



How we use your personal information

Visiting Students and Incoming Exchange Students

This statement explains how Clare Hall (“the College”, “we” and “our”) handles and uses information we collect about visiting students and exchange students (“Visiting Students”) who visit the College to undertake research and study (“you” and “your”). In broad terms, we use your personal information to manage the ongoing relationship between the College and you and to manage your visit to the College. This includes guiding and supporting your academic studies, maintaining and reviewing your pastoral welfare, establishing and 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 Clare Hall, Herschel Road, Cambridge CB3 9AJ.

The Data Protection Officer for the College is the Office of Intercollegiate Services Ltd [12B King’s Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk]; OIS Ltd. should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement. The person within the College otherwise responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the The Bursar, dpo@clarehall.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 Visiting Student, the expectations on both sides during your visit and any related accommodation contract). In some cases you will be providing personal information to us, alongside consent for us to use that information to provide for your needs, or otherwise to provide you with an improved service during your stay at Clare Hall. 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 record of your attendance and all relevant activities at the College;
- C. maintaining a record of your visit to the College;
- D. maintaining a record, where appropriate, of any particular personal needs you require to participate in College life (including any support needs that are, or have been, provided by the College during your visit to the College), as well as information about your general health and wellbeing;
- E. maintaining financial records relating to your visit to the College, your funding and other financial support arrangements;
- F. provision of references to third parties if required;
- G. maintaining a record of your behaviour where there has been concerns or complaints raised about you



CLARE HALL CAMBRIDGE

- H. maintaining a record of any complaints you make to the College and their outcomes;
- I. other purposes;
- J. maintaining data to enable the College 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 above, or visit the Tutorial Office during working hours.

We also operate CCTV on our sites which will capture footage.

Our CCTV policy is available to read in the Data Protection section of the Clare Hall website at www.clarehall.cam.ac.uk

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 when you leave the College and go out of College accommodation for the final time, the College reduces your personal information to a subset of information so that the College can retain a sufficient record of your attendance for references and other related purposes, and your time at the College.

How we share your personal information

A) Within the College

We share the following information with relevant people within the College: Porters, Accounts, College Graduate Tutors, Supervisors, Accommodations, The Tutorial Office, members of the College, Housekeeping, IT.

The College also may take photographs of its students, either individually and/or as a group.

These may be used within the College and may be on public display.

Again, the above is considered necessary for the College to operate smoothly but you can request a greater level of privacy by contacting the Bursar at bursar@clarehall.cam.ac.uk.

Finally, we encourage all of our visiting students to remain in touch with the College after they leave and, for that reason, we may transfer a subset of this information to our Development Office. You are encouraged to read our separate statement about personal information for the Development Office, which covers your ongoing lifelong membership of the College, this available to read in the Data Protection section of the Clare Hall website at www.clarehall.cam.ac.uk.

With the University

By visiting the College as a Visiting Student and not having gone through the normal application procedure, please note that you are not a member of the University of Cambridge. Information relating to you (and particularly your academic studies) may be shared with the University, and the University and its partners (including the College) have a data sharing agreement to govern such interactions and information transfers in both directions, as well as a shared student record system and database.



CLARE HALL CAMBRIDGE

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 personal information shared with the University will include only that which is necessary for you to attend the College as a Visiting Student, and in addition will include any information necessary for the College to fulfill its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behavior, or complaints across all of the Colleges and the University). It in turn may share information with the affiliated student unions and a number of other bodies for statutory and other purposes. Where possible, the College will notify you of its intention to share such data in advance.

Additionally, we may share relevant information with University of Cambridge Departments, Fellows and students and the University Library if we are asked to liaise with The University Library, in order to provide you with access.

B) 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, Government Agencies, Research Institutes and/or your home university, as appropriate.

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) 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 visit to the College (e.g. organisers of field trips, student exchange programmes, and providers of overseas funding). 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 students, visiting or other, and Life Members of the College on 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



CLARE HALL CAMBRIDGE

by changing the settings at <http://www.lookup.cam.ac.uk/self>. Its default setting is otherwise to provide 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 easily.

Your rights

You have the right to:

- ask us for access to, rectification or erasure of your personal information
- restrict processing (pending correction or deletion)
- object to communications
- 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 one of the relevant College Administrators, in the first instance. If you need further guidance, please contact The Bursar at bursar@clarehall.cam.ac.uk.

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: 09/06/18



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. CRSID (if you receive one) , 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 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. your application details, our assessment of your application
- ii. records of your membership of College committees and College clubs and societies;
- iii. awards, prizes and achievements in College or University-related activities (e.g music, arts, sports etc.)
- iv. records of your academic provision from the College (including if applicable supervisions, College examinations and other academic support);
- v. records of your academic qualifications (including those prior to becoming a member of the College);
- vi. other details of your academic progress or achievements.

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 the Clare Hall Review and on the Clare Hall website.

C. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College life (including any support needs that are, or have been, provided by the College or the University during your visit 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.



CLARE HALL CAMBRIDGE

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 6 years after you complete your visit.

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.

- D. maintaining financial records relating to your visit, your funding and other financial support arrangements. Where this information includes the personal information of other (e.g. parental income evidence) we will assume that you have their permission to provide it for our purposes.)

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

- i) records of your sources of funding and, where relevant, records of your accommodation liabilities and other related charges (e.g. [kitchen fixed charge]), as well as what monies are to be, and have been, collected by the College on behalf of itself and the University;
- ii) records of any financial support agreed by the University and/or the College (including Cambridge Bursaries, other studentships or awards, additional discretionary funding, benefits or waivers approved by the College);
- iii) where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);
- iv) where appropriate, your banking details in order to conduct financial transactions with you and/or your sponsor, 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 six years after you complete your studies.

- E. provision of references to third parties.

In addition to the information above (and particularly your achievements in B above), we retain personal information (provided by you or created by us), including records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support.

- F. 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, these are available to read in the College Handbook for Graduate Students; and personal information will be managed in line with our confidentiality policy.

We recognise that investigations may include information or statements of both 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 have completed your studies.

G. 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 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 for one year after the completion of the complaint investigation.

H. other purposes.

We retain personal information (provided by you or by the University of Cambridge, or created by us), including your contact details, and other information provided by you for 6 years.

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 fulfill legal requirements of the College or the University;
- ii) information relating to known relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- iii) information relating to your rights to live, work and study in the United Kingdom;
- iv) any criminal record that may affect your status as a Visiting or Incoming Exchange Student of the College;
- v) others.

If you have concerns or queries about any of these purposes, please contact The Bursar, at bursar@clarehall.cam.ac.uk.