

## **St John's College, Cambridge, Data Protection Statement: Current Undergraduates and Graduate Students**

This statement explains how St John's College, Cambridge handles and uses personal information we collect about those applicants to whom we make an offer of a place at the College, and about students in periodic residence in Cambridge **once they join 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 academics and students, living in Cambridge. This relationship requires us to guide and develop your academic studies, maintain and review your academic progress and pastoral welfare, 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 communications channels as we deem appropriate or necessary.

The controller for your personal information is St John's College, St John's Street, Cambridge CB2 1TP. 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 (01223 338661; 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 with us. We have commitments to other external bodies 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 basis, including where we are required to comply with a legal obligation, or where we believe it is in our legitimate interest to pursue the purpose. 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:

- A. maintaining your personal details, including basic spouse/partner information if they accompany you to Cambridge, 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, ensuring that you receive the credit due to you for that performance and again maintaining effective, accurate communication with you and with others involved in your education at Cambridge;

- C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere, ensuring that we can communicate your successes and individual distinctions to prospective employers and to others involved in your Cambridge career;
- 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 accommodation, your funding and other financial support arrangements, enabling us to perform contracts efficiently and to assist you if requested in the management of your finances while a student;
- F. provision of references to third parties;
- G. maintaining a record of your behaviour, in particular where concerns or complaints have been 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.

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 CCTV/door security policy 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 (for example, if you work or volunteer for us), you may be provided with additional data protection statements for those other roles, usually at the first point of engagement.

### **Retention of your information**

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

Where no specific retention period is noted, within four years of your graduation, or when you go out of residence for the final time, the College reduces your personal information to a subset of information so that we can retain a sufficient record of your academic achievements, and your time at the College, for references and related purposes. The archived record would typically retain:

- name, last known address, date of birth, year of admission to the College, schools attended, subjects, dates and classes of degrees, matriculation form, accommodation while a student, name of partner and dependents if they accompany you to Cambridge while you are a student, participation in sports and societies, details of immediate family as provided by you at admission, details of academic awards and prizes, and other College funding, scholarship reports written by you, publications and other achievements that you have told us about or which appear in published University and College sources.

We strongly encourage all our students to remain in touch with the College after they leave and, for that reason, we transfer subsets of this retained information to our Development Office and Biographical Office. You are encouraged to read **our separate statements about personal information for alumni**, which cover 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 College, academic performance, details of prizes and awards, dietary preferences, financial circumstances as declared by you, emergency contacts as declared by you, disabilities declared by you, details of accidents or other personal incidents requiring the intervention of the Porters or College first aiders. Again, this is considered necessary for the College to operate smoothly.

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

### *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 vary, 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. The University and its partners, including the College, have a data sharing agreement to govern such interactions and information transfers, as well as a shared student record system and database. If you transfer to another College, we will share personal data with that College given your consent. We share your name, email address, and details of your academic performance with external College Teaching Associates, Directors of Studies, and supervisors in order to arrange teaching and academic support. With your consent we will share data with the University Disability Resource Centre, in order to fulfil our obligations to provide suitable resources for students with disabilities. Where relevant, we provide an annual return to the University Childcare Office detailing your name, CRS ID, course, nationality and number of children, for so long as you are a resident junior member of the University.

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, as well as any other information necessary for the College to fulfill its obligations and agreements with the University in respect of a shared University community.

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: <https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data>.

### *With other organisations*

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

- the Cambridge City Council and other local authorities, in order 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 personal fee payers, the Student Loans Company and the Cambridge Trust;

- your former school or college, or national or local media, in respect of outstanding examination performance or other noteworthy achievement;
- your registered GP medical practice on a student by student basis, including the settlement of payments owed them for medical letters and other services;
- Insurance companies in respect of room and bicycle insurance, under a data sharing agreement, or when a student is likely to make a claim on the College insurance;
- External lettings agents, with your prior knowledge;
- Banks and building societies, when requested by you or by a company for which you work, in order to open an account;
- the Health and Safety Executive and UK Immigration authorities, under specific statutory obligations falling on the data subject and/or the College;
- Universities and Colleges Admissions Service, in relation to your application, offer and requirements to meet any offer of study;
- The College's solicitors in some cases concerning students;
- With your consent, we share reports of your progress submitted by you with the donors of certain named bursaries and other funds.

We may also be subject to a legal requirement to share your personal information with some government agencies, such as the police or other statutory authorities with investigatory powers, under special circumstances, for example relating to crime or health and safety. Where possible, the College will notify you of its intention to share such information in advance.

We recognise that health data in particular are of a sensitive nature. 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 the health and safety of others.

We will normally provide confirmation of your qualifications and other academic references to a prospective employer or financial sponsor 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, or to provide services to you through a third party on our behalf. Examples of such advice include legal and audit services, fee status verification services, and intercollegiate agreement services. In such circumstances, data sharing agreements are in place to ensure your personal information is not shared more widely, or retained for longer than necessary.

The College may share information with organisations overseas as part of arrangements related to your membership of the College, for example in respect of a field trip or student exchange programme. In most cases, this will relate to the operation of a contract.

#### *Publication of your personal information*

We will 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 used, please speak to the relevant College staff 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: April 2021*

## Annex

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

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, for example student number, CRSID, date of birth, photograph;
- iii) your current and previous contact details, including College address;
- iv) next-of-kin and emergency contacts;
- v) your partner's name, if you have declared that you are accompanied on applying to Cambridge or if you subsequently apply for partnered accommodation to the College;
- vi) number and ages of dependent children;
- vii) immigration status of overseas students, for example visa information, passport details.

We will assume that you have obtained permission from your next-of-kin, partner or emergency contact for us to hold their information for that purpose.

B. maintaining a formal record of your academic progress and achievements while 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 academic provision put in place by the College, including names of Tutors and Directors of Studies, supervisions, end of term/year reports from your supervisors and other official assessors, self-assessment forms, College examinations/progress tests and other academic support;
- iii) matriculation and graduation details, and records of your academic qualifications, including those achieved prior to becoming a member of the College;
- iv) other details of your academic progress or achievements, for example College or University awards or prizes, travel awards and UARP applications;
- v) application for and participation in student exchange programmes;
- vi) records of academic appeals.

Where an award or prize is provided by an external sponsor, we will normally share details about you and your academic performance with them. Records of student exchanges are anonymised by the Senior Tutor's Office four years after graduation. Apart from the record of participation, travel award and UARP applications are retained for no more than three years. Records of academic appeals are retained by the Senior Tutor's Office for ten years.

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

- i) records of your membership of College committees, the Junior Common Room, Samuel Butler Room and College clubs and societies;
- ii) records of keeping term, exeats and vacation residence application forms;
- iii) records of your library borrowing, and any fines that accrue, processing data entered on and stored on a shared University-wide Library system;
- iv) awards, prizes and achievements in College or University-related activities;
- v) 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.
- vi) records of subject access requests made by you under the terms of the Data Protection Act (2018)

Records of keeping term and Fitness Centre registrations are retained in hard copy for ten years, and in electronic form for six years. Exeats are disposed of at the end of the current academic year. Records of dining arrangements are retained by the Steward's Secretary for up to five years. Vacation residence application forms are anonymised after the first academic year, and in that state are retained for a further four years. Library transactions are not retained for more than a year after you go out of residence in Cambridge. Subject access requests are retained for three years after the year in which they were made; copies of ID supplied in support of such requests are destroyed six months after the response to the request is sent; an anonymised log of all requests made to the College is retained permanently. Some details processed under this heading will eventually form part of an alumni record. You can see the Data Protection Statement for non-resident alumni of the College [here](#).

- 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, by medical professionals, by the University of Cambridge, or created by us, including:

- i) details of medical history as disclosed by you, including details of any disability, illness, condition and any consequent learning support, loans of College equipment, social support or other support needs, dietary preferences, and counselling referrals;
- ii) details of consultations with College Health Centre staff;
- iii) statements from professional medical advisers, provided either by you or directly to us;
- iv) details of any accident or injury sustained while on College premises, or requiring the intervention of the Porters or other first aiders;
- v) details of any serious risks affecting you, including severe allergies;
- vi) arrangements agreed with you to manage your use of College and University facilities, including personal evacuation plans and any other special requirements that may be linked to your health or religious beliefs;
- vii) details of equipment loans;
- viii) details of any issues raised by you about your College accommodation;
- ix) College gym registration;
- x) car registration, motorcycle and bicycle registration, parking and safe storage details;

- xi) arrangements to deliver pastoral care through meetings or discussions with the Chaplain.

Accident/incident reports maintained by the Porters are normally deleted after three years. Most of the data generated within our Health Centre in the College are retained for eight years. Personal evacuation plans are retained only for the duration of a student's residence in the College. Records of dietary preferences are discarded in the year after a student goes out of residence permanently. Records held by the Chaplain are retained for as long as the student is resident in Cambridge, and/or under the Chaplain's pastoral care.

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 read 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. These may include Cambridge Bursaries; other studentships or awards, including means-tested bursaries drawing with the student's consent on information stored under the Higher Education Bursary and Scholarship Scheme; fee status; childcare grants; learning and research grants; tenth-term funding for graduate students; and additional hardship or other discretionary funding benefits, loans 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, payment mitigation and late payment forms;
- vi) records of any work undertaken for the College, such as supervisions or invigilation;
- vii) copies of any correspondence with you about any of the above matters.

This information is normally retained until seven years after you complete your studies, but some records, for example lists of those who have received College funding, are retained permanently in order to inform future decisions by matching cases and needs, and for the purposes of historical analysis and research. Where this information includes the personal information of others, for example parental income evidence, we will assume that you have their permission to provide it to us for our purposes. Evidence of eligibility for means-tested bursaries is deleted in the Senior Tutor's Office after five years, with basic statistical information anonymised at that point. Payment claims made prior to March 2020 are retained for ten years and after that date, for five years. Records of research awards and grants to graduates are held for no longer than ten years. Unsuccessful applications for



Graduate Scholarship competitions are kept for no more than one year. College exam invigilation records are held for two years.

F. provision of references to third parties:

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

- i) information from 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, in particular where concerns have been raised or complaints made. We retain personal information provided by you or by others, or created by us, including:

- i) student contract forms;
- ii) details, including the final outcome of any investigations undertaken by the College into your conduct or behaviour (for example disciplinary investigations, fitness to study investigations, complaints made against you);
- iii) 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 *Student Handbook* and *Standing Orders of the College* contain further details. We recognise that investigations may include information or statements of a sensitive or disputed nature, and that such records require a high level of confidentiality. While we will wherever possible discuss and agree with you in advance with whom and when we share this information, 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.

Much of this information is normally retained until one year after you complete your studies. Copies of individual student contracts may be retained by the College for up to ten years, in order to cover students' residence in the College and in order to deal efficiently and accurately with any ongoing issues after their departure.

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 six years.

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', for example nationality, ethnicity, religious and other beliefs, gender, sexuality, and age, in order to fulfill legal requirements of the College or the University;
- ii) information relating to known family relationships with other past or present members 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.