throughout the course of your employment with us.

WHY WE PROCESS YOUR DATA

The RCS will process your personal data as your employer and to fulfil its responsibilities as a HEI in Scotland.

In particular, we will process your data under the following circumstances:

I. Where we need the data to fulfil our contract with you
II. Where we need to comply with a legal or statutory obligation

III. Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We will only use your personal information for the purposes for which we collected it. For any situation where we will be using your data for any further purpose, we will inform you of the additional processing.

WHAT DATA WE WILL PROCESS

We will collect personal information about you to fulfil the tasks and purposes outlined in this privacy notice. We will collect and process some or all of the following categories of personal information about you:

- Personal details including name, address, telephone number, email addresses
- Date of Birth
- Gender
- Emergency contact details & next of kin
- National insurance number
- Bank account details, payroll records and tax status information
- Salary, annual leave, pension and benefits information
- Recruitment information (including references and all other documentation gathered as part of the application process)
- Eligibility to work in the UK information
- Employment records (including job titles, positions held, dates and hours of work, professional update records)
- Disciplinary and performance information
- CCTV, kaba and IT network use information
- Other directorships/company positions/register of interest information

We may also collect and process certain “special category” data, such as:

- Information about your race, ethnicity, religion, sexual orientation
- Information about your health, including any medical, health & sickness records
- Information about criminal convictions
- Trade Union membership (via Payroll)

We may also use your personal information where we need to protect your vital interests (or someone else’s interests).

If we collect special category data about you, we will have additional safeguards and justification in place to allow us to process and store that data securely.

HOW YOUR DATA IS USED AND LAWFUL BASIS FOR PROCESSING

We use your data for a number of interdependent purposes, examples of which are given below. Each of these purposes has a lawful basis for using your data as follows:

Purpose 1: Recruitment	
Description of processing	When you apply for a job at the RCS, you will be asked to provide personal data either directly to us through your RCS application form, or via a third-party recruitment agency contracted by the RCS. Further personal data may be collected from you as you progress through the various recruitment stages of application, shortlisting and interview. Data collected will include contact details, references, employment checks, bank details, new starter health information, criminal records check, PVG, and qualification checks.
Lawful Basis	**Contract** Our HR department collects and manages your personal data during the recruitment phase as part of the contract you agreed to when applying for the position. **Legal Obligation** As part of your application, you will be asked to complete an equality, diversity & inclusion form which may contain special category personal data. We ask for this information and process it as part of our legal obligation under Equalities legislation. **Special Category Data:** Employment, social security and social protection law, and Substantial Public Interest.

Purpose 2: Employment Period	
Description of processing	As an RCS staff member, you will be given access to a self-service staff portal to update some of your personal data, manage your leave, and access your payroll information. During your employment, your personal data will be used by your managers and our HR department to manage your employment, such as providing occupational health support, access to employee assistance programs, job evaluation, career reviews, absence management, flexible working, family-friendly arrangements, reasonable adjustments, documenting disclosed disabilities and the support provided, parental entitlements, staff management, PVG scheme and disclosure, contract management including timesheets, disciplinary and complaint procedures, as well as training and education recording such as your attendance at staff development events, mandatory training and further study requests.
Lawful Basis	**Contract** Your staff record kept by the HR department will document your RCS staff journey. Your manager will process necessary personal

	data related to your role and day to day requirements. This processing is completed as part of your staff employment contract. **Consent** Our HR department will ask for consent to gather and process data, if additional health information is necessary to support your employment. This may include the completion of risk assessments and the provision of specialist support. This may include requesting medical information from external professionals, including GP reports. If necessary, they will ask for consent to share any of the returned information with your managers. **Legitimate Interests** We have a legitimate interest in processing your personal data for purposes such as sending staff surveys, inviting you to employee events and administering access to staff benefits. **Legal Obligation** We process limited personal data to fulfil our legal obligations relating to employment, such as right-to-work checks, PVG checks, and HESA returns. **Special Category Data:** Employment, social security and social protection law, Occupational health or social care, and Substantial Public Interest

Purpose 3: Payroll and Financial	
Description of processing	As an RCS staff member, you will be entitled to your contracted payment, pension and benefits. You may also enter into a contract administered by the RCS for additional employment schemes, such as the cycle-to-work scheme. You will be asked to provide banking information as part of the application phase and can update this information via the self-service portal. You may also complete financial forms such as travel claim forms, expense forms, timesheets, and medical benefit forms.
Lawful Basis	**Contract** We will process the necessary personal data to fulfil your payments, payroll and benefits and deductions as part of your employment contract.

	Legal Obligation We have a legal obligation to report employment payments, tax information, pensions and benefits.

Purpose 4: Health, Safety & Wellbeing	
Description of processing	All staff are required to provide Emergency Contact Information and complete health and safety training related to their specific role and responsibilities. Your information may also be used in risk assessments, personal emergency evacuation plans, display screen equipment self-assessment and equipment issue records. Special category data, typically health data, may be necessary to provide additional employment support such as specialist equipment, translation services and medical or mental health support or assessment. Additional personal data processing may occur to prevent, handle, investigate, or implement risk reduction actions related to specific health and safety incidents. Where a COSHH (hazardous substances) or risk assessment has identified the legal obligation for medical and /or health monitoring, the health and safety department and/or your manager will inform you why this is necessary and what personal data is required.
Lawful Basis	**Legal Obligation** The RCS has a legal obligation to ensure the health and safety of all individuals, including our staff. This legal obligation extends to the reporting of H&S inspections, staff training, risk assessments, COSHH Assessments, Personal Emergency Evacuation Plans (PEEP), display screen equipment self-assessment, medical monitoring, health surveillance, and accident/first aid and RIDDOR reporting (including sharing information when required by law with the Health and Safety Executive). **Vital Interests** Personal data may be processed in a limited scope using the lawful basis of Vital Interest; this only applies to matters of life and death. **Recognised Legitimate Interests**

	When responding to or dealing with an emergency situation to protect the physical, mental or emotional well-being of people who need extra support or to protect them from harm or neglect. **Special Category Data:** Substantial public interest, Vital interests and Recognised Legitimate interests

Purpose 5: Staff Systems and Supports	
Description of processing	To support your work within the RCS, your personal data will be processed to provide you with access to necessary RCS services, such as the distribution of licensed/owned software and hardware, authentication services to access systems, access to the RCS library, complimentary RCS tickets, service support helpdesk tickets and employment assistance programme.
Lawful Basis	**Contract** As part of our contract, we are required to provide the necessary equipment and services to allow you to do your job. We also offer you certain benefits and services, such as access to the RCS library.

Purpose 6: Post Employment	
Description of processing	When you leave the RCS, your staff record will be updated, and your personal data will be used to manage the exit process, including exit interviews/questionnaires, the return of RCS equipment, and to provide you with limited post-employment support, and if requested, provide limited employment reference requests. The personal data held in your staff record may be used to support you should you choose to return to the RCS employ.
Lawful Basis	**Contract** Your personal data will be used by our HR department to complete our employment contract with you and any further employment requirements such as issuing of P45. Records of termination are kept for the year of termination plus six years. **Legitimate Interest** Any personal data given and processed in requested exit questionnaires and/or interviews and post-employment reference requests are processed under the lawful basis of legitimate interest.

Purpose 7: Governors	
Description of processing	Recruitment and selection for the Board of Governors will be carried out in line with processing activities listed above. If appointed, we will use your personal data to facilitate Board members in carrying out their roles and responsibilities as set out in the relevant legislation. This includes compliance with safeguarding obligations, annual reporting and publication requirements.
Lawful Basis	**Contract & Public Task** Your personal data will be used by RCS to complete your contract as governor. **Legal Obligation** • We will publish on our website some of your personal data to fulfil our public task role and/or legal requirement, including the publication of the register of interests. • Limited personal data that we are legally obliged to provide will be shared with Companies House and the Scottish Charity Regulator (OSCR) and published on their websites. • Limited personal data that we are legally obliged to provide will be shared with RCS banks and other financial and/or insurance services as part of their 'Know Your Customer' compliance regulations.

IF YOU DO NOT PROVIDE US WITH PERSONAL INFORMATION

If you do not provide us with the personal information we ask for, we may not be able to perform all or part of the contract we have entered into with you (for example paying you or providing you with a benefit).

For members of the Board of Governors - if you do not provide personal data that is required for a lawful purpose or to fulfil our public task, we may be prevented from complying with our legal obligations and may not be able to appoint you to the Board of Governors.

It is also important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your employment with us.

PROTECTING YOUR PERSONAL INFORMATION

We have in place appropriate security measures to prevent your personal data from being accidently lost, used, accessed, altered or disclosed in an unauthorised way. We limit access to your personal information to those employees and third parties who have a business need to have access. This applies equally to paper and electronic records. We have in place procedures to deal with any security breaches

and will notify you and the regulator of any suspected breach where we are legally required to do so. Further information can be found in our Data Protection Policy.

DATA SHARING
We may share your personal data with approved third parties. For example:

- Disclosure Scotland
- Occupational Health Providers
- Pension Providers
- External / Internal Auditors
- HMRC
- Insurers
- Scottish Funding Council
- Employee Benefit Providers

NB. This list is not exhaustive

All our third-party service providers are required to afford you the same level of personal information data security as the RCS. These third parties will only process your information at our instruction, with a valid lawful basis and that processing will be limited to the agreed specified purposes. Every year we will send some of the data we hold about you to the Higher Education Statistics Agency (HESA). This data collection includes special category data. HESA data collection notice.

HOW LONG WILL WE HOLD YOUR PERSONAL INFORMATION
We will only retain your personal information for as long as it is necessary to fulfil the purposes we collected it for, and to fulfil any legal, financial, accounting or reporting requirements.

Your personal data will form part of your permanent staff record if you are successful, or it will be deleted following the RCS records retention schedule if you are unsuccessful. The RCS Record Retention Schedule can be found on the Staff Portal.

YOUR RIGHTS
You have a range of rights under data protection legislation. You have the right to:

- **Be informed:** about the collection and use of your data via this Privacy Notice
- **Access:** your personal information (commonly known as a "subject access request")
- **Rectification:** if information we hold about you is wrong, please ask us to correct it
- **Restrict Processing:** you have the right to ask us to restrict or suppress the processing of your information

The following rights apply only in certain circumstances:

- **Object:** to our processing where we rely on a legitimate interest (or those of a third party) and you object

- **Erasure:** you can ask us to delete information about you
- **Data portability:** allows you to move, copy or transfer your data easily from one IT environment to another

Please note that you also have rights regarding automated decision making and profiling, however, RCS does not make any use of any automated decision making or profiling tools. If this changes, we will let you know.

CONTACT US

Please get in touch with us if you have any questions about any aspect of this Privacy Notice, and in particular if you would like to exercise any of your rights as outlined above.

We can be contacted at:

Data Protection Team

Royal Conservatoire of Scotland,

100 Renfrew Street, Glasgow, G2 3DB

dataprotection@rcs.ac.uk

COMPLAINTS

If you are not satisfied with the way in which your Data Protection request has been dealt with, you are entitled, in the first instance, to submit a complaint to us. Should you wish to complain, please contact us at dataprotection@rcs.ac.uk and we will, without undue delay, take appropriate steps to review and respond to your complaint.

If you are dissatisfied with our response, you have the right to complain directly to the Information Commissioner's Office via their website: https://ico.org.uk/make-a-complaint/