



Wadham College Privacy Notice: Further information current students and applicants who have accepted an offer from the College

This document provides further details for current students and applicants who have accepted an offer from the College on the ways that their personal data is processed by the College. It forms part of, and should be read in conjunction with, the privacy notice of Wadham College, available on the [College's GDPR webpage](#).

Below is the further information for the relevant sections in the master Privacy notice (section number provided in brackets).

1. How we obtain your data (Section 5)

Data that we hold on you may come from different sources: we might receive it from you; we might create it ourselves, or we might receive it from a third party.

Categories of data that we collect, store and use include (but are not limited to):

Provided by you

- Your personal details such as name, date of birth, gender identity.
- Information about your health and/or disabilities.
- Other information such as dietary requirements ethnicity, health, religion or philosophical beliefs and/or sexuality that you disclose to us.
- Passport and visa records confirming eligibility to study in the UK.
- Data in connection with applications for financial support.
- Information required for degree ceremony bookings.

Generated by us, the University of Oxford, or other third parties

- Application data that becomes part of your student file such as your school or previous educational establishments or employers if they provide references to us;
- Your course of study, student status, dates of attendance, course of study, examination results, research records for graduate students, awards, scholarships and prizes conferred, final award, photograph.

- Data that we and our staff generate about you, such as IT records, reports on tutorials and records in connection with your accommodation at Wadham College;
- Financial records including those related to the payment of your fees, accommodation and meals at Wadham;
- The University of Oxford, which operates a number of systems that Colleges have access to, including access to your examination results, fees outstanding, degree ceremony bookings, emergency contact details, student loan status, “right to work” checks and visa information, disability information and reports by supervisors;
- Family members, Fellow students, friends, and other contacts who may provide us with information about you if and when they contact us, or vice versa;
- Other external sources such as funding bodies, GPs or other medical practitioners.

2. Details of our processing activities, including our lawful basis for processing (Section 9)

Data that you provide to us and the possible consequences of you not providing it

Most data that you provide to us is a contractual requirement. If you do not provide us with information that you are contractually obliged to provide, the consequences will depend on the particular circumstances. In some cases we may not be able to provide you with certain services; in other cases, this could result in disciplinary action or the termination of your contract.

Other sources of your data

Apart from the data that you provide to us, we may also process data about you from a range of sources as described under section 1.

Examples of data that we process, either provided by you or generated by others, together with the relevant lawful grounds is provided below.

For the performance of a contract:

- Data that is necessary to the operation of the Wadham College/student contract or to the functioning of Wadham College including:
 - any data about you contained in your assessed work, our assessments of your work and details of any qualifications you are awarded;
 - details of any disciplinary complaints or decisions about you;
 - your contact and accommodation details;
 - any communications you have with us, and any communications we generate about you, for example if you ask us to defer your studies to a later academic year;
 - details of any payments that you make to us, including your bank/payment card details.
- Data you and others sent us when you applied to us (including information sent to us via UCAS and your predicted grades). This includes your academic record and personal statement which we use to assess your application and references;
- Data that we voluntarily provide about you, either whilst you are a student or after you graduate, for example if you ask us for a reference.
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment.

To comply with a legal obligation:

- Where you inform us of a health condition or disability. We will take this information into account when considering whether to make a reasonable adjustment under equality law and in other cases where we are legally required to.
- Information about you that UK immigration law requires us to record or to report to the immigration authorities.
- Information that you voluntarily provide to us about any disabilities or health conditions you have, and about your age, ethnicity, gender, religion and belief, and/or sexual orientation. We will process this as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.

Legitimate Interests:

Some data is processed for the purposes of our or someone else's **legitimate interests**, except where overridden by your data protection rights and freedoms. This includes:

- Data on scholarships and prizes. The College has a legitimate interest in making awards and awarding scholarships and prizes to students, and in fulfilling the wishes of its benefactors.
- Records of attendance at and participation in College Committee meetings. The College has a legitimate interest in having student representatives on certain committees, and it is necessary to process your data for those committees to function properly.
- Emergency contact details. The College and its students have a legitimate interest in the College being able to contact someone you nominate for emergency situations.
- Data provided to Endsleigh Insurance to validate the residency status of students in College accommodation in order to expedite the claims process and ensure that Endsleigh treats students as existing or past policyholders when they contact the company directly.

Consent:

Information that appears in marketing and outreach materials, such as photographs and quotations about your experience.

Performance of a task in the public interest:

This includes areas where the College must comply with its statutory obligations concerning equality and to make reasonable adjustments. An example would be requests for assistance with academic matters, such as applications for special examination arrangements, requests for extensions to written work and submission of extenuating circumstances.

Where Special Category data or data relating to criminal convictions or allegations is processed, this will be as set out in section six and seven of the Privacy notice.

3. How long we keep your data (Section 12)

We retain your personal information for as long as necessary to fulfil the purposes for which it was collected, including for the purpose of satisfying any legal, accounting or reporting requirements.

The retention period, will depend on the category of the data. As a general guide, our expected retention periods are as follows:

Expected retention period	Data
Three months after you cease to be a registered student	Email
Twelve months	Computer information (log-in information, internet use records, device details)
One year following the end of the academic year in which you ceased to be a registered student	Records relating to your accommodation
Six years following the end of the academic year in which you ceased to be a registered student unless a subsequent complaint or appeal has arisen, in which case the retention period will be six years from conclusion of the case.	The following data will be removed as far as possible and practicable: Data relating to your admission unless this is on your application form. Where not on an application form, details of personal life including health, family/financial circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs. Self-assessment questionnaires. Emergency contact details. Medical and other records relating to requests for suspension or extenuating circumstances for examinations. Welfare records relating to support and counselling unless these form medical records to be retained in line with NHS guidelines and policy. Disciplinary, harassment and grievance records and those relating to criminal convictions will be reviewed at this point and removed unless there is a legal requirement or other lawful grounds for further retention.
Seven years following the end of the financial year in which you ceased to be a registered student	Financial records including those related to your fees, bursars and any financial support.
Seven years following the incident	Records relating to information security incidents and PC misuse.
Fifteen years following the end of the academic year in which you ceased to be a registered student	References we provide for you.
Permanent	Core student record including: Name, date of birth, gender, application form and references, student status, dates of attendance including any periods of suspension of studies, academic records including course of study and outcome of your studies, examination results, research records for graduate students, awards, scholarships and prizes conferred, student photo.
Permanent	Records of College cultural life: photographs and written records of teams, choirs, clubs and societies, plays and performances, participation in events and sporting fixtures
Permanent	Records of attendance at and participation in College Committee meetings. Papers, including anonymised statistics used for equality access and other reporting, received by Governing Body or other College Committees or published in related reports. Data in the Tutorial list and College Gazette.

4. Contact details (Section 3)

If you have any questions on the above information or other queries about your data, please contact the Academic Administrator.

Email: admin@wadham.ox.ac.uk; Tel: (01865) 277946

A full record of our processing activity is available on request from the Data Protection Officer at Wadham College.

Data Protection Officer, Wadham College, Parks Road, Oxford OX1 3PN

Email: data.protection@wadham.ox.ac.uk; Tel: (01865) 277900

5. Revision History

Version	Date	Changes & Approvals
0.1	20 May 2018	Draft for Discussion
0.2	21 May 2018	Incorporating comments from GDPR Advisor, HR Manager, Academic Records Manager
0.3	21 May 2018	Amended by Academic Records Manager
0.4	21 May 2018	Formatting changes & minor amendment to intro
0.5	23 May 2018	Incorporating comments from Finance Committee
1.0	23 May 2018	Approved for publication by Governing Body
2.0	21 Jan 2019	Envisaged retention for references provided by the College amended
3.0	19 Aug 2020	Addition of data processing relating to Endsleigh Insurance. Envisaged retention of welfare records amended in line with University retention schedule.