

## How we use your personal information

### Students

This statement explains how the Woolf Institute (“the Institute”, “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 Institute (“you” and “your”). Broadly, we use your personal information to manage the ongoing relationship between the Institute 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 Institute and (if you live in Institute 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 information is the Woolf Institute, Madingley Road, Cambridge CB3 0UB. The person 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 information, is the Director of Services & Administration, Ms Amy Rhys-Davies, [ar936@woolf.cam.ac.uk](mailto:ar936@woolf.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 of the Institute, the expectations on both sides during your course of studies and any related accommodation contract). Depending on the nature of your studies, we may have commitments to other external bodies (such as 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 Institute

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 Institute, the colleges and University of Cambridge, the institutions of the Cambridge Theological Federation (CTF), Cambridge Muslim College (CMC) and elsewhere;
- C. maintaining a formal record of your other engagements with and achievements at the Institute, the colleges and University of Cambridge, the institutions of the CTF, CMC and elsewhere;
- D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in Institute and, where relevant, college and University of Cambridge life (including any support needs that are, or have been, provided by the Institute; college(s) of, or the University of, Cambridge; or your institution(s) of the CTF; or elsewhere, such as CMC, during your course of studies), as well as information about your general health and wellbeing;
- E. maintaining financial records relating to your studies, funding and financial support arrangements;

- F. provision of references to third parties;
- G. maintaining a record of your behaviour, especially where there have been concerns or complaints raised about you;
- H. maintaining a record of any complaints you make to the Institute and their outcomes;
- I. maintaining data to enable production of 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 Director of Studies.**

**We also operate CCTV on our sites, which will capture footage. Our CCTV policy can be viewed at <https://www.woolf.cam.ac.uk/about/governance-policies>.**

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

- Details of some or all of your school, college and university education;
- Application form;
- References received and given;
- Interview records;
- Supervision records;
- Academic records;
- Medical information (only kept if pertinent to a cause of death or serious injury);
- Information related to if you leave prematurely;
- Major disciplinary matters (e.g. dishonesty, harassment, non-attendance);
- Correspondence (including biographical details, addresses and career after you left the Institute);
- Examination results;
- Records of merit-based awards or special prizes;
- Unique personal identifiers (e.g. student number, date of birth); and
- Your contact details.

Finally, we strongly encourage all of our students to remain in touch with the Institute after they leave and, for that reason, we transfer a subset of this information to our Development Office. You are encouraged to read our separate statement about personal information for alumni, which covers your ongoing connection with the Institute at <https://www.woolf.cam.ac.uk/about/governance-policies>.

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

*Within the Institute*

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

- your name and course of study, or the title/subject of your dissertation or thesis;
- academic or financial awards, such as bursaries and scholarships;
- particular personal needs you require meeting to participate fully in Institute life;
- your other engagements with and achievements at the Institute, the colleges and University of Cambridge, the institutions of the CTF, CMC and elsewhere;
- your behaviour and in particular where there have been concerns or complaints raised about you;
- any complaints you make to the Institute;
- financial information relating to bursaries, fee payments and other charges, e.g. rent;

This is considered necessary for the Institute to operate smoothly, but you can request a greater level of privacy by contacting the Director of Studies.

The Institute also takes photographs of its students, either individually and/or as a group in photographs, such as on arrival for staff recognition purposes, at the time of graduation and at Institute events. These are used within the Institute 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 <https://www.woolf.cam.ac.uk/about/governance-policies>

*With the University and colleges of Cambridge, the institutions of the CTF and CMC*

If for the purposes of your studies, you have been enrolled as a member of a college within collegiate Cambridge and registered for a course of study, you are automatically a member of the University of Cambridge. The academic and student support arrangements between the Institute, your 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) may be shared routinely and often with the University of Cambridge, and the University of Cambridge and its partners (including the colleges) have a data sharing agreement to govern such interactions and information transfers in both directions, as well as a shared student record system and database.

The personal information shared with the University of Cambridge, your college within collegiate Cambridge (including CTF), or CMC, 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 Institute to fulfill its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the colleges and the University).

The University of Cambridge is a separate legal entity to the Institute, as are the colleges of collegiate Cambridge, CTF institutions and CMC and each has its own statement about your personal information and its procedures. You can view the University of Cambridge statement at

<https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data> and the CTF's at <https://www.theofed.cam.ac.uk/faq-items/what-is-the-federations-data-protection-policy/>. They in turn share information with the affiliated student unions and a

number of other bodies for statutory and other purposes.

*With other organisations*

The Institute 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.

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) 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 shared more widely.

The Institute may share information with overseas organisations as part of arrangements related to your study at the Institute (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. 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 of Cambridge's people search function may also be widened to be accessible to the general public by changing the settings at <https://www.lookup.cam.ac.uk/self>: its default setting is 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 Institute staff in the first instance. If you need further guidance, please contact the Director of Services & Administration, 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: March 2020*

**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, colleges of the University of Cambridge, CTF, CMC, 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 Institute, your Cambridge college, the University of Cambridge, CTF, CMC and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, colleges of the University of Cambridge, the institutions of the CTF, or CMC, 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 Institute (including supervisions, Institute examinations and other academic support);
- iii) matriculation and graduation details and records of your academic qualifications (including those prior to becoming a student at the Institute);
- iv) other details of your academic progress or achievements (e.g. Institute, CTF, CMC, 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 and publish your achievements in Institute publications in print and online.

- C. maintaining a formal record of your other engagements with and achievements at the Institute, the institutions of the CTF, CMC, your College(s), the University of Cambridge and elsewhere:

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

- i) records of your membership of Institute or college committees, your college Junior Common Room (JCR) or Middle Common Room (MCR) and your Institute or college clubs and societies;



- ii) awards, prizes and achievements in the Institute, the institutions of the CTF, CMC, your 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 Institute, college and University life (including any support needs that are, or have been, provided by the Institute, CTF, CMC, your College or the University of Cambridge 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, colleges of the University of Cambridge, CTF, CMC, 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 Institute, CTF, CMC, 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 reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

Please note that where you are referred to services not offered directly by the Institute (e.g. your College nurse, your College counsellor, the University of Cambridge Counselling Centre and the University of Cambridge'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, colleges of the University of Cambridge, CTF or CMC, or created by us), including:

- i) records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges, as well as what monies are to be, and have been, collected by the Institute on behalf of itself and the University of Cambridge;

- ii) records of any financial support agreed by the University and/or the Institute (including Cambridge-Woolf Scholarships, other studentships or awards, additional discretionary funding, benefits or waivers approved by the Institute), CTF, or CMC;
- iii) where you reside in accommodation owned or managed by the Institute, 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 Institute 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 by the University of Cambridge, colleges of the University of Cambridge, CTF or CMC, or created by us), including:

- i) records of your advisers, including where relevant your Tutor, Course Leader, Supervisor and other nominated Institute personnel who provided you with personal support.

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 the University of Cambridge, colleges of the University of Cambridge, CTF or CMC, or created by us), including:

- i) details of any investigations undertaken by the Institute 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 of Cambridge or one of the colleges, CTF, or CMC into your conduct or behaviour.

The Institute has several complaints procedures, relating to different matters, which you are expected to familiarise yourself with. We recognise that investigations may include information or statements of either a sensitive or disputed nature, and that such records require a high level of confidentiality. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

H. maintaining a record of any complaints you make to the Institute and their outcomes:



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

- i) details of any complaints you have made to the Institute and their outcomes, where these have been taken through the Institute complaints procedure.

This information is normally retained until three years after you complete your studies.

- I. maintaining data to enable the Institute to produce statistics and research for internal and statutory reporting purposes.

It is difficult to provide a comprehensive list, but we retain personal information (provided by you), including:

- i) information relating to “equal opportunities” (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfill legal requirements of the Institute;
- ii) information relating to known relationships with other staff or students (past or present) of the Institute, the University of Cambridge or any of the Colleges, CTF or CMC;
- 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 Institute, the University of Cambridge or your College, CTF or CMC;

**If you have concerns or queries about any of these purposes, please contact us, or speak to the Director of Studies.**