

# How we use your personal information

## -- *Senior members of the College*

This statement explains how Fitzwilliam College (“the College”, “we” and “our”) handles and uses information we collect about the senior members (“you” and “your”) of the College. For these purposes, “senior members” is intended to include Fellows (Classes A-E, Honorary and Visiting), Bye-Fellows, College Officers, Supervisors of Studies, Research Associates, Visiting Scholars, Members and Associate Members. In broad terms, we use your data to manage your membership of the College and how we support you, as well as other statutory requirements.

When changes are made to this statement, we will publish the updated version on our website at <https://www.fitz.cam.ac.uk/about/official-information/data-protection> and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal data is Fitzwilliam College, Storeys Way, Cambridge, CB3 0DG. The person responsible for data protection within the College 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 College Data Protection Officer, who is the Bursar, [bursar@fitz.cam.ac.uk](mailto:bursar@fitz.cam.ac.uk). The statutory 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](mailto:college.dpo@ois.cam.ac.uk)]. The Bursar should be contacted if you have any concerns about how the College is managing your personal data, or if you require advice on how to exercise your rights as outlined in this statement. If you are still dissatisfied after the College’s response, you should contact the statutory Data Protection Officer.

Unless otherwise stated, the legal basis for processing your personal data is that it is necessary for your membership of the College or for statutory purposes (e.g. maintaining the public register of Charity Trustees). 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.

This statement should be read in conjunction with the separate statement for Employees, workers and casual workers and contractors, which explains how we use your data to manage your paid work for the College including your role and the performance of it, how we support you as an employer and how you are paid as well as related statutory requirements. It should also be read in conjunction with the separate statements for Library users and website users. All of these statements are available at <https://www.fitz.cam.ac.uk/about/official-information/data-protection>.

### **How your information is used by the College**

Data marked with an \* below relate to information provided by you, or created in discussion and agreement with you. Other data and information is generated by the College or, where self-evident, provided by a third party.

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

A. supporting your membership of the College:

*Personal data may include, where relevant:*

- i) \* personal details, including name, contact details (phone, email, postal, both work and personal), biographical details and photograph;*
- ii) your current and any previous role or membership descriptions;*
- iii) any previous contracts of employment with the College and related correspondence;*
- iv) any occupational health assessments and medical information you have provided, and related work requirements;*
- v) \* your recruitment information (including your original application form, and associated information submitted at that time);*
- vi) other data relating to your recruitment (including your offer of membership and related correspondence, references we took up on your appointment, and any pre-membership assessment of you);*
- vii) \* evidence of your right of residence in the UK (e.g. copies of your passport).*
- viii) \* records of your induction programme and its completion;*
- ix) data submitted by you or created by us to support renewal of your membership;*
- x) records, where they exist, of any investigation or review into your conduct or performance;*
- xi) correspondence between you and the College, and between members and staff of the College, regarding any matters relating to your membership and any related issues (including but not limited to changes to duties, responsibilities and benefits, your retirement, resignation or exit from the College and personal and professional references provided by the College to you or a third party at your request).*

B. maintaining the governance of the College, in compliance with regulatory requirements:

*Personal data may include, where relevant:*

- i) \* your declarations of eligibility to be a Trustee;*
- ii) \* a register of your interests;*
- iii) Minutes and records of College meetings (which include date, time and place of meeting and a list of attendees);*
- iv) records of absences (including but not limited to short leave, sabbatical leave, sickness leave, parental leave and compassionate leave).*

C. administering your membership of the College where it carries stipends, expenses, benefits or fees :

*Personal data may include, where relevant:*

- i) \* your bank details;*
- ii) \* details of your preferred pension scheme;*
- iii) your current and previous stipend and other earnings, and the amounts you have paid in statutory taxes;*
- iv) your allowances and expenses, and any fees you incur;*
- v) correspondence between you and the College, and between members and staff of the College, relating to your benefits and other remuneration;*
- vi) \* records of your performance appraisals;*
- vii) \* your preferences regarding the provision of accommodation and catering facilities*

*In addition, we maintain records of your use or take-up of any benefit schemes provided by us (e.g. dining rights, housing support, allowances), which we collate and monitor to review the effectiveness of these benefits. The legal basis for this processing is that it is in our legitimate interest to ensure that any benefit schemes represent good value for money to both you and us, and to ensure that you do not overuse your entitlements.*

D. publicising your successes in the College's communications and to promote the College's academic successes and public engagement:

We retain personal information on your activities and accomplishments (provided by you or the University of Cambridge, or created by us) for publication in the College promotional materials, publications (online, in print and/or web-based media), reports to donors, College members and/or alumnae/i, and on the College website.

Where this information is published it will include your name, subject and status within the College and may include your photograph. We will make our best endeavour to seek your consent before such publication. If you have concerns about us publishing these details, please speak to the College's Communications Officer.

Where your membership is linked to an award made by an external sponsor, we may share details about you and your achievements with them.

E. maintaining an emergency contact point for you:

*Personal data may include details of your preferred emergency contact, including their name, relationship to you and their contact details.\**

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.

F. monitoring equality and diversity within the College:

*\*Personal data for this purpose may include information relating to your age, nationality, gender and ethnicity. Information relating to your religion or beliefs, ethnicity or disability may also be collected for equality monitoring purposes.*

G. disclosing personal information about you to external organisations, as permitted or required by law. This includes obligations to provide information to the University of Cambridge which are established under the Statutes and Ordinances of the University and/or the College. For Trustees, it also includes your inclusion on the Trustee Register with the Charity Commission and on the list of Trustees in the College's Annual Statutory Accounts.

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 would not monitor social media sites for any personal data relating to you, unless we believed there was a legitimate interest for us to do so (e.g. monitoring compliance with an agreed plan, such as a homeworking agreement) and only if we inform you we might do this in advance. Consequently, we do not routinely screen your social media profiles but, if aspects of these are brought to our attention and give rise to concerns about your conduct, we may need to consider them. Our social media guidelines are available at: <http://www.fitz.cam.ac.uk/about/official-information>.

We operate CCTV on our sites, which will capture footage. Our CCTV policy can be viewed at <https://www.fitz.cam.ac.uk/about/official-information/data-protection>. Data relating to the use of electronic cards (SALTO) to access certain areas of College is retained for one year.

You should also familiarise yourself with the College's Filming & Photography on College Premises Policy at <http://www.fitz.cam.ac.uk/about/official-information>.

We may use the Disclosure and Barring Services (DBS) and Disclosure Scotland to help assess your suitability for certain positions of trust. If this is the case, we will make this clear to you in separate correspondence. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information. We recognise that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

## Who we share your data with

We may publish (within College, on our website and in College/University publications: online, in print and/or web-based media) your name, photograph (if you have provided one for this purpose), your email and College contact phone number and basic biographical information relating to your College and University posts. If you have concerns about us publishing these details, please speak to the College's Communications Officer.

We share your personal data where necessary and appropriate across the collegiate University. The University and its partners (including all of the Colleges) have a data-sharing protocol to govern the sharing of data about staff of the College. This is necessary because they are distinct legal entities. The parties may share any of the above categories of personal information, and the agreement can be viewed in full at <https://www.ois.cam.ac.uk/policies-and-protocols/data-sharing-protocols>. Any transmission of information between partners is managed through agreed processes that comply with UK data protection legislation. We share with the University details of elections to, and resignations from, Fellowships (of all types) and Bye-Fellowships, and your name and education details (BA/MA/PhD etc) are published on election and annually thereafter in *The Reporter*.

Please also note the University's people search function may also be widened to be accessible to the general public by changing the settings at <http://www.lookup.cam.ac.uk/self>: its default setting is otherwise access to all members of the University and all Colleges: we share this because we believe it helps significantly in building community relations and networks and helps others get in touch with you easily.

We share relevant personal data with our sub-contracting agents (eg health and safety, benefits providers) and with relevant government agencies (e.g. HMRC or the Charity Commission), local government authorities, your pension provider and our legal advisers, where necessary, and 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.

Information is not shared with other third parties without your consent, other than your name, role and College contact details which are made publicly available. Generally, personal data is not shared outside of the European Economic Area.

## How long we keep your data for

The College publishes a data retention schedule at <https://www.fitz.cam.ac.uk/about/official-information/data-protection> Retention periods for certain categories of information are determined by legal requirements relating to that specific information.

We hold all information for the duration of your membership of the College and for no more than twelve months after the cessation of your membership. After that time we store your data in the permanent College Archives for the lifetime of the College. In addition, we will hold updated contact details and any references we write subsequent to your membership.

The following information will normally be destroyed seven years after the cessation of your membership:

- I your bank details\*, pension contributions and the amounts you have paid in statutory taxes;
- II \* records of your performance appraisals;
- III records, where they exist, of any investigation or review into your conduct or performance;
- IV \* any special category data about you, such as health-related data;
- V any references we have written.

Those marked with an \* relate to information provided by you, or created in discussion and agreement with you.

We reserve the right to retain the personal data longer than the periods stated above, where it becomes apparent that there is a need to do so – for example, in the event of a major health or personal injury incident, records may need to be kept for up to forty years.

### **Your rights**

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data 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.

### **Non-compliance or Complaints**

Failure to provide the information reasonably required of you may result in disciplinary action taken by the College, which could ultimately lead to termination of your membership.

If you have questions or concerns about your personal information, or how it is used, please speak to the relevant College staff in the first instance. If you need further guidance, please contact the College Data Protection Officer using the details given above.

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

*Last updated: 14 November 2019*