The information and guidelines within this policy are important and apply to all members and staff\(^1\) of the College who shall in this policy be referred to as the “College Community”. Non-compliance may result in disciplinary action in accordance with the College’s procedures.

**Introduction**

Like all educational establishments, the College holds and processes information about its members, employees, applicants, students, alumni and other individuals for various purposes. Examples of such purposes are: the administration of the admissions process; the effective provision of academic and welfare services; to record academic progress; to operate the payroll and to enable correspondence and communications, including the provision of references and certificates. To comply with data protection law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully.

**Notification to the Data Protection Commissioner**

The College has an obligation as a Data Controller to notify the Data Protection Commissioner (formerly called the Data Protection Registry) of the purposes for which it processes personal data. Individual data subjects can obtain full details of the College’s data protection registration/notification with the Data Protection Commissioner from the College Data Protection Officer or from the Data Protection Commissioner’s website (http://www.dpr.gov.uk).

Listed in the Schedule to this policy is a summary of the main categories of data that the College may hold/process, the main purpose(s) for holding/processing such data, the possible disclosures of such data and the likely sources of such data.

---

\(^1\) Includes for the purposes of this policy, all Directors of Studies and Supervisors for the College who are not Fellows of the College.
Data Protection Principles

The College, as a Data Controller, must comply with the Data Protection Principles that are set out in the 1998 Data Protection Act. In summary these state that personal data, whether held in electronic form on a computer or on paper in a manual file, shall:

- Be obtained and processed fairly and lawfully and shall not be obtained or processed unless certain conditions are met.
- Be obtained for specified and lawful purposes and shall not be processed in any manner incompatible with those purposes.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for those purposes.
- Be processed in accordance with the data subject’s rights under the 1998 Act.
- Be kept safe from unauthorised access, accidental loss or destruction.
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

“Processing” Data

“Processing” in relation to information or data, means obtaining, recording or holding the information or data or carrying out any operation or set of operations on the information or data, including:

- Organisation, adaptation or alteration of the information or data.
- Retrieval, consultation or use of the information or data.
- Disclosure of the information or data by transmission, dissemination or otherwise making available, or
• Alignment, combination, blocking, erasure or destruction of the information or data.

**Data Protection Officer**

The College Data Protection Officer is the Junior Bursar. All queries about the College policy and procedures and all requests for access to personal data should be addressed to the Data Protection Officer.

**Responsibilities of Individual Data Users**

All members of the College Community who record and/or process personal data in any form (called “Data Users” in this policy) must ensure that they comply with the requirements of the 1998 Act (including the Data Protection Principles) and with the College’s data protection policy (including any procedures and guidelines which may be issued from time to time). A breach of the 1998 Act and/or the College’s data protection policy may result in disciplinary proceedings.

In particular members of the College Community must not, without the prior written authorisation of the Data Protection Officer:

• Develop a new computer system for processing personal data;

• Use an existing computer system for processing personal data for a different purpose;

• Create a new manual filing system containing personal data;

• Use an existing manual filing system containing personal data for a different purpose.

The above does not apply to databases which are maintained by individual Data Users within the College Community for their private domestic use, ie private address books. Individual data users, however, should consider if their private use falls within the scope of the 1998 Act.
“Data Holder Contacts”

The Data Protection Officer may from time to time designate “Data Holder Contacts” for particular types of data within the College whose responsibilities will include:

- Informing the Data Protection Officer of proposed processing of personal data within the College that may need to be notified to the Office of the Data Protection Commissioner;

- Providing personal data on a particular subject to the Data Protection Officer in response to a subject access request when requested to do so by the Data Protection Officer; and

- Maintaining the security of, and access to, personal data within their areas. When files/information are stored electronically on a computer the computer software is to include protection against computer viruses and the information held is to be backed-up regularly, with the back-up system stored separately. The computer is to be password protected and is to be stored in a locked office whenever unattended.

Data Holder Contacts include:

**The Master** – in respect of Members of the College Community’s personnel and personal matters and applications for Fellowships.

Personnel and personal files maintained in respect of Fellows, students and staff of the College may be consulted on a day-to-day basis by the Master and his secretary. All other requests for access to personnel files must be authorised by the Master. Personnel and personal files are to be kept in a locked filing cabinet and the cabinet shall be stored in the Master’s Secretary’s office. That office is to be locked at all times when the room is not occupied.

**The Vice-Master** – In respect of Fellows’ service on College Council or Committees, entertainment and certain other aspects of communal life. Also in respect of members of the College exercising their various privileges in the College. Such files are to be consulted only by the Vice-Master or his secretary, and kept in a locked room.
**The Senior Bursar** - in respect of the Council Report Book; Fellows’ medical scheme; housing loans; stipends; other loans, grants and allowances; College tenants.

Files are maintained on the Fellows’ medical scheme; FSSU and USS records of former Fellows; housing loans; other loans grants and allowances and College tenants and may be consulted by the Senior Bursar, Chief Clerk, Estates Clerk and the Senior Bursar’s secretaries. The Senior Bursar and Chief Clerk may authorise requests for access by others. The files are to be kept in locked filing cabinets within the Bursary and the Bursary is to be locked at all times when not occupied.

**The Junior Bursar** – in respect of staff personnel matters, applications for staff posts, financial and accommodation matters.

Personnel files are maintained in respect of College staff. Application forms are to be retained for a limited period for subsequent monitoring/follow-up of the selection process.

Personnel files may be consulted on a day-to-day basis by the Junior Bursar and the Personnel Co-ordinator. All other requests for access to personnel files must be authorised by the Junior Bursar or the Personnel Co-ordinator. Personnel files are to be stored in a locked cabinet in the Junior Bursar’s secretary’s or Personnel Co-ordinator’s offices. The offices are to be locked whenever unoccupied.

**The Senior Tutor** – in respect of Tutorial files and files on members of the Teaching Staff.

Tutorial files are maintained in respect of students’ academic progress and welfare, awards of scholarships and prizes, loans and grants. Medical notes are also maintained for Health & Safety reasons, to assist in meeting the needs of students with disabilities, or for reasons connected with absences from College, poor performance, applications to the University or to charities etc. Tutorial files may be consulted on a day-to-day basis by the Senior Tutor, his Assistant, the Tutor for Admissions, Side Tutors and their secretaries. All other requests for access to a tutorial file must be authorised by the Senior Tutor or Side Tutor. Tutorial files are to be kept in a locked filing
cabinet in the offices of a Side Tutor or tutorial secretary and the office is to be locked whenever it is unoccupied.

Files on members of the Teaching Staff are consulted only by the Senior Tutor and his Assistant. Requests for access to these files can be authorised only by the Senior Tutor. Files are to be kept in a locked filing cabinet in the Senior Tutor’s office, which is to be locked when unoccupied.

**The Tutor for Admissions** – in respect of admissions candidates.

Admissions files are maintained to assess candidates for admissions. For successful candidates some of the admissions documentation is included in a tutorial file, for unsuccessful candidates the admissions documentation is archived for subsequent research into the admissions process.

Prior to and following admissions the files may be consulted on a day-to-day basis by the Tutor for Admissions and his secretaries. During the admissions process, admissions files may be consulted by the Senior Tutor, the Tutor for Admissions, Admissions Officers and those interviewing candidates for admission. Active files are to be stored in a locked filing cabinet in the Admissions Office, which is to be locked whenever it is unoccupied.

All archived tutorial and admissions files are to be kept in a locked storeroom and access authorised by the Senior Tutor, Side Tutor or Tutor for Admissions.

The Tutor for Advanced Students similarly keeps admissions files on applicants for admission as graduates.

**Directors of Studies** – in respect of academic performance and progress.

Files are maintained to monitor and record students’ attendance for supervisions and their performance and progress in supervisions, other assessments and examinations.
Files may be consulted on a day to day basis by Directors of Studies and their secretaries. Access by others is to be authorised by the Director of Studies or the Senior Tutor.

Files are to be kept in the Director of Study’s/secretary’s office, which is to be locked whenever unattended.

**The Dean of College** – in respect of disciplinary matters.

Files are maintained in respect of any disciplinary matters involving students.

All such files are to be kept in the locked offices of the Dean of College, his secretary or those involved on the Dean’s Committee. All requests for access must be authorised by the Dean of College where the Dean has the discretion to give or decline such authorisation.

**The College Librarian** - in respect of books borrowed from the Library, the College Admissions Books and personal papers belonging to or deposited in the Library.

Files are maintained concerning books borrowed and fines incurred by members of the College. The College Admissions Books contain details supplied by students on their arrival in the College.

Borrowing files are held electronically and are consulted on a day to day basis by authorised members of library staff. Details of fines incurred are passed to the College Office for addition to students’ bills. The Admissions Books and personal papers are kept locked in the Library.

**The Director of Music** – in respect of choristers and organ scholars.

Files are maintained on applicants to be members of the choir and for organ scholarships.

All such files are to be accessed only by the Director of Music and the Chapel Secretary and the files are to be kept in the locked office of the
Director of Music. All requests for access to the files are to be authorised by the Director of Music.

**The Dean of Chapel and the Chaplains** – in respect of College livings, members of College staff and students.

Files are maintained on appointments to College livings, personal and administrative matters during the period of the appointment and to sensitive personal matters affecting members of College staff and students.

All such files are to be accessed only by the Dean of Chapel, the Chaplains and the Chapel secretary. The files are to be kept in a locked filing cabinet and the room is to be locked whenever unoccupied.

**Secretary to the Title A Electors** – in respect of candidates for the Title A Competition.

Files are maintained containing applications for the Title A Competition, referees reports and correspondence with managers. The files are compiled by the Senior Tutor’s Clerk and are to be accessed only by the Secretary to the Title A Electors and the Senior Tutor’s Clerk, although they may be consulted by Fellowship Electors. The files are to be kept in a locked filing cabinet in the Senior Tutor’s Clerk’s office and the room is to be locked whenever unoccupied.

The files of successful candidates are passed to the Library. The files of unsuccessful candidates who have further opportunities to apply for the competition are passed to the Senior Tutor and are stored by the Senior Tutor’s Clerk under the same conditions as for current files. The files of all other candidates are destroyed.

**Secretary to the Title B and Title D Committees** – in respect of candidates for Title B and Title D Fellowships.

Files are maintained containing applications and recommendations for Title B and Title D Fellowships, referees reports and associated correspondence.
The files are compiled, held and accessed by the Secretary to the Title B and Title D Committees but may be consulted by members of those committees. The files are to be kept in a locked cupboard or filing cabinet in the Secretary’s room and the room is to be locked whenever unoccupied.

**The College Nurse** – in respect of medical files.

Medical files are maintained in respect of the health and welfare of members of the College Community.

Medical files are consulted on a day-to-day basis by the College Nurse (and her locum). All other requests for access to medical files are to be authorised by the College Nurse.

Medical files are to be kept in locked cupboards in the College Nurse’s office, which is to be locked when unattended.

**Employing Officers** (The Senior Bursar, Junior Bursar, Senior Tutor, Librarian, Steward and Dean of Chapel) – in respect of personnel matters and applications for posts for the Heads and Deputy Heads of respective Departments.

Personnel files are maintained on the staff Heads and Deputy Heads of Departments and may be consulted on a day to day basis by the employing officer and his/her secretary. Access to such files can only be authorised by the employing officer.

Files are to be stored in the employing officers’ office, which is to be locked when unoccupied.

**Heads of Department** (The Catering Manager; Chief Clerk, Bursary; College Office Accountant; Sub-Librarian; Clerk of Works; Housekeeper; Computer Manager; Head Porter and Head Gardener) – in respect of personnel matters and applications for posts within their departments.

Departmental personnel files are maintained for personnel within a department and may be consulted on a day-to-day basis by the Head
of the Department or their Deputy. All other requests for access to
departmental personnel files must be authorised by the Responsible
College Officer, Head of Department or Deputy.

Departmental personnel files must be kept in the locked office of the
Head of Department. Application forms are retained for a limited
period for subsequent monitoring/follow-up of the selection process.

**Pay and Pensions Clerks** – files/information in respect of
payroll/pensions information for Fellows and staff.

The files/information may be consulted on a day-to-day basis by the
Pay and Pensions Clerks or the College Office Accountant. All other
requests for access to files/information must be authorised by the
senior Pay and Pensions Clerk or College Office Accountant.

Files/information must be kept in the locked offices of the Pay and
Pensions Clerks.

**Personnel Co-ordinator** – files/information in respect of individual
members of staff and potential members of staff, including
information on pay and allowances, departmental and health & safety
issues.

The files may be consulted by the Personnel Co-ordinator and Junior
Bursar on a day-to-day basis. All other requests must be authorised by
the Personnel Co-ordinator or Junior Bursar.

Files/information must be kept in locked file cabinets within the
Personnel Co-ordinator’s office, which is to be locked when not
occupied.

**Porter’s Lodge** – file copies of incident reports.

The files may be consulted on a day-to-day basis by the Head
Porter/Deputy Head Porter. All other requests for access to the files
are to be authorised by the Head Porter/Deputy Head Porter.

The files are to be kept in a locked cupboard in the Head Porter’s
office.
**Computer Manager** – computer files and databases containing personal information in respect of members of the College Community.

The files/information may be consulted on a day-to-day basis by the Computer Manager and Computer Officers. All other requests for access to files/information must be authorised by the Computer Manager or Chairman of the Computing Committee.

The computer and database systems holding files/information are to be password protected and stored in computer staff offices that are locked when not occupied. They are to be backed-up regularly on an electronic media storage systems stored separately from the computer/database in a secure area that is locked whenever unoccupied.

The Computer Manager and Computer Officers are authorised (Council Minute 394.(i). dated 30th November 2001) to monitor the Trinity College Computer Network (TCDN)/Cambridge University Data Network (CUDN) for purposes of network performance, bandwidth costs and non-compliance with Joint Academic Network (JANET), CUDN and College policies and applicable laws. A copy of the TCDN/CUDN User Policy is attached at Annex A.

**College Database**

The College holds data on members of the College Community and candidates for admission on the College Database. Its use is for the effective administration of the College and in due course that data forms the Register of Members.

Access to the data held on the College Database is restricted according to the need of the various users, as is the ability to enter data. In addition to names, year and tutorial side the information to which they have access is:

- **Admissions.** The Senior Tutor, the Tutor for Admissions and their secretaries have access to all the data held on candidates for admission.
Admissions Officers and those interviewing candidates have access to data on candidates in those subjects for which they have responsibility.

- **Tutorial.** Side Tutors and their secretaries have access to all the data held on current students.

- **College Office.** The Junior Bursar, College Office Accountant and the Members’ Accounts staff have access to the financial aspects of data, including that required to determine fees, grants, scholarships and charges for accommodation, catering and buttery charges and Library fines. The Register of Members secretary and the Praelector’s secretary have access to basic data (other than financial and tutorial).

- **Accommodation Office.** The accommodation clerk has access to local addresses, for accommodation purposes and to information affecting accommodation such as sex, dietary restrictions and disability.

- **Personnel Co-ordinator.** Access to all data held on members of College staff.

- **Porter’s Lodge.** Access to local and home addresses and to ‘up’ and ‘down’ dates, to determine a student’s current address and to arrange forwarding/ redirection of mail.

- **Register of Members.** The Register of Members Secretary has access to the archived files of members of the College and to the current files of Fellows for alumni relations purposes, including the distribution of the Annual Record.

- **College Housekeeper.** As for the Accommodation Office.

**Data Security and Disclosure**

Members of the College Community are responsible for ensuring that:

- Any personal data which they hold is kept securely; and
• Any personal data is not disclosed either orally or in writing or accidentally or otherwise to any unauthorised third party.

Unauthorised disclosure is a disciplinary matter and may be considered gross misconduct. If in any doubt, consult the College Data Protection Officer.

Personal data must be:

• Kept in a locked filing cabinet, drawer or room; or

• If it is computerised, be password protected or kept only on a disk that is itself kept securely.

In addition to the requirements of the Data Protection legislation the confidentiality of information about individuals must be respected.

**Members, Staff and Candidates**

Members, staff and candidates must ensure that any personal data provided to the College is accurate and up to date. They must ensure that any changes of address or other personal details are notified to the relevant College Department/Data Holder contact.

Members and staff who use the College computer facilities must not unless authorised elsewhere in this document hold or process personal data about others. To do so is a disciplinary offence.

Certain types of personal data may be processed for particular purposes without the consent of individual data subjects. It is the College’s policy however to seek express consent from individual data subjects for the main ways in which the College may hold and process personal data concerning them. This is to allow individuals an opportunity to raise any objections to any intended processing of personal data. The College will consider any such objections but reserves the right to process personal data in order to carry out its functions as permitted by law.

Therefore all prospective members and staff will be asked to sign a consent form when an offer of employment or a course place is made regarding
particular types of information which the College may in due course hold/process about them. Candidates for admission will be sent a consent form, see Annex B, when an application is acknowledged. Existing members of the College Community will also be asked to sign a consent form, see Annex C.

In addition to the College having a legitimate basis for holding/processing personal data (such as consent), the College must only process such data fairly, for example in compliance with any duty of confidentiality owed to the individual concerned.

**Right to Access Personal Data**

Members, staff and other individuals have the right under the 1998 Act to access any personal data that is being held about them either in an “automatically processable form” (mainly computer records) or in “relevant filing systems” (ie structured files that enable personal data relating to a particular individual to be readily accessible) or to request the correction of such data where they are incorrect. An individual who wishes to exercise his/her right of access should complete the College “Access to Personal Data” form, which is available from the Junior Bursar’s office and send it to the College Data Protection Officer, see Annex D.

Any inaccuracies in data disclosed in this way should be communicated immediately to the Data Protection Officer who will take appropriate steps to make the necessary amendments.

The College will make a charge of £10 (or other such charge as is permitted from time to time by the Data Protection Act 1998) on each occasion that access is requested and this fee should accompany the Access to Personal Data form. In accordance with the 1998 Act, the College reserves the right to refuse repeated requests where a reasonable period has not elapsed between requests.

The College will normally respond to the request for access to personal data within 40 days of the request or payment of the fee, whichever is the later.

individuals extended rights of access in certain circumstances to information that is not held on computer or in a relevant filing system.

Please contact the Data Protection Officer for further information.

**Disclosure Outside of the EEA**

The College may, from time to time, desire to transfer personal data to countries or territories outside the European Economic Area in accordance with purposes made known to individual data subjects. For example the names and contact details at the College of members or staff on a web site may constitute a transfer of personal data world wide. Accordingly the consent form signifies an individual’s consent to the inclusion of such data on an authorised College web site. If an individual wishes to raise an objection to this disclosure then written notice should be given to the Junior Bursar. Other personal data, even if it would otherwise constitute fair processing, must not be disclosed or transferred outside the EEA without an individual data subject’s consent if the College is not satisfied that the country or territory in question ensures an adequate level of protection for the rights and freedoms of data subjects.

**Sensitive Personal Data**

The College may from time to time process “sensitive personal data” relating to members, staff and candidates.

“Sensitive personal data” is information as to a data subject’s racial or ethnic origin, political opinions, religious beliefs or beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life, offences or alleged offences, and information relating to any proceedings for offences committed or allegedly committed by the data subject, including the outcome of those proceedings.

Currently, the College envisages the need to process sensitive personal data of a type specified in the Schedule to this policy, for the purposes specified. For example, data relating to the ethnic origin of members or staff of the College may be processed for the purposes of equal opportunities monitoring, or for any necessary dietary requirements and possible sources of financial assistance. With the subject’s consent where applicable, medical records may need to be processed for the provision of healthcare and general
welfare, for any necessary dietary requirements and accommodation issues and to assist in meeting the needs of members of the College Community with disabilities. In exceptional circumstances the College may need to process information regarding criminal convictions or alleged offences in connection, for example, with any disciplinary proceedings or other legal obligations.

In other circumstances, where sensitive personal data is held or processed, the College will seek the explicit consent of the member or staff member in question unless one of the limited exemptions provided in the Data Protection Act 1998 applies (such as to perform a legal duty regarding employees or to protect the data subject’s or a third party’s vital interests).

**Data Processed for Research Purposes**

Personal data held by the College may be processed for research purposes, including statistical or historical purposes. Personal data must not be used in this way if to do so would, or would be likely to, cause substantial damage or substantial distress to the individual data subject(s). Accordingly, it is the College’s policy for prior written approval to be obtained from the College Data Protection Officer for any research involving personal data held by the College. Personal data used for research purposes must not be published or disclosed in any way in which the individual data subject can be identified.

**CCTV**

The College operates a number of CCTV cameras in order to assist with security for members of the College Community and in respect of College property. Any queries regarding the operation of the CCTV system should be addressed to the Junior Bursar. Requests for access by individuals to personal data held on the CCTV system should be made by completing an Access to Personal Data form and sending it (together with the requisite £10 fee) to the College Data Protection Officer, with as much information as possible to enable the data to be located (including, if possible, details of the relevant camera, location, time and date).

**E-mail**

It is permissible and appropriate for the College to keep records of internal communications which are relevant to an individual’s continuing
relationship with the College, whether as a Fellow, member of staff or student, including information concerning performance and conduct issues, provided such records comply with the data protection principles.

It is recognised that e-mail is used for such communications and that such e-mails should form part of the College’s records. It goes beyond the scope of this policy document to address the appropriate use of e-mail in the proper functioning of the College, and the limitations and legal implications with this mode of communication. However all members of the College Community need to be aware that:

- The 1998 Act applies to e-mails containing personal data about individuals that are sent or received by members of the College Community (other than for their own private purposes as opposed to College purposes).

- Subject to certain exceptions, individual subjects will be entitled to make a data subject access request and have access to e-mails that concern personal data concerning them, providing that the individual subject can provide sufficient information for the College to locate the personal data in the e-mails; and

- The legislation applies to all e-mails from and to members of the College Community that are sent and received for College purposes, whether or not the e-mails are sent through the College e-mail system or on an individual’s own e-mail account.

Retention of Data – College Archives

The individual files relating to Fellows and students of the College are the basis of the alumni records and detailed historical archives of the College and are retained indefinitely for reference and research purposes. At some point after a member leaves the College his or her files will be transferred to the College’s archives, stored in the Library. The timing of such transfer will differ between the various Data Holder Contacts, depending on a number of factors. Until such transfer, files/information may be consulted on a day-to-day basis in accordance with the procedures set down for the individual Data Holder Contacts and thereafter by them or the College archivist or, for alumni purposes, by the Editor of the Annual Record and the Register of Members Secretary. All other requests for access to any archived file must
be authorised by the Librarian, after consultation with the Senior Bursar or Junior Bursar with respect to Bursary/College Office files and the Senior Tutor for former tutorial files.

All data about College staff is to be kept for at least the minimum specified by legislation after they cease to be employed by the College, see Annex E.

The College retains an archive of miscellaneous written records/lists in respect of its members, staff and candidates for reference and research purposes, including supervision reports, academic records, Senior Tutor’s records and correspondence. The confidentiality of these records will be respected. Subject permission to access archived records must be obtained from the Data Protection Officer.

**Alumni Relations and Development**

Manual and computer files are maintained in respect of current and past Fellows and alumni for alumni relations and development purposes.

All such files are to be kept in a locked cabinet in the Register of Members Secretary’s office which is to be locked whenever unattended. Access to the computer database is to be password protected. The Editor of the Annual Record and the Register of Members Secretary may consult the manual and computer-based files on a day to day basis but requests by others to have access to these files must be authorised by the Development Officer (the Senior Bursar).

Data will be used by the College for a full range of alumni activities, including the sending of College publications, notification of alumni activities and fund raising programmes and initiatives.

Individual’s consent will be sought to disclosure of their contact details before they are made available to other current and old members of the College, recognised alumni societies, to sports and other clubs associated with the College and to any agents contracted by the College for particular alumni-related activities.

The following classes of information will be included in the College alumni computer database:
• Name and address

• Academic achievements and establishments

• Career details

• Family information

• Donations to the College

Some personal data may also be held/processed in an anonymous form for statistical records and research purposes.

Complaints Procedure

Data subjects wishing to lodge a complaint with regard to the College’s handling of data/alleged unauthorised disclosure/disagreement with information held, should do so in writing to the College’s Data Protection Officer (the Junior Bursar). The Data Protection Officer will seek to resolve the issue to the satisfaction of the data subject. Should the Data Protection Officer be unable to resolve the matter the data subject may ask that the complaint be referred to the College Council. The data subject may also complain to the Data Protection Commissioner.

4th July 2002
Schedule to the
Trinity College Policy and Procedures on Data Protection

<table>
<thead>
<tr>
<th>Data:</th>
<th>Personal details; academic record; qualifications and skills; student record; financial details.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main purposes:</td>
<td>To assess applications from candidates for admission and assist in the admissions process; accommodation issues; to process proper and up to date records of academic progress; fees and charges administration/collection; salary and pension administration; legal issues and obligations (eg Health &amp; Safety record); communications/mailings; references; fund raising by the College and the University; research.</td>
</tr>
<tr>
<td>Main sources and disclosures:</td>
<td>Applications forms; family; local authority (and other governmental bodies); examinations results; scholarships; Student Loans Company; University of Cambridge; College Staff and Committees; other Cambridge Colleges; other Universities; schools; examination boards; other educational institutions; employers; legal representatives; admissions officers; data subject; web sites.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Data:</th>
<th>Medical Records</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main purpose:</td>
<td>Provision of healthcare and members’ and staff welfare; dietary requirements; accommodation issues.</td>
</tr>
<tr>
<td>Main sources and disclosures:</td>
<td>Data subject; family; College Nurse; Senior Tutor; other College staff; University of Cambridge; General Practitioners; other medical practitioners.</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Data:</th>
<th>Ethnic origin</th>
</tr>
</thead>
<tbody>
<tr>
<td>Main purpose:</td>
<td>Equal opportunities monitoring; dietary requirements; accommodation purposes</td>
</tr>
<tr>
<td>Main sources and disclosures:</td>
<td>Application form; data subject; research and statistical publications only</td>
</tr>
<tr>
<td>Data:</td>
<td>Criminal Records</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------------------------------</td>
</tr>
<tr>
<td>Main purpose:</td>
<td>Disciplinary matters; legal obligations</td>
</tr>
<tr>
<td>Main sources and disclosures:</td>
<td>Application form; data subject; police (and other authorities); legal representatives; Court services; University of Cambridge; College staff; other Cambridge Colleges; other universities</td>
</tr>
</tbody>
</table>
To assist the College comply with its legal obligations under the data Protection Act 1998, you have been issued with details of the College’s policy and procedures on data protection.

Whilst this is not strictly necessary in every case, it is the College’s policy to seek the consent of members and staff of the College to hold and process personal data about them. Listed in the Schedule to the College’s policy and procedures on data protection are the main categories of data that the College may hold/process, the main purpose(s) for holding/processing such data, the possible disclosures of such data and the likely sources of such data. Full details of the College’s data protection/notification with the Data Protection Commissioner can be obtained from the Junior Bursar as the College’s Data Protection Officer. In addition to having a legitimate basis for processing data, the College has a duty only to process that data fairly (for example in accordance with any duty of confidentiality owed to you).

Please sign underneath to confirm your consent. If you have any queries they should be raised with the Data Protection Officer.

I confirm that I have received a copy of the College’s Policy and Procedures on Data Protection and consent to the College holding and processing the categories of personal data about me, including sensitive personal data, as specified in its registration/notification to the data protection Commissioner for the specified purposes (summarised in the College’s Policy and Procedures on Data Protection).

Name …………………………………………………………………………….. (Please print)

Signed ……………………………………………………………………………..

Date …………………………………..
Trinity College, Cambridge
Access to Personal Data Request Form

If you wish to make a “data subject access request” pursuant to the data Protection Act 1998, you should do the following:

1. Fill in all the relevant sections on the attached form;

2. Hand or send in this form to Trinity College, Cambridge, CB2 1TQ, marked for the attention of the College’s Data protection Officer, the Junior Bursar, together with:

   a. An administration fee of £10 (this can be, for example, in the form of a personal cheque, banker’s draft, building society cheque or postal order; please do not send cash through the post); and

   b. A copy of proof of identification in addition to a copy of your student identification where applicable. Acceptable proofs of personal identification include a copy of your driving licence; a copy of your birth certificate or a copy of your passport with the relevant pages showing your name, the passport number and photograph.

3. The Data Protection Officer will issue a letter of acknowledgement on receiving your request and will begin to process the request as soon as adequate information has been provided by you in order to identify the personal data required, there is acceptable proof of your identification and the College has received the administration fee from cleared funds where appropriate.

The College requires proof of identification because it has a legal duty to ensure that personal data is only disclosed to those entitled to have access, usually only the data subjects themselves. Failure to provide adequate information to facilitate a data subject access request search and/or failure to provide acceptable proof of identification and/or failure to pay the administration fee will result in a delay to the processing of your application.
The College reserves the right to refuse vexatious or repeated requests made unreasonably often. The College may be unable to provide information that contains data about or identifies third parties.

The Data Protection Act 1998 applies to personal data on automated equipment (such as computers) and, once the 1998 Act is fully in force, to certain paper records where specific information is readily accessible.
Trinity College, Cambridge
Access to Personal Data Request Form

I would like copies of personal data held about me, in so far as the information is governed by the Data Protection Act 1998, in the categories set out in this form:

<table>
<thead>
<tr>
<th>Family name:</th>
<th>First name(s):</th>
</tr>
</thead>
<tbody>
<tr>
<td>Date of birth:</td>
<td>Student number (USN) (if applicable)</td>
</tr>
</tbody>
</table>

Term time or permanent address:

Address during vacations:

Department and course currently enrolled on or department where employed:

<table>
<thead>
<tr>
<th>Type/Source of Record</th>
<th>Please tick as appropriate</th>
</tr>
</thead>
<tbody>
<tr>
<td>Student records - admissions</td>
<td></td>
</tr>
<tr>
<td>Student records - tutorial</td>
<td></td>
</tr>
<tr>
<td>Student records - disciplinary</td>
<td></td>
</tr>
<tr>
<td>Student records – academic staff’s records (please specify)</td>
<td></td>
</tr>
<tr>
<td>Computing records</td>
<td></td>
</tr>
<tr>
<td>Library records</td>
<td></td>
</tr>
<tr>
<td>Financial records</td>
<td></td>
</tr>
<tr>
<td>Personnel records</td>
<td></td>
</tr>
<tr>
<td>Medical records</td>
<td></td>
</tr>
<tr>
<td>Other – please specify</td>
<td></td>
</tr>
</tbody>
</table>

Signed by the data subject ………………………………Dated ……………

College use only:

Date form received ………………… A dequate personal identification …………
Administration fee ………………… A dequate identification of data …………
Signed …………………………… Date ……………………………
## Trinity College, Cambridge
### Retention of Records Containing Personal Data

<table>
<thead>
<tr>
<th>Type of Record</th>
<th>Retention Period</th>
<th>Reason for Period</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel Files including training records and notes of disciplinary and grievance hearings.</td>
<td>6 years from the end of employment by the College.</td>
<td>References and potential litigation.</td>
</tr>
<tr>
<td>Applications forms/interview notes</td>
<td>At least 6 months from the date of the interviews</td>
<td>Time limit on litigation.</td>
</tr>
<tr>
<td>Facts relating to redundancies where less than 20 redundancies</td>
<td>6 years from the date of redundancy</td>
<td>Time limit on litigation.</td>
</tr>
<tr>
<td>Facts relating to redundancies where 20 or more redundancies.</td>
<td>12 years from the date of the redundancies</td>
<td>Limitation Act 1980</td>
</tr>
<tr>
<td>Income tax and NI returns, including correspondence with tax office</td>
<td>At least 3 years after the end of the financial year to which the records relate.</td>
<td>Income Tax (Employment) Regulations 1986</td>
</tr>
<tr>
<td>Statutory Maternity Pay records and calculations</td>
<td>At least 3 years after the end of the financial year to which the records relate.</td>
<td>Statutory Maternity pay (General) regulations 1986</td>
</tr>
<tr>
<td>Statutory Sick Pay records and calculations</td>
<td>At least 3 years after the end of the financial year to which the records relate.</td>
<td>Statutory Sick Pay (General) Regulations 1982</td>
</tr>
<tr>
<td>Wages and salary records</td>
<td>6 years</td>
<td>Taxes management Act 1970</td>
</tr>
<tr>
<td>Accident books, records and reports of accidents</td>
<td>3 years after the date of the last entry</td>
<td>Social Security (Claims and Payments) regulations 1979; RIDDOR 1985</td>
</tr>
<tr>
<td>Health Records</td>
<td>During employment</td>
<td>Management of Health and Safety at Work Regulations</td>
</tr>
<tr>
<td>Health Records where reason for termination of employment is connected with health, including stress related illness</td>
<td>3 years</td>
<td>Limitation period for personal injury claims</td>
</tr>
<tr>
<td>Medical records kept by reason of the Control of Substances Hazardous to Health Regulations 1999</td>
<td>40 years</td>
<td>Control of Substances Hazardous to Health Regulations 1985</td>
</tr>
<tr>
<td>Student Records, including academic achievements and conduct</td>
<td>At least 6 years from the date that the student leaves the College, in case of</td>
<td>Limitation period for negligence.</td>
</tr>
<tr>
<td>Reason for retention</td>
<td>Duration</td>
<td>Permitted use</td>
</tr>
<tr>
<td>----------------------</td>
<td>----------</td>
<td>---------------</td>
</tr>
<tr>
<td>Litigation for negligence.</td>
<td>At least 10 years for personal and academic references.</td>
<td>Permits the College to provide references for a reasonable length of time.</td>
</tr>
<tr>
<td>Certain personal data may be held in perpetuity</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

While personal and academic references may become ‘stale’, some data, e.g. transcripts of student marks, may be required throughout the student’s future career. Upon the death of the data subject, data relating to him/her ceases to be personal data.