



Girton College Cambridge

## Current Students Data Protection

This statement explains how Girton 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 Girton College, Huntingdon Road, Cambridge, CB3 0JG. The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd (OIS 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 College Data Protection Lead ([data.protection@girton.cam.ac.uk](mailto:data.protection@girton.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;



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- G. maintaining a record of your behaviour and in particular where there has been concerns or complaints 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](#). If you have concerns or queries about any of these purposes, please contact us at the address given below, or speak to the College Data Protection Lead.

We also operate CCTV in various locations on our main site, which will capture footage.

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 [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 access on the College's Teams site.

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 Development Office. You are encouraged to read our separate statement about personal information for alumni, which covers your ongoing lifelong membership of the College at <https://www.girton.cam.ac.uk/alumni-and-supporters-data-protection>.

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

#### *Within the College*

We share the following information with relevant people within the College as described in [Appendix 1: Student Records – Detailed Information](#). Again, this is considered necessary for the College to operate smoothly but you can request a greater level of privacy by contacting the College Data Protection Lead.

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.

Otherwise, the College restricts the sharing of your personal information within the College in line with its confidentiality policy.

#### *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



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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. 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>. 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).

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 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, and intercollegiate agreement services) or to provide services to you through a third party on our behalf. In such circumstances, data sharing agreements are in place to ensure your personal information is not retained by them for longer than necessary or otherwise shared more widely.

The College may share information with organisations overseas 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.



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We would encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

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>. The 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 College Data Protection Lead 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: 30<sup>th</sup> June 2023  
College Data Protection Lead

### Version Control

Date	Version	Review reason	Author
13/04/2018	Draft	New statement for review by Tutorial Office	College Data Protection Lead
24/05/2018	1.0	Publication	College Data Protection Lead
28/03/2023	1.0	5 year review by Student Services	College Data Protection Lead
30/06/2023	1.1	Publication	College Data Protection Lead



## 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 in accordance with the ordinance and publish your achievements in College publications.

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:



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- 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 up to ten years after you complete your studies.

Please note that where you are referred to services not offered directly by the College (e.g. College nurse, College counsellor, 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. residential 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 (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.

### 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.



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- G. 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 with our confidentiality policy. 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 up to ten years after you complete your studies, depending on the nature of the complaint.

- 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 up to ten years after you complete your studies, depending on the nature of the complaint.

- 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” (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 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;

If you have concerns or queries about any of these purposes, please contact us, or speak to College Data Protection Lead.



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## Appendix 1: Student Records – Detailed Information

This statement explains how the College (“we” and “our”) handles and uses data we collect about our students.

### How the College uses your data

In broad terms, we use your data to enable the admissions process and the provision of education and welfare services to our students.

These activities include:

- to facilitate the administration of student accommodation,
- to provide up to date academic records,
- to assist in the administration and collection of fees and charges,
- to comply with legal and other obligations (e.g. health & safety),
- to facilitate communications and mailings,
- to enable the provision of references,
- to assist with fund-raising by the College and the University,
- for alumni activities
- for research and archive purposes.

### What data is held by the College

Primarily information is provided by the students themselves (by way of application forms and other means), by third parties such as schools, local authorities and examination boards and from information sources in the public domain.

### University centrally managed systems

We work closely with the University in order to facilitate the efficient administration and co-ordination of admissions and student academic services. As a result, the College has access to and maintains our own student data by means of a number of University centrally managed database systems.

These shared systems are noted as follows:

#### CamSIS

The College maintains all student records, from admissions to graduation, using CamSIS – the University’s official repository of student information. Access is managed by the College and assigned only to those who process student data as part of their College role.

#### CamCORS

The College maintains all student supervision records using CamCORS – Cambridge Colleges’ Online Reporting System for Supervisors. Access is managed by the College and assigned only to those who process student data as part of their College role.

#### University Card

The College processes and maintains all student access cards using the University Card Database. Access is managed by the College and University Card Office, and assigned only to those who are involved with student identity management and security access as part of their role in the University.

### College Systems





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The College processes its student data through a number of local systems for the efficient administration of College-specific student academic services and activities.

These systems are noted as follows:

### **College Finance System – SUN**

The College processes and maintains all student financial records using SunSystems – a financial management system. Data is derived in part from CamSIS and used for billing, processing student loans and fees information. Access is managed by the College and assigned only to those who process student financial data as part of their College role, i.e., the Finance Department.

### **Door access system**

The College processes and maintains all student access records using Chubb security systems. Data is derived in part from the University Card database and used for the access and security of College members to its buildings and facilities. Access is managed by the College and assigned only to those who process the College security arrangements, i.e., the IT Department and the Porters' Lodge.

### **College payment management system**

The College processes and maintains student payment records for College catering, catering events and general (Lodge) purchases using the Uniware and UPay systems. Data is derived in part from the University Card database. Access is managed by the College and assigned only to those who process College payment transactions information, i.e., the Catering department, the Finance Department, the Porters' Lodge and the IT Department.

### **College Library system**

The College processes and maintains all student library records using the Heritage Library Management system. Data is derived in part from the University Card database and CamSIS to provide access to the College library's facilities and services. Access is managed by the College and assigned only to those who process the College's Library services, i.e., the Library staff and IT Department.

### **College events and gift administration system**

The College processes and maintains a basic record of all current student information to facilitate event and gift administration using the Raiser's Edge Database (Blackbaud RE NXT). Data is derived in part from CamSIS and from student's communications with the Development Office. Access is managed by the College and is assigned only to those who process College events and gift administration, i.e., the Development Office, Mistress's Office and IT Department.

### **College health and welfare system**

The College processes and maintains a basic record of all current student information to facilitate records of medical support provided by the Health and Welfare Team on a cloud-based database. Data (name, gender and Cambridge email address) is initially derived from CamSIS. Access is managed by the College and is assigned only to those who process medical information, i.e., the Nurses and Head of Welfare and Wellbeing.

## **External Systems**

### **Student Loan Company**

The College has access to and processes personal information regarding tuition fees, financial support and bursaries through the Student Loans Company database. Data is derived directly from students, who provide detailed personal information regarding their personal/family financial circumstances in order to support



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their application for financial support. Students give explicit consent for the College to have access to the data they provide. Access is limited to the Head of Student Services, who provides confirmation of a student's academic status (e.g., attendance/intermittence and course changes) to facilitate the authorisation of loan payments and the Senior Bursary Clerk, who processes the student fee loan financial information for the College.

### **Additional services**

The College processes and maintains all student data in order to provide access to or facilitate ancillary services. Data is derived from CamSIS. Access is managed by the College and assigned only to those who process student data for these systems, i.e., the IT Department.

#### **Applicable systems:**

- College website
- Virtual Learning Environment (Moodle)
- Student election systems e.g., JCR elections
- College Microsoft Teams sites

### **Hard copy information**

Hard copy student records (Tutorial records) were created at matriculation for every student up to Michaelmas 2022. These records, which were previously held by the student's Tutor and Director of Studies throughout their academic career, are now stored with the Student Services department until a student has completed their course, and are processed and stored securely in accordance with the College's Records Retention Schedule.

Hard copy student records may include:

- Student's original application and acceptance: CAF/CAPO, CIGAS and UCAS forms; offer and acceptance letters; references in support of student's application.
- Notes on candidates by admissions interviewers/reviewers.
- Student financial guarantees and Declaration of acceptance and funding (graduate students).
- Verification of student record at matriculation/ Graduate registration form.
- Allowances: Records documenting the temporary withdrawal of a student from the College.
- Exeats: forms giving permission to leave Cambridge overnight, or at the end of term.
- Graduate students' approvals for leave to work away, intermit or defer.
- Examination entry verification forms.
- Thesis information e.g., Approval of graduate thesis title; Certificate of graduate thesis submission; Notification of approval of thesis.
- Notifications of University and College bursaries, scholarships and prizes and/or awards from external funding agency e.g. ERSC.
- Summary of personal details and academic career "Archive sheet".
- Employment references written by Tutor/Director of Studies.
- Disability references

### **Electronic information**

From October 2022, all student records have been created as an electronic record. The record is stored and processed securely on the College network, and supplements the information that is not available on a



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student's CamSIS record. Data is derived from a number of sources, and is accessible only to the Student Services Department.

A secure electronic student resource has been created using Teams and SharePoint, to provide information not accessible via CamSIS, to Tutors and Directors of Studies – as an alternative to the hard-copy file. Access is based on an individual's role/relationship to each student and is reviewed annually (or sooner), in-line with changes to academic and pastoral support.

The electronic record is processed and stored securely in accordance with the College's Records Retention Schedule.

### **Sensitive Information**

#### **Medical records**

Medical records are kept in order to assist in meeting the needs of students with disabilities, to assist with any dietary and accommodation requirements, and to provide appropriate educational services.

Medical information is provided initially by the student at Matriculation for the purposes stated and held securely by the College Nurses. Additional medical information may be collected and processed by the College Nurses during a student's academic career. Access to student medical records is limited to the College Nurses and shall be held in accordance with the principles of medical confidentiality.

#### **Complaints and disciplinary proceedings**

Records relating to student complaints and disciplinary proceedings are kept in order to document the investigation of complaints made by students against the College, University and/or other student(s). Access to student complaints or disciplinary information is limited those involved with the investigation (e.g., the Senior Tutor, College Tutor, Dean of Discipline and Head of Student Services) and is held securely and confidentially by the Head of Student Services in accordance with the College's Records Retention Schedule.

#### **Criminal Records**

The College may receive information about a student's criminal record or allegations of a criminal offence from the student or from external sources, such as the police or the Criminal Records Bureau. The College may process information regarding criminal records in order to protect other members of the College and the University, to operate a proper disciplinary procedure, to assist with the provision of references and to comply with any legal obligations.

Access to student criminal records or allegations is limited to, and held securely by the Senior Tutor, the Head of Student Services and the College Tutor in accordance with the College's Records Retention Schedule.

### **Disclosure of personal data**

In order to ensure the proper functioning of the College as an institution in the higher education sector, the College may from time to time, consider it appropriate to disclose relevant personal data about students within the College to:

- other members of staff,
- committees and organisations,
- to various external bodies, including the College Visitor,
- appropriate members of staff of the University of Cambridge, other Cambridge Colleges, and inter-collegiate bodies,
- other educational institutions,
- employers and potential employers,
- professional bodies,
- funding bodies,



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- local authorities and other governmental and regulatory bodies.

The College may or may not seek further consent to specific disclosures depending upon the intended disclosure.

### **Medical information**

The student will be asked to give explicit consent for any information that they provide to the College or a member of College staff about their medical condition to be disclosed to the College Nurse and the Senior Tutor (and other members of College staff as the Senior Tutor considers necessary).

However, personal data shall not be disclosed outside the College, except with the student's explicit consent to the proposed disclosure or in other circumstances required or permitted by law (for example, in an urgent or emergency situation to protect the vital interests of the student or another person). The College may inform the student's "emergency contact" of necessary medical information in such circumstances.

### **Criminal Records**

The College may also be obliged by law to disclose information about a student's criminal offences or allegations of criminal offences to other external bodies, such as the police, in certain circumstances. The College may also be permitted by law to disclose such information to other external bodies without the student's explicit consent in other circumstances (for example where the proposed disclosure is necessary to protect the vital interests of another person).

Subject to the requirements of the Rehabilitation of Offenders Act 1974, and the prior specific authorisation of the College Data Protection Officer, the student will be asked to give explicit consent to the disclosure of information about their criminal offences or allegations of criminal offences to appropriate staff within the College, to appropriate staff or officers of the University of Cambridge or of other Colleges within the University of Cambridge.

### **Retention and Archive of student records**

After a student has completed their course, the Tutorial file is kept securely for three years and accessed only by the Student Services Department.

Following this period, the Tutorial file is reviewed and prepared for transfer to the College's Semi-Current Records Store. The file is kept securely for a further seven years and is accessible only by the Records Management Officer and to the Student Services Department by request.

The Tutorial file is subject to a final review after this period in order to be prepared for transfer to the College Archive. The personal information contained in these files form part of the archives of the College, and will be retained indefinitely for consultation by third parties for statistical, historical or biographical research purposes.

Access to the Tutorial files held in the Archive is restricted to the Student Services Department and only for limited administrative purposes. Tutorial files are 'closed' to all other College members and external researchers for the lifetime of the student. After the 'closed' period, access to the Tutorial files will be maintained in accordance with the Data Protection Act.