

How we use your personal information

Students

This statement explains how Trinity 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 Trinity College, Cambridge, CB2 1TQ. 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, may be contacted at data.protection@trin.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. maintaining a record of your behaviour and in particular where there have been concerns or complaints raised about you;
- H. maintaining a record of any complaints you make to the College and their outcomes;
- I. maintaining a record of any references received;
- J. provision of freshers' preferred email and course details to the TCSU/BA Society to enable contact to be made in advance of arrival and to assist with the College parenting system used to help freshers settle in to College;
- K. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, please contact the Trinity College Data Protection Lead: data.protection@trin.cam.ac.uk.

We also operate CCTV, which will capture footage and a SALTO lock system, which uses user-ID technology. The CCTV policy is available at <https://www.trin.cam.ac.uk/website/dpn/>.

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 you will be provided with for those other purposes, usually at the first point of engagement.

How long we keep your information for

The College will retain a sufficient record of your academic and other achievements for references and other related purposes. Some of your personal data is kept indefinitely and your tutorial file is transferred to the College Archive where it may be used in future for research or historical purposes. Your personal data will at all times be held securely and remain confidential to relevant staff within the College during your lifetime.

Information contained in the archived record includes your

- Biographical details (includes names, date of birth, contact details, photograph)
- Application form
- References received and given
- Interview records
- Offer letters including funding offers
- Copies of all references written (even if duplicated)
- Supervision records
- Academic records (including results)
- Information relating to intermission or withdrawal
- Major disciplinary matters (e.g. dishonesty, harassment, non-attendance)
- Incident and accident reports
- Records of merit-based awards or special prizes
- Records of funding awards

Files may include copies of correspondence relating to any of the above.

We strongly encourage all of our students to remain in touch with the College after they graduate and, for that reason, we transfer a subset of this data to the College Alumni and Development Office. You are encouraged to read our separate data protection statement to cover your ongoing lifelong relationship with the College at: <https://www.trin.cam.ac.uk/alumni/information/dataprotectionstatement/>

How we share your personal information

Within the College

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

- name
- CRSid
- college address
- preferred contact details
- emergency contact(s) including home address and details of next of kin
- your photograph

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

The College receives a full set of examination results which is shared confidentially with relevant fellows of the College, members of the teaching staff, and tutorial staff, for internal use only.

The sharing of this information is considered necessary for the College to operate smoothly.

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. 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 Students Record System ('CamSIS') which is used by the University and Colleges of Cambridge ('Collegiate Cambridge') is controlled by both parties, except for 'College only' fields, which are controlled solely by the College (e.g. tutorial side). The University and the Colleges are together responsible for keeping CamSIS up-to-date.

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 fulfil its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the Colleges and the University). Where possible, the College will notify you of its intention to share such data in advance.

The University is a separate legal entity to the College and has its own statement about your personal information and its procedures, which you can view at:

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

The University in turns shares information with the affiliated student unions and a number of other bodies for statutory and other purposes.

With other organisations

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

- 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);
- certain Trinity College Alumni Associations (unless you have opted out of these);
- the NHS or other health services in case of an emergency.

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.

The University will issue official University Transcripts and Academic Verification Letters through Digitary Core (<https://core.digitary.net/#/user/login>), a secure electronic document system which also allows students to release/share information electronically to other organisations. All students are encouraged to use this facility for routine confirmation of qualifications. The College will provide academic references to other academic institutions, a prospective employer or financial sponsor but reserves the right to request a completed consent form from the party requesting the information before providing such information.

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 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. student exchange programme, choir tours, field trips or liaison with an overseas funding provider). In most cases, this will be related to the operation of a contract.

Publication of your personal information

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

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 is used, please speak to the relevant College staff in the first instance. 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 <https://ico.org.uk/concerns/>.

*Last updated: May 2018
Trinity College Data Protection Lead*

ANNEX

We collect and process your personal information, as specified below, for a number of purposes and may retain copies of any correspondence touching on these matters.

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 and emergency contacts.

We will assume that you have obtained permission from your next-of-kin and emergency contacts for us to hold their information for 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.

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 Trinity College Student Union (TCSU), the BA Society 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.

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 **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.**

Please note that where you make use of services not offered directly by the College (e.g. the University Counselling Centre and the University's Disability Resource Centre), these support services will have their own data protection statement (or privacy notice) and we advise you pay close attention to these.

E. Maintaining financial records relating to your studies, your funding and other financial support arrangements:

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

- i) records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges (e.g. kitchen fixed charge), as well as what monies are to be, and have been, collected by the College on behalf of itself and the University; this may include records of non-payment or late payment of bills;
- 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 contracts (licence to occupy)
- 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.

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.

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. Maintaining a record of your behaviour and in particular where there have been concerns or complaints raised about you:

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

- i) details of any investigations undertaken by the College into your conduct or behaviour (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, with which you are expected to familiarise yourself. 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.

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.

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 indefinitely 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 fulfil legal requirements of the College or the University;
- ii) information relating to your rights to live, work and study in the United Kingdom;
- iii) any criminal record that may affect your status as a student of the University or the College.

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Trinity College Data Protection Lead