



Data Protection Statement for Students

How we use your personal information

This statement explains how St Edmund's College (“we” and “our”) handles and uses information we collect about those applicants to whom we make an offer of study, and students once they join the College (“you” and “your”). In broad terms, we use your personal information to manage the ongoing relationship between the College and you as part of our lifelong community of scholars. This includes guiding and supporting your academic studies, maintaining and reviewing your academic progress and pastoral welfare, administering your financial commitments to the College and (if you live in College accommodation) managing our relationship with you as a resident.

When changes are made to this statement, we will publish the updated version on our website and notify you by other communications channels as we deem appropriate or necessary. This Data Protection Statement is reviewed regularly and updated where necessary to reflect changes to the College's processing activities, including where personal data is used for a new or materially different purpose.

The controller for your personal information is St Edmund's College, Mount Pleasant, Cambridge CB3 0BN. The Data Protection Officer for the College is Intercollegiate Services Limited (ISL) (64 Bridge Street, Cambridge CB2 1UR; 01223 768745; dpo@isl.colleges.cam.ac.uk). ISL should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The person within the College with overall responsibility for the protection of information is the Senior Information Risk Owner, who at the time of issue is the Bursar. The Bursar can be contacted at bursar@st-edmunds.cam.ac.uk. Day-to-day responsibility for monitoring compliance with relevant legislation and dealing with concerns relating to the College's data protection arrangements sits with the College Data Protection Lead, who at the time of issue is the Governance, Risk & Compliance Manager. The Governance, Risk & Compliance Manager is the primary contact for all data protection matters and can be contacted at grcm@st-edmunds.cam.ac.uk. This is also the address to use if you wish to exercise any of your data protection rights, including requesting copies of personal data the College holds about you, or making a complaint about how the College has managed your personal data.

The normal legal basis for processing your personal information is that it is necessary for the performance of one or more contracts with us (including preparing to become a student and member of the College, the expectations on both sides during your course of studies and any related accommodation contract). We have commitments to other external bodies (particularly the University of Cambridge) as part of those contracts, and we outline below (see “How we share your personal information”) how and when we ordinarily will share your personal information. For some specific purposes, we may rely on another legal basis, including where processing is necessary for compliance with a legal obligation (e.g. financial records, equal opportunities monitoring), or where we believe it is in our legitimate interest to do so (e.g. to enable your access to external services). In some cases, we may also process personal information where this is necessary for the performance of tasks carried out in the public interest or in the exercise of official authority, or to protect vital interests. Where we process special category data, such as health, disability, ethnicity, religious belief or other equality information, we will also identify an appropriate condition under Article 9 UK GDPR. Where we process criminal offence data, including information

relating to criminal records, allegations, investigations or related security measures, we will do so only where authorised by law and subject to appropriate safeguards. You may ask us for further information on these matters at any time if you have specific concerns.

How your data is used by the College

We collect and process your personal information, as specified below, for a number of purposes, including:

- A. maintaining your personal details, including ensuring effective communications with you;
- B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere;
- C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere;
- D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing;
- E. maintaining financial records relating to your studies, your funding and other financial support arrangements;
- F. provision of references to third parties;
- G. maintaining a record of your behaviour and in particular where there have been concerns or complaints raised about you;
- H. maintaining a record of any complaints you make to the College and their outcomes;
- I. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, please contact us at the address given below, or speak to the Senior Tutor (tutorial@st-edmunds.cam.ac.uk).

We also operate CCTV and Automatic Number Plate Recognition (ANPR) on our sites. These may capture images of individuals and, in the case of ANPR, vehicle registration marks. CCTV and ANPR are used for purposes including safety and security, crime prevention and detection, protection of College buildings, assets and information, management of emergencies and incidents, health and safety, and parking management and enforcement. Routine CCTV and ANPR recordings are normally retained for no more than 30 days, unless they are required in connection with an incident, investigation, legal claim or other lawful purpose. Our CCTV and ANPR policy can be viewed at www.st-edmunds.cam.ac.uk/data-protection.

Please note that if you engage with us for any other purpose (e.g. you work for us, or volunteer for us), there may be additional data protection statements that you will be provided with for those other purposes, usually at the first point of engagement.

How long we keep your information for

The Annex outlines specific retention periods for certain categories of information: most of these are determined by legal requirements relating to that specific information.

Where no specific retention period is noted, when your relationship with the College ends, including on graduation or other departure, the College reduces your personal information to a subset of information so that the College can retain a sufficient record of your academic achievements for references and other related purposes, and your time at the College. The archived record would retain:

- (i) your current name and any previous names you have had;
- (ii) unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- (iii) your current and previous contact details;
- (iv) your application details, our assessment of your application and the details of any offer(s) of study we have made;
- (v) academic records for which the College is responsible;
- (vi) matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
- (vii) other details of your academic progress or achievements (e.g. College or University awards or prizes);
- (viii) details of your significant involvement with the Combination Room, or with College affairs, societies and clubs.

The College may retain personal information for longer than the periods stated in this statement where this is necessary and lawful, for example in connection with a complaint, investigation, fitness to study or disciplinary process, safeguarding matter, insurance claim, legal claim, regulatory enquiry or other lawful purpose. Any such retention will be kept under review and limited to what is necessary.

Finally, we strongly encourage all of our students to remain in touch with the College after they leave and, for that reason, we transfer a subset of this information to our Development and Alumni Office. You are encouraged to read our separate statement about personal information for alumni, which covers your ongoing lifelong membership of the College and explains how alumni and supporter information is used after you leave the College. See www.st-edmunds.cam.ac.uk/data-protection/dps/alumni .

How we share your personal information

Within the College

We share your information with relevant people within the College to enable the College to perform its contractual and legal obligations, and to ensure that we are able to provide you with the required level of service and support, including making appropriate provisions for your health and wellbeing. Your information will only be shared within the College to the extent considered necessary to perform these functions and on a need-to-know basis. If you have any concerns around the extent to which your personal information will be shared within the College then you can contact either the Senior Tutor or the College Data Protection Lead.

The College also takes photographs of its students, either individually and/or as a group annually, and at graduations. These may be used within the College for identification, community, ceremonial, archival and

related College purposes, and may be displayed within the College or used in College materials where this is appropriate and lawful. Where consent is required for a particular use, we will seek it separately.

With the University

By being a member of a College and registering for a course of study, you are automatically a member of the University of Cambridge. The academic and student support arrangements between the College and the University of Cambridge are complex and varied depending on your course and level of study. Information relating to you (and particularly your academic studies) is shared routinely and often with the University, and the University and its partners (including the College) have a data sharing protocol to govern such interactions and information transfers in both directions, as well as a shared student record system and database.

The personal information shared with the University will include only that which is necessary for you to undertake and complete your studies and your examinations, and in addition will include any information necessary for the College to fulfil its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the Colleges and the University). Where possible, the College will notify you of its intention to share such data in advance.

The University is a separate legal entity to the College and has its own statement about your personal information and its procedures. It in turn shares information with the affiliated student unions and a number of other bodies for statutory and other purposes.

With other organisations

The College routinely shares information with, and receives information from, where appropriate:

- Cambridge City Council and other local authorities (to provide evidence of any rights to or exemptions from local services and taxes, including electoral registration and council tax);
- your funding providers or sponsors, as agreed with them and/or you, including the Student Loans Company; and
- the Universities and Colleges Admissions Service.

We may also be subject to a legal requirement (with or without your consent) to share your personal information with some government agencies under special circumstances (e.g. relating to crime or health and safety), such as the police or security services or other statutory authorities with investigatory powers. Where possible, the College will notify you of its intention to share such information in advance.

We will normally provide confirmation of your qualifications and other academic references to a prospective employer or financial sponsor if you have requested us to do so or if it is reasonably clear that it would be in your interests for us to do so, and we have made reasonable checks to ensure the information is being requested for that purpose.

We may also provide personal information to agencies and trusted advisers in order to receive professional advice or guidance in relation to a number of matters (examples of such advice include legal and audit services, fee status verification services, intercollegiate agreement services) or to provide services to you through a third party on our behalf. In such circumstances, appropriate data sharing, data

processing or contractual arrangements will be in place, where required, to ensure your personal information is not retained by them for longer than necessary or otherwise shared more widely.

The College may share information with organisations overseas as part of arrangements related to your membership of the College (e.g. an overseas funding provider). In most cases, this will be related to the operation of a contract. Where personal information is transferred outside the UK and the UK GDPR transfer rules apply, the College will ensure that an appropriate transfer mechanism and any required safeguards are in place.

Publication of your personal information

We would not normally make your personal information publicly available without your consent or another lawful basis.

We encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

Please also note that the University's people search function (at <https://www.lookup.cam.ac.uk/self>) is, by default, accessible to members of the University and Colleges. You may be able to change your settings so that your details are accessible more widely, including to the general public. We refer to this service because it helps build community relations and networks and helps others get in touch with you easily.

Your rights

You have the right: to ask us for access to, rectification or erasure of your personal information; to restrict processing (pending correction or deletion); to object to processing in certain circumstances, including direct marketing communications; and to ask for the transfer of your personal information electronically to a third party (data portability).

Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them where the law allows us to do so.

If you have questions or concerns about your personal information, or how it is used, please speak to the relevant College staff in the first instance. If you need further guidance, please contact the Senior Tutor or the College Data Protection Lead using the details given above.

Complaints

If you are concerned about how the College has handled your personal data, you may raise this with the College Data Protection Lead, the SIRO or the DPO using the contact details above. The College will consider data protection complaints fairly and proportionately, and will normally acknowledge receipt within 30 days.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commission at <https://ico.org.uk/concerns>

Annex

We collect and process your personal information, as specified below, for a number of purposes, including:

A. Maintaining your personal details, including ensuring effective communications with you;

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- (i) your current name and any previous names you have had;
- (ii) unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- (iii) your current and previous contact details;
- (iv) next-of-kin or emergency contacts.
- (v) You should make your next-of-kin or emergency contact aware that you have provided their details to us for this purpose.

B. Maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- (i) your application details, our assessment of your application and the details of any offer(s) of study we have made;
- (ii) academic records for which the College is responsible;
- (iii) matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
- (iv) other details of your academic progress or achievements (e.g. College or University awards or prizes). Where an award or prize is provided by an external sponsor, we will normally share relevant details about you and your academic performance with them.

C. Maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- (i) records of your membership of College committees, the Combination Room, and College clubs and societies;
- (ii) awards, prizes and achievements in College or University-related activities (e.g. music, arts, sports etc.).

D. Maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- (i) details of any disability, illness, and any consequent learning support, social support or other support needs;
- (ii) details of any serious risks affecting you (e.g. severe allergies);
- (iii) arrangements agreed with you to manage your use of College and University facilities (e.g. computing services, sports facilities, libraries, accommodation, learning spaces), including any special requirements that may be linked to your health or religious beliefs;
- (iv) other information to support your health, safety and wellbeing.

This information may include special category data, including health, disability or religious belief information. It will be handled subject to additional safeguards and shared only where necessary and lawful. We may also retain copies of statements from professional medical advisers, provided either by you or directly to us.

All personal information will be managed in line with our Data Protection Policy and relevant confidentiality arrangements. We recognise that much of the personal information outlined above is of a sensitive nature and requires a high level of discretion. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others where this is necessary and lawful, including in relation to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

Please note that where you are referred to services not offered directly by the College (e.g. the University Counselling Centre and the University's Disability Resource Centre), these support services will have their own data protection statement (or privacy notice) and we advise you to pay close attention to these.

E. Maintaining financial records relating to your studies, your funding and other financial support arrangements:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- (i) records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges, as well as what monies are to be, and have been, collected by the College on behalf of itself and the University;
- (ii) records of any financial support agreed by the University and/or the College (studentships or awards, additional discretionary funding, benefits or waivers approved by the College);
- (iii) where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);
- (iv) where appropriate, your banking details in order to conduct financial transactions, and records of such transactions;

- (v) records of your College financial account, including balance and transactions;
- (vi) copies of any correspondence with you about any of the above matters.

Where this information includes the personal information of others (e.g. parental income evidence), you should ensure that they are aware that you have provided their information to us for these purposes. This information is normally retained until seven years after you complete your studies.

F. Provision of references to third parties:

In addition to the information above (and particularly your achievements in B and C above), we retain personal information (provided by you or created by us), including:

- (i) records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support.

G. Maintaining a record of your behaviour and in particular where there have been concerns or complaints raised about you:

We retain personal information (provided by you or by others, or created by us), including:

- (i) details of any investigations undertaken by the College into your conduct or behaviour (e.g. disciplinary investigations, fitness to study investigations, complaints made against you);
- (ii) a record, including the final outcome, of any investigation by the University into your conduct or behaviour.

The College has several complaints procedures, relating to different matters, which you are expected to familiarise yourself with and, in all cases, personal information will be managed in line with our Data Protection Policy and relevant confidentiality arrangements. We recognise that investigations may include information or statements of either a sensitive or disputed nature, and that such records require a high level of confidentiality. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others where this is necessary and lawful, including in relation to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

H. Maintaining a record of any complaints you make to the College and their outcomes:

We retain personal information (provided by you or by others, or created by us), including:

- (i) details of any complaints you have made to the College and their outcomes, where these have been taken through the College complaints procedure.

This information is normally retained until three years after you complete your studies.

I. Maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

It is difficult to provide a comprehensive list, but we retain personal information (provided by you), including:

- (i) information relating to “equal opportunities” (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfil legal requirements of the College or the University;
- (ii) information relating to known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- (iii) information relating to your rights to live, work and study in the United Kingdom;
- (iv) any criminal record that may affect your status as a student of the University or the College.

Some of the information listed above may include special category data or criminal offence data. Where this is the case, the College will identify an appropriate lawful basis and additional condition under data protection law, and will handle the information subject to appropriate safeguards.

If you have concerns or queries about any of these purposes, please contact us, or speak to the Senior Tutor.