

Westminster College

Data protection statement and privacy notice: Students

This statement explains how Westminster College handles and uses personal data we collect about students. Where in this statement we refer to 'we' or 'our' or 'us' we are referring to Westminster College, Cambridge and where we refer to 'you' or 'your' we are referring to our students. We are registered with the Information Commissioner's Office (ICO) with registration number Z6779220.

We are committed to protecting your personal information and to being transparent about what information we hold. Westminster College understands its obligations to you to help you understand how and why we process your personal data. This notice tells you about these uses and should be read in conjunction with the Westminster College data protection policy.

Our data protection policy and procedures are governed by the Data Protection Act 1998 and, from 25th May 2018, the EU General Data Protection Regulation. The law in this area is changing rapidly and we anticipate this statement may be revised in line with guidance from the Information Commissioner's office.

Why we hold your personal data

Holding your personal data enables us, in partnership with others, to arrange provision of teaching and support required for your course of study, assessment and, where relevant, for your degree to be awarded.

Holding your personal data enables us to meet various administrative and legal obligations (eg for tax purposes).

We will also process your personal information in other circumstances, provided you have given your consent for us to do so.

Lawful basis for processing personal data

The lawful basis for processing the personal data of students as described in this document is **to fulfil a contract with an individual**.

There is a contractual requirement for you to provide much of the information detailed. Without this we will be unable to fulfil our obligations which could result in the contract terminating.

Westminster College may also store some of your personal data in accordance with other privacy notices (eg if you are a donor or a member of staff).

Personal data held by Westminster College

We may hold information relating to you from a number of sources. A significant proportion of the information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

Records will contain information you supplied when applying to study with us including, but not restricted to:

In common with all data subjects:

- Your name
 - Your contact details
 - Unique personal identifiers and biographical information (e.g. date of birth)
 - photographs of you;
 - your attendance at Westminster College or Cambridge Theological Federation ("CTF") events;
 - personal data provided by you for a specific purpose or purposes (for example, disability, catering preferences or lifestyle status for event management);
 - information related to the prevention and detection of crime and the safety of staff and students including, but not limited to, CCTV recording;
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Also:

- financial information gathered for the purposes of administering fees and charges, loans, grants, bursaries etc.;
- your visa requirements; copies of passports, visas, and other documents required to ensure compliance with Home Office requirements.
- Details of your education, qualifications and publications.

Particular to students:

- Your application
- Details of your career
- information about your areas of personal interest;
- enrolment information such as your choice of course, modules and associated timetabling provision;
- details of your student record including marks and examination results;
- information relating to breaches of regulations (disciplinary matters);
- information gathered for the purposes of equal opportunities monitoring;
- information about your engagement and use of services such as the Library and IT

Sensitive personal data held by Westminster College

The information we hold is that which you provide to us (for example, you may give us information by filling in forms on our website, or by corresponding with us by post, telephone, email or otherwise).

Records may contain:

- your religious affiliation
- your ordained status

How your personal data is used by Westminster College

Your data is used by us for a number of purposes including :

All data subjects:

- Publications, invitations and other communications.
- e-news and flash emails.
- internal reporting and record keeping.
- the promotion of college events.
- administrative purposes (e.g. in order to process fees payments or to administer an event you have registered for or attended).
- Responding to data access requests you make.

Also:

- Giving key fob access to parts of the premises.
- issuing references at your request.
- Inclusion on prayer lists.
- the college archives.
- Contacting you, your next of kin, or other relevant contact in case of an emergency.
- Inclusion in the college handbook
- Marketing, including images, online, in print and on social media (with your consent)

Particular to students:

- Enrolling you as a student and maintaining your student record.
- Administering your course and academic progress.
- Providing or offering facilities and services to you during your time as a student (e.g. library access, computing).
- Carry out our legal duties and statutory responsibilities, including statutory reporting.
- Administer security, disciplinary, complaint and quality assurance processes and arrangements.
- Monitoring compliance with the terms of any visa issued under the sponsorship of the Cambridge Theological Federation.
- Investigating indications of any breaches of regulations.
- Monitoring and evaluating the student experience and programmes.
- Conducting equal opportunities monitoring and equality impact assessments to ensure our policies

and practices do not discriminate against individuals.

Final academic awards from universities are regarded as public information.

Communications to you may be sent by post, telephone or a work email address. Your personal mobile phone number will only be used if you have given consent.

If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below. We will always respect a request by you to stop processing your personal data, and in addition your statutory rights are set out below.

Sharing your data with others

Within Westminster College, personal data, including sensitive personal data, may be shared between members of staff, including Trustees, who legitimately need the information to carry out their normal duties to support your time with us. We endeavour to ensure that sensitive personal data is only shared with colleagues with your explicit consent. However, circumstances may arise where this data is shared with colleagues without gaining your consent. This will only occur if it is necessary to protect your vital interests or the vital interests of another person; or for certain other reasons where it is not possible or appropriate to gain your consent such as disclosures to the police for prevention or detection of crime, or to meet statutory obligations relating to equality monitoring.

Westminster College may disclose certain personal data to third parties. These external organisations, and the purpose for sharing the information, are set out below.

Third Party	Purpose for Sharing information
Higher Education Statistics Agency (HESA), funding councils and other government bodies	Data will be passed to HESA, funding councils and government bodies as required. The HESA Student Collection Notice provides information to students about what happens when their data is sent to HESA. This information is available online at: https://www.hesa.ac.uk/about/regulation/data-protection/notices
Sponsors and other funders, where a contract exists	In accordance with the terms of the contract. This does not include third parties (such as parents) who may be paying for your studies but with whom no formal contract exists.
Educational loan providers (including Student Loans Company)	For the purposes of confirming identity, attendance and enrolment in order to facilitate and enable the provision of financial support to you as appropriate.
Your church authorities	Where is necessary for them to carry out their statutory functions.
Cambridge Theological Federation	Data will be shared with The CTF in connection with the administration of your course and studies, including library access, admissions, teaching, marking and validation
Validating universities	Depending on your course, information will be shared with the University of Cambridge, Anglia Ruskin University or Durham University for processes such as admissions, teaching and validation
The Higher Education Funding Council for England (HEFCE) and its agents	CTF must, statutorily, provide student statistical data to HEFCE and its agencies. HEFCE may also pass contact details to survey contractors to carry out the National Student Survey (NSS).
Potential employers or providers of education whom you have approached	For the purposes of confirming your qualifications and details of your time spent at Westminster College (dates attended, courses taken etc.)
UK or local government agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders,	As necessary, and with appropriate consideration of your rights and freedoms. Departments may include the Department of Work & Pensions, the Police, the Foreign & Commonwealth Office

collection of a tax or duty, enforcement of bye-laws, or safeguarding national security	
Home Office, UK Visas and Immigration (UKVI)	In order to fulfil CTF's obligations as a visa sponsor.
Third party software suppliers	Where external computer systems are required to facilitate the purposes listed in section 2, student data may be shared with software suppliers. Where strictly necessary, we (or CTF) may share copies of student data in order to test or troubleshoot the IT systems we use or plan to use. Any such transfer will be subject to a formal agreement with those suppliers to ensure protection of your personal data. This includes systems such as Mailchimp for sending emails.
Next of Kin	Only with your consent; or in case of an emergency.
Auditors	Information may be shared with our auditors, on demand.
With your permission we may share information about you for publicity and marketing purposes online, in print and on social media.	

The CTF may contact you after you have left regarding HESA's "Destinations of Leavers from Higher Education" (DLHE) Survey. This is designed to gather data about your career or other activities at the time and the relevance of the course you undertook. If unable to speak to you, CTF is authorised to accept information from a third party such as a near relative. The CTF may use information provided as part of the DLHE questionnaire to assist its programme planning and general development.

Transfer of personal data to other countries

Where data is shared within the UK, or the European Union (EU), the third party will be required to comply with and safeguard the data under the terms of the DPA and appropriate EU regulations.

Your personal information will only be transferred to countries, outside of the EU, whose data protection laws have been assessed as adequate by the European Commission, or where adequate safeguards, such as the EU-US Privacy Shield, are in place.

With your consent, your personal information will be shared with your home church authorities where necessary for admissions, funding or other legitimate oversight procedures, regardless of the destination country.

How long data is kept

We will keep your personal data only as long as is necessary for the purpose(s) for which it was collected, and in accordance with our Data Protection Policy. Data will be securely destroyed when no longer required.

Where you exercise your right to erasure, we will continue to maintain a core set of personal data (name, dates of studying at Westminster College and date of birth) to ensure we do not contact you inadvertently in future, and to maintain your record for archive purposes. We may also need to retain some financial records about you for statutory purposes (e.g. accounting matters).

Your rights

You have the following rights

To be informed	This Privacy Notice provides the information you are entitled to receive
Access	Please contact us if you would like confirmation that your data is being processed and access to your personal data. There is no charge for us providing you with this data and it will usually be provided within a month of the request (unless the request is unfounded or excessive).
Rectification	Please inform us of any data which you would like rectified and we will usually respond within a month of the request. We will pass on the changes to any third parties who need to change their records and let you know this has been done.
Erasure	You may exercise your right to have your personal data erased in a number of circumstances (eg if the data is no longer necessary in relation to the purpose for which it was created or you withdraw your consent). Where possible we will comply with all such requests, though some details are part of the College's permanent records (eg examination results, college photographs) which can not reasonably be deleted.
Restrict processing	You can tell us that we can keep your data but must stop processing it, including preventing future mailings and communications. If possible we will inform any third parties to whom your data has been disclosed of your requirement.
Data portability	Your data is across manual records and a bespoke Access database. We will do our best to provide information in a portable format but it is unlikely that we can create systems to do so.
To object	If we can, we will stop processing your data if you object to processing based on legitimate interests or the performance of a task in the public interest / exercise of official authority (including profiling). We will stop processing your data for direct marketing if you tell us to. We will stop processing your data if you object to processing for purposes of research and statistics.
Not to be subject to automated decision-making including profiling	We do not use any automated decision-making.

We reserve the right to judge what information we must continue to hold to be able to fulfil our contract with you. You have the right to lodge a complaint with the Information Commissioner's Office at <https://ico.org.uk/concerns>.

Further information

The controller for your personal data and our Data Protection Lead is the Bursar of Westminster College who can be contacted via gdp@westminster.cam.ac.uk or Westminster College, Madingley Road, Cambridge, CB3 0AA.

Our Data Protection Lead is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data. Please contact us at gdp@westminster.cam.ac.uk if you have any concerns or questions about the above information or you wish to ask us not to process your personal data for particular purposes or to erase your data. Where you have specific requests relating to how we manage your data, we will endeavour to resolve these, but please note that there may be circumstances where we cannot comply with specific requests.

We will publish on our website any changes we make to this data protection statement and notify you by other communication channels where appropriate.

If you have any concerns about your personal data held by the Cambridge Theological Federation you will need to contact them separately by emailing general-enquiries@theofed.cam.ac.uk