

Who we are?

George Watson's College ("The School") is managed by the Merchant Company Education Board, a registered Scottish Charity (SC009747).

The School's address is George Watson's College, Colinton Road, Edinburgh, EH10 5EG.

George Watson's College, as a Data Controller, is committed to protecting your personal information. In order to do this, it is important that we explain:

- What information do we collect about you?
- Why we collect this information?
- What we need from you?
- How do we collect that information?
- What we do with that information?
- Who do we share information with?
- How long do we keep your information?
- How can you access the information we hold on you?
- Where do we process and store your information?
- How do we protect your information?

What information do we collect about you?

The information we may collect during the recruitment process and throughout the course of your employment includes:

- Information about who you are – e.g. your name, date of birth, ethnicity, religion/faith and contact details
- Information about your emergency contacts – e.g. name, relationship, and contact numbers
- Your photo
- Details of salary and benefits (including fee remission), bank/building society, National Insurance and tax information
- Information on your nationality and immigration status
- A copy of your driving licence, if you drive as part of your employment
- Details of your pension, and all information necessary to administer your pension
- Information on your previous sickness and absence records (including sensitive personal information regarding your physical and/or mental health)
- Information regarding criminal records (including results of Disclosure Scotland checks)
- Details of your qualifications and professional memberships
- Information on grievances raised by or involving you, conduct issues involving you, your appraisals and performance reviews, and any performance management or improvement plans
- Information on your absences from work due to sickness, family leave (maternity, parental, adoption etc), special leave (dentist appointments etc)
- Information in applications you make for other positions within the School
- Information about your use of our IT, communication and other systems in accordance with our Information Security Policy
- Details of your use of social media (in line with our Social Media policy)
- Copies of references about you we give to others
- Any images of you which are processed by School CCTV systems.

Why do we collect this information?

This information allows us to enter into and implement your employment contract, including paying you and managing your pension contributions/benefits as required. It is also good employment practice.

What do we need from you?

We collect information from you as part of the recruitment process, and will ask for further details when you have been offered a position, and when you start work. Throughout your time with us you may be asked for other information as legislation changes or your personal situation changes (e.g. if you have a child, get married or divorced, move house...)

How do we collect that information?

You provide us with much of the information we need in: your application form or CV, the anonymised diversity monitoring form, the health questionnaire, and your passport.

We may also collect information from any relevant professional bodies, pension administrators, health and occupational health professionals, Disclosure Scotland, and the Home Office.

For grievances, conduct or capability issues, disciplinary action, appraisals, performance reviews and management/improvement plans we will collect information from you, your line manager, other employees and any consultants we engage with, in relation to the relevant process.

Information on your use of our IT, communication and other systems will be gained from monitoring of our systems (e.g. websites, browser history, email, jabber, telephones, voicemail...) and CCTV in accordance with the Information Security Policy. Use of social media may be collected from the website and applications.

What do we do with that information?

We process your personal information to enable us to:

- maintain employment records and to comply with our legal, regulatory, governance and equal opportunities obligations, and ensure safe working practices
- monitor and manage staff access to our systems and facilities; to protect our networks, and the personal data of employees, pupils and customers against unauthorised access or data breach
- ensure adherence to our policies, such as those concerning security and system use
- ensure that commercially sensitive information is kept confidential
- carry out Disclosure Scotland checks and investigate complaints and allegations of criminal offences
- undertake or cooperate with investigations by regulatory bodies, or in connection with legal proceedings or requests
- investigate any alleged disciplinary issue, or any grievance raised by you or a colleague (including viewing any CCTV images if relevant).

Who do we share information with?

We will not share your personal information with any third-party unless required to meet regulations or legal requirements. These are likely to include: HMRC, Disclosure Scotland and other regulatory authorities, the Police, the Home Office, any relevant professional bodies (such as GTCS), our insurers, and pension administrators.

On occasion, we may need to share some personal information with external contractors or our professional advisers, where possible we will anonymise the information but this may not always be possible. However, the recipient of the information will be bound by confidentiality obligations.

If applicable to you, we will share limited personal details relating to you with the relevant software provider in order for you to take part in school sporting activities or other activities which utilise the SOCS system.

How long do we keep your information?

We keep your information throughout your time with us and for seven (7) years after your employment.

Please be aware that we may have to retain a minimal amount of personal data for legal, historical and statistical purposes. If there is a clear business reason for keeping personnel records for a longer period, we will consider whether the records can be anonymised.

How can you access the information we hold on you?

You have the right to access the personal information we hold on you. If you wish to receive a copy you may make a data subject access request to our Data Protection Officer, the Bursar.

We must confirm your identity before we can release any personal information.

If the personal information is inaccurate or incomplete, you can ask us to correct it. You can also ask for information to be deleted or removed if there is no compelling reason for George Watson's College to continue to hold it.

How do we process and store your information

The personal information collected by the School will be held in electronic and/or physical format on secured systems within the European Economic Area. We will not knowingly transfer your personal information outside of the European Economic Area. We only store physical copies of documents containing your personal information on the School's premises. Information that we store electronically is retained on systems owned and/or managed by the School.

Details regarding how we store and manage data can be found in our Data Storage and Retention Policy.

How do we protect your information?

This can be found in our Information Security policy.

How to Contact Us

If you have any questions, comments or requests regarding this Privacy Policy please contact:

The Bursar / Data Protection Officer
George Watson's College
Colinton Road
Edinburgh
EH10 5EG
or
dataprotection@gwc.org.uk
or
0131 446 6000

Complaints

If you are not satisfied with the way that we have handled any of your requests or questions relating to our use of your personal data then you can contact the Information Commissioner's Office at www.ico.org.uk/concerns or phone 0303 123 1113.

The Information Commissioner's Office is the statutory body responsible for overseeing data protection legislation and law in the United Kingdom.

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