

Data Protection Policy **Students**

How we use your personal information

This statement explains how King's College ("the College", "we" and "our") handles and uses information we collect about those applicants we make an offer of study to, 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, reviewing 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.

The controller for your personal data is King's College, King's Parade, Cambridge, CB2 1ST. 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 Freedom of Information Officer, foi@kings.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 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 we are required 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). 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:

- 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. administering the Health and Safety practices and policies of the College;
- H. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
- I. maintaining a record of any complaints you make to the College and their outcomes;
- J. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes;
- K. administering our accommodation agreements with you.

Further details are provided in the Annex.

Please note that if you engage with us for any other purpose (e.g. you work for us, or volunteer for us), there are additional data protection statements that cover that engagement. In particular, the Development Office keeps basic student data, and certain data may be kept about everyone who is physically present on College premises - see the Data Protection Policies for 'Alumni and Friends' and 'While on the Premises'. If you are an Ambassador on our Access Platform, certain data is held about you on our behalf, for the purposes of helping us recruit the best applicants. See <https://legal.theaccessplatform.com/> for further information on that processing.

How long 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.

The College publishes a data retention schedule, which you can receive digitally or in print upon request to archivist@kings.cam.ac.uk; (0)1223(3)31444.

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 Office. You are encouraged to read our separate Data Protection Policy about personal information for alumni, which covers your ongoing lifelong membership of the College.

How we share your personal information

Within the College

We share the following information with relevant people within the College:

- your contact details, including your email address;
- your educational progress and attainment;
- your financial and other commitments to the College;
- particular interests and conditions that may require College action or monitoring;
- achievements/prizes that Development would like to share with alumni or otherwise publicise.

'Relevant people' includes but is not limited to other students with shared experiences, for example other members of a seminar or lab group, students with the same tutor, or people undertaking the same exchange programme.

This is necessary for the College to operate smoothly but you can request a greater level of privacy by contacting the College's Data Protection Officer.

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.

The King's College Student Union (KCSU) is a separate entity for data processing purposes. We share your data as necessary with KCSU, for example email addresses of freshers so their College parents can contact them; and your current status as a member of King's is accessible to a designated member of KCSU through a bulk-download facility, an Application Programming Interface with the on-line Gatelist, for the purpose of administering Formal Hall tickets.

Otherwise, the College restricts the sharing of your personal information within the College in a way that ensures that it can discharge its duty of care to you whilst ensuring that only relevant data is shared on a strictly 'need to know' basis. For sensitive data (including disciplinary matters, and special category data such as racial or ethnic origin, political opinions, religious or philosophical beliefs, health, gender or sexual orientation) we will always ask for your consent to share. However, there may be situations where the risk of harm to yourself or others means that certain data must be shared without your consent if absolutely necessary.

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, and in addition will include any information necessary for the College to fulfill 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: <https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data>. 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:

- 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);
- Other Colleges insofar as they provide services to us (such as tutorials or residential accommodation).

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 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 provide confirmation of your attendance at King's, the years of matriculation and graduation and the course of study (but not your exam results) when requested, as this information is published in the Reporter in any case.

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 technical support, 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, 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 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, except as described above.

We would encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments. Please note the College's Social Media Policy:

<http://www.kings.cam.ac.uk/students/social-media-guidelines>

Please also note the University's people search function may also be widened to be accessible to the general public by changing the settings at <http://www.lookup.cam.ac.uk/self>: its default setting is otherwise 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.

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 Data Protection Officer using the details below.

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/>).

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.

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, we will normally share details about you and your academic performance with them. We may also publicise your achievements elsewhere, but would seek your consent before doing so.

- 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 (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.

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.

This information is normally retained until six years 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 Service 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. An exception to this is if the College has loaned you money which you have agreed to pay back following graduation, but where you have not done so. In that case we will retain the information until the debt has been repaid or written off.

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. administering the Health and Safety practices and policies of the College:

We retain details of your attendance at training and induction sessions. We also retain information that may be provided by you and/or other College members and/or any eyewitnesses as appropriate, of accidents or events in which you were involved.

H. 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 in a confidential manner. 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 until one year after you complete your studies.

I. 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.

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” (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfill 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;

K. administering our accommodation agreements with you:

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

- ii) your preferences in room assignment;
- iii) our contracts and agreements with you;
- iv) financial arrangements;
- v) maintenance of your room and common areas of the hostel;
- vi) anything you tell us about your dining needs and preferences.

If you have concerns or queries about any of these purposes, please contact the Information Officer as above, or speak to your Tutor.

Document Details		
Responsible Officer	First Bursar	
Original Date	15 May 2018	
Next Review Date	October 2025	
Version Control		
Version No.	Approval Date	Change Description
V1	15.5.2018	First issue.
V2	18.1.2019	Changes to contact details throughout; addition of H&S policy administration and accommodation to processing activities; addition that King’s will confirm Kingsmen in some cases; removal notice of notice of CCTV (there is a separate policy for that); clarification of ‘relevant people’ with whom we share data.
V3	29.10.2019	Addition of data sharing with other Colleges who provide services to us.
V4	18.5.2021	Addition of newly instituted facility The Access Portal and that the Development Office keeps student data.
V5	25.10.2021	Addition of ‘technical support’ to reasons for data sharing.
V6	4.7.2023	Update to reflect sharing with KCSU including through an API and clarification of what constitutes sensitive data.
V7	24.10.2023	Transfer of existing policy to pro-forma.