

## **St John's College, Cambridge, Data Protection Statement: The Master and current Fellows**

This statement explains how St John's College, Cambridge handles and uses personal information we collect about those elected to Fellowships or to the office of Master in the College. We use 'you' and 'your' to refer to people in these categories.

'Personal information' means any information which relates to or identifies you as an individual.

We use your personal information to manage the ongoing relationship between the College, and you as someone belonging to our community of scholars, living in Cambridge. This relationship requires us to guide, support and develop your academic pursuits, maintain and review our financial obligations to you, review your financial commitments to the College and (if you live in College accommodation) manage 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 communication channels as we deem appropriate or necessary.

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 data, is the Head of Information Services and Systems, DPO@joh.cam.ac.uk.

The legal basis for processing your personal information is that this is necessary in the performance of one or more contracts or agreements with us, including preparing to become a Fellow and member of the College, if you are not one already. It is also necessary to facilitate and clarify the expectations on both sides during your performance of any obligations or commitments you undertake that qualify you to hold your Fellowship. We have commitments to other external bodies, particularly the University of Cambridge, as part of those contracts, and we outline below how and when we ordinarily will share your personal information. For some specific purposes, we may rely on another legal basis, for example compliance with a legal obligation, as in respect of financial record keeping, and equal opportunities monitoring, or where we believe it is in our legitimate interest to do so.

### **How your information is used by the College**

We collect and process your personal information, as specified below:

1. maintaining basic biographical and contact details;
2. maintaining a formal record of your academic research, teaching, service and achievements while a member of the Fellowship or as Master of the College;
3. 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 time as Master or Fellow, as well as information about your health and wellbeing;
4. maintaining financial records relating to your salary and/or emoluments, your College accommodation, grants awarded you from the College in line with our Statutes and Standing

Orders, your College bill, your participation in the College's health insurance arrangements for Fellows, and participation in the College's House Purchase Scheme;

5. maintaining a record of your lunching and dining privileges, and high table bookings, in order to comply with our current Standing Orders;
6. processing references provided at your request by officers of the College and other line managers to third parties;
7. maintaining a record of any complaints you make to the College and their outcomes, and of any complaints made to the College about you;
8. maintaining data to enable the College and the University to produce statistics and further research for internal and statutory reporting purposes.

Further details are provided in the Annex below.

We also operate CCTV on our main College site, which will capture footage, and a door security system which records entrances and exits through some doors on the main site. Our data protection statement on CCTV and door security can be viewed at <https://www.joh.cam.ac.uk/data-protection-information>.

Please note that if you engage with the College for any other purpose, additional data protection statements may be copied to you for those purposes, usually at the first point of engagement.

### **How long do we keep your information?**

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, within four years of your leaving the Fellowship, the College reduces your personal information to a subset so that the College can retain a sufficient record of your career and academic achievements, and of your time at and association with the College. The archived record would normally include:

- names, addresses, date of birth, year of admission to the College, years of your Fellowship and/or Mastership, schools attended, subjects, dates and classes of degrees, College accommodation or room occupancy while a Fellow, participation in sports and societies, details of immediate family as provided by you at admission and afterwards, details of academic awards and prizes, publications and other achievements that you have told us about or which appear in published University and College sources.

We encourage all our former Fellows to remain in touch with the College after they leave and, for that reason and in order to pursue the College's legitimate interests in promoting and understanding the historical composition and interests of our Fellowship, we process this retained information in our Development Office and Biographical Office, and continue to develop these records in respect of family and career details as you supply them to us, and as we learn about them from media announcements, published information and other validated sources. You are encouraged to read **our separate statements about personal information for alumni**, which covers your lifelong membership of the College.

### **How we share your personal information**

*Within the College*

We share the following information selectively with relevant people employed by the College: names, subjects, age, year in course, accommodation in the College or in College property, dietary preferences, financial circumstances as declared by you, College payments and grants received with the date of receipt, emergency contacts as declared by you, disabilities as declared by you. This sharing is considered necessary for the College to operate smoothly, but you can request a greater level of privacy by contacting the Head of Information Services and Systems.

With a sitter's consent, the College also takes or commissions photographs, and on occasion paintings and drawings of its Master and Fellows, either individually and/or as groups. These are widely used within the College and may be on public display.

#### *With the University*

As Master or a Fellow of the College, you are automatically a member of the University of Cambridge. The academic arrangements between the College and the University of Cambridge are complex and vary depending on the nature of your office and your employment or retention by one or both these parties. Information relating to you, and particularly your academic, professional and research achievements, is shared routinely with the University, in order to capture details essential for internal and academic evaluation exercises, and to illustrate the range of teaching and research undertaken in Cambridge.

The personal information shared with the University will include that which is immediately relevant to your teaching or research, alongside any information necessary for the College to fulfill its obligations and agreements with the University.

The University is a separate legal entity to the College **and has its own statements about your personal information and its procedures.**

#### *With other organisations*

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

- 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;
- Insurance companies in respect of room and bicycle insurance, with your agreement, or when a Fellow is likely to make a claim on the College insurance;
- Heffers of Cambridge, if you have chosen to participate in their discount scheme;
- HMRC for RTI compliance, and annually for P11d/P60 purposes;
- Pension providers, to allocate contributions correctly and to confirm entitlement for pension;
- Barclaycard, for communications and security purposes in connection with applications for a College credit card.

We may also be subject to a legal requirement to share your personal information with some government agencies under special circumstances, for example 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 asked us to do so, or otherwise if it is reasonably clear that it would be in your interests 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, for example legal and audit services and intercollegiate agreement services, or to provide services to you through a third party on our behalf. In such circumstances, data sharing agreements are in place 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, for example with an overseas funding provider, as part of arrangements related to your membership of the College. 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.

## **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 is used, please speak to the relevant member of College staff or Head of Department in the first instance. If you need further guidance, please contact the Head of Information Services and Systems 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 have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

*Last updated: January 2018*

## Annex

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

- A. maintaining biographical and contact details. 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;
  - ii) unique personal identifiers (for example CRSID, date of birth, photographs);
  - 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 and emergency contacts for us to hold their information for this purpose.

- B. maintaining a record of your academic research, appointments, offices, service and achievements at the College, the University of Cambridge and elsewhere, and managing aspects of your social engagement with the College. We retain personal information, provided by you or by the University of Cambridge, or created by us, including:
- i) your application details where appropriate, your CV, our assessment of your application and the details of any offer we have made;
  - ii) records of the academic support you give the College, including supervisions, admissions interviews, setting College examinations;
  - iii) records of your academic qualifications, including those prior to becoming a member of the College;
  - iv) other details of your academic progress or achievements, for example research activities, offices and appointments, Titles of Fellowship, College or University awards or prizes;
  - v) records of applications for research or other leave;
  - v) records of your membership of the Council or College committees, and College clubs and societies;
  - vi) awards, prizes and achievements in College or University-related activities;
  - vii) responses to invitations issued by the College, for the purposes of arranging seating plans, identifying those with particular dietary needs, and booking spaces for events.

Where an award or prize is provided by an external sponsor, we will normally share details about you with them. Detailed applications for leave are retained by the Senior Tutor's Office for ten years. Records relating to event invitations are normally retained by the Steward's Secretary for up to five years.

- C. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life, including support needs that are, or have

been, provided by the College or the University. We retain personal information, provided by you or by the University of Cambridge, or created by us, including:

- i) details of and records relating to any disability, illness, and any consequent academic support, social support or other support needs;
- ii) details of consultations with Health Centre staff;
- iii) details of any serious risks affecting you;
- iv) arrangements agreed with you to manage your use of College and University facilities, for example computing services, sports facilities, library privileges, accommodation, learning spaces, and any special requirements that may be linked to your health or religious beliefs, including personal evacuation plans;
- v) details of your College gym registration;
- vi) details of any accident or injury sustained by you while on College premises, and our response;
- vii) records of car registration, motorcycle and bicycle registration and safe storage details;
- viii) records of pastoral care provided by the Chaplain.

We may also retain copies of statements from professional medical advisers, provided either by you or directly to us.

This information is normally retained during your Fellowship/Mastership, and then for up to four years after you leave the Fellowship/Mastership. Some Health Centre records are held for six years, but a diary recording consultations is retained for ten years. Records of pastoral care are retained by the Chaplain for one year after the consultation. Personal evacuation plans are deleted when you leave the College.

Please note that where you are referred to services not offered directly by the College, for example the University Counselling Centre or Disability Resource Centre, **these support services will have their own data protection statements or privacy notices.**

D. maintaining records of what we owe and pay to you in performance of our contractual agreements with you, and in the form of grants to Fellows under the Standing Orders of the College, including details of:

- i) stipends and salaries; bank details; National Insurance numbers; tax codes; payments for supervisions and for acting as Tutor, Director of Studies, interviewer or examiner; other emoluments; expenses; grant claims and payments of grants in accordance with the Standing Orders; benefits; pension schemes; Court Orders; and participation in the Heffers discount scheme. Benefit records will sometimes include personal details of dependents and partners, and we assume that you have secured their consent to share this information with the College;
- ii) Payments to you under the House Purchase Scheme, the Scheme agreement with you, and records relating to the valuation of relevant property.

Most information under this heading is retained by the College for a minimum of seven years in accordance with our statutory and other legal obligations.

E. maintaining records of what you owe to us, in payment of your College bill or in respect of any other contractual agreement between us. 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, 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 or the University;
- ii) records of repayment of any financial support agreed by the University and/or the College;
- iii) records of any goods or services purchased from the College;
- iv) where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);
- v) payments made by you under the House Purchase Scheme;
- vi) where appropriate, your banking details in order to conduct financial transactions, and records of such transactions;
- vii) records of your College financial account, including balance and transactions;
- viii) copies of any correspondence about any of the above matters.

Where this information necessarily includes the personal information of others as supplied by you, we will assume that you have their permission to provide it to us for our purposes. This information is normally retained for seven years.

F. provision of references to third parties. In addition to the information above, we retain personal information on which references might draw, provided by you or created by us, including:

- i) records of performance reviews, correspondence with the Senior Tutor and/or other College Officers.

G. maintaining a record 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;
- 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. **The *Statutes and Standing Orders of the College and College Website* contain further details.** 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 we reserve the right to disclose information to others in matters relating to significant risks to your health and safety, or to the health and safety of others.

This personal information is normally retained for seven years after the relevant allegation, or for three years after you leave the Fellowship/Mastership, whichever is the shorter period.

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 College complaints procedures.

This information is normally retained for seven years after the relevant complaint is made, or for three years after you leave the Fellowship/Mastership.

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', in order to fulfill legal requirements placed upon the College or the University;
- ii) information relating to known family 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 Master or Fellow of the College or member of the University or the College;

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 to the health and safety of others.

Unless governed by statutory or other legal requirement, this information is normally retained until up to four years after you leave your Fellowship. Thereafter, some of it is retained in an anonymised form. Another subset is also retained indefinitely in our Biographical and Development Databases, covered by our **data protection statement for alumni of the College**.