



Data Protection Statement of Sidney Sussex College: Offer Holders and Students

This statement explains how Sidney Sussex College handles and uses information we collect about those applicants to whom we make an offer of study, while that offer stands or until, until, having matriculated, they leave the University Register having completed their course of studies or for other reasons.¹ 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, reviewing your financial commitments to the College and (if you live in College accommodation) managing our relationship with you as party to an Occupancy Agreement.

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.

The Data Controller for your personal information is Sidney Sussex College, Cambridge CB2 3HU. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd [12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk]: OIS Ltd. 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 otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the College Data Protection Lead. All correspondence relating to this Data Protection Statement must be addressed to the College Data Protection Lead, Sidney Sussex College, Cambridge CB2 3HU or DataProtection@sid.cam.ac.uk.

The normal legal basis for processing your personal information is that it is necessary in 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 ordinarily share your personal information (see "*How we share your personal information*"). For some specific purposes, we may rely on another legal basis for sharing your personal data: this may be the case when we are required to do so for compliance with a legal obligation (e.g. financial records, equal opportunities monitoring), or when we believe that it is in our legitimate interest to do so (e.g. to enable your access to external services). You may ask us for further information on these matters at any time if you have specific concerns.

How your information is used by the College

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

- maintaining your personal details, including ensuring effective communications with you;

¹ In the rest of this document, "the College", "we" and "our" refer to Sidney Sussex College; and "you" and "yours" refers to the students and offer holders of the College.

- maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere;
- maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere
- 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;
- maintaining financial records relating to your studies, your funding and other financial support arrangements; provision of references to third parties;
- maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
- maintaining a record of any complaints you make to the College and their outcomes;
- 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 the relevant Head of Department, or College Data Protection Lead, or speak under pastoral confidentiality to any member of the College's Pastoral Team, whose work contact details are published on the College website.²

We also operate CCTV on our properties, which will capture footage. The operation of CCTV by the College is regulated by a Policy, published on the College's website.³

Please note that if you engage with us for another specific purpose (e.g. you work for us, or volunteer for us), a different Data Protection Statement may apply. All Data Protection Statements are published on the College's website.⁴

How long we keep your information for

For ease of reference, an Annex to this document outlines specific retention periods for certain categories of information: most of these are determined by legal requirements relating to that specific information. Further information is available within the College's Data Retention Schedule, which is published on its website.⁵

Finally, we strongly encourage all of our students to remain in touch with the College after they leave and, for that reason, a subset of your personal information is also held directly by the College's Development and Membership Office, whose Data Protection Statement for Alumni and Supporters (also published on the website⁶) covers your ongoing lifelong membership of the College.

How we share your personal information

Within the College

² <https://www.sid.cam.ac.uk/people/college-departments-and-staff>

³ <https://www.sid.cam.ac.uk/about-sidney/published-information/data-protection-and-freedom-information>

⁴ <https://www.sid.cam.ac.uk/about-sidney/published-information/data-protection-and-freedom-information>

⁵ <https://www.sid.cam.ac.uk/about-sidney/published-information/data-protection-and-freedom-information>

⁶ <https://www.sid.cam.ac.uk/about-sidney/published-information/data-protection-and-freedom-information>

In order that the College may operate smoothly, we share some or all of the following personal information with relevant people across different departments within the College. This is typically by means of a) a Student Booklet issued to all student-facing departments at the start of the academic year, and b) by role-tailored permissions granted to individuals having access to student information systems (CamCORS, CamSIS):

- Portrait photograph from your UCAS form
- First, preferred, and family name
- College contact details
- Home contact details
- Enrolment
- Academic information (Course Enrolment, Transcript, feedback by supervisors and Directors of Studies on your academic progress)
- Digital correspondence between you and the College, and about you with third parties, when necessary for the purposes of University processes (e.g. seeking an Allowance on medical grounds)
- Funding information
- Financial details necessary for receiving/making payment from or on behalf of/to you
- Additionally, the College Nurse holds medical information, and Tutors and members of the Tutorial and Pastoral team may also hold confidential records of their engagements with you.

As well as satisfying the requirement of data protection law for the processing of personal data and sensitive personal data, all such information is held in accordance with University guidance on “Confidentiality in a Pastoral Context”, which is published on the University’s website.⁷

We are required to collect information from offer holders and students to verify the information that has been self-declared within an application. This may include taking copies of examination certifications and identification documentation and holding this in line with the College’s Data Retention Schedule. We may use carefully selected third party service providers to collect and store this information, and to share information with our offer holders and students. Information about third party service providers, including their own privacy policies, can be found at:

Moodle: <https://www.student-systems.admin.cam.ac.uk/moodle/legal>

You can request a greater level of privacy by contacting the College Data Protection Lead.

The College also takes photographs of its students, either individually and/or as a group in a matriculation and graduation photographs. These are widely used within the College and may be on public display.

Otherwise, the College restricts the sharing of your personal information within the College

⁷ <https://www.seniortutors.admin.cam.ac.uk/university-guidance-and-procedures/confidentiality>

in line with its confidentiality policy.⁸

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 agreement 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. In addition, it 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, which you can view at: www.information-compliance.admin.cam.ac.uk/data-protection/student-data. It in turns 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:

- the 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;
- Universities and Colleges Admissions Service (in relation to your application, offer and requirements to meet any offer of study)

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 reference to a third party (typically a prospective employer, or financial sponsor) only if it is clear that it would be in your interest for the College to do so. To expedite this process, we strongly encourage you to inform the college in advance that it may be contacted by the third party

⁸ <https://www.sid.cam.ac.uk/about-sidney/published-information/data-protection-and-freedom-information>

in question with such a request.

The College as Data Controller may share your personal data with third parties which are in a contractual relationship with the College as “Data Processors”, 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. A Data Processor may not process personal information other than on behalf of the Data Controller. The relationship between the College, and each Data Processor, is regulated by a Data Processing Agreement, which ensures compliance with data protection law. Any such sharing of personal information will require your explicit written consent.

The College may share information with organisations overseas as part of arrangements related to your membership of the College (e.g. field trip, student exchange programme, an overseas funding provider). In most cases, this will be related to the operation of a contract.

Publication of your personal information

We would not normally make your personal information publicly available without your consent. We strongly encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

Please also note the default setting of the University’s website “people search” function⁹ gives access to all members of the University and all Colleges: we share this because we believe it helps significantly in building community relations and networks and helps others get in touch with you easily. You may alter this setting to make your contact details accessible to the general public by visiting www.lookup.cam.ac.uk/self.

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 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.

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

If you remain unhappy with the way your information is being handled, or with the response received from us, you retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner’s Office at <https://ico.org.uk/concerns/>

Date: May 2018
Author: College Data Protection Lead

⁹ <http://www.cam.ac.uk/email-and-phone-search>

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 (eg student number, CRSID, date of birth, photograph);
- iii) your current and previous contact details;
- iv) next-of-kin or emergency contacts.

We will assume that you have obtained permission from your next-of-kin or emergency contact for us to hold their information for that 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) records of your academic provision from the College (including supervisions, College examinations and other academic support);
- 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, or by the college with funds provided by a donor, we will normally share details about you and your academic performance with that sponsor or donor. Awards and Prizes are also normally reported in College publications (e.g. the Annual, Pheon).

- 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 Junior Common Room (JCR), Middle Common Room (MCR) and College clubs and societies;
- ii) awards, prizes and achievements in College or University-related activities (eg 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.

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 confidentiality policy. 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 in matters relating to significant risks to your health and safety or the health and safety of others.

Please see our retention policy for further information.

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 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 (e.g. [kitchen fixed charge]), 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 (including Cambridge Bursaries, other 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), we will assume that you have their permission to provide it to us for our 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:

G. records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support maintaining a record of your behaviour and in particular where there has 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 of 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 confidentiality policy. 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 in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained for at least one year after you complete your studies and no longer than two years since you ceased to be on the University's Student Register.

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 for at least three years and no longer than four years since you ceased to be on the University Student Register.

I. other purposes:

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

- i) other information sets;

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

- J. 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” (eg 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;
- v) If you have questions or concerns about your personal information, or how it used, please speak to the relevant College staff in the first instance. If you need further guidance, please contact the College Data Protection Lead, using the details given above.