

Privacy notice for Students

How we use your personal information

Reviewed: June 2024

This statement explains how The Cambridge Theological Federation (“the CTF”, “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 CTF (“you” and “your”). In broad terms, we use your personal information to ensure we meet our obligations to you, and others, for courses of study we provide for you. This includes guiding and supporting your academic studies, maintaining and reviewing your academic progress and pastoral welfare, and reviewing your financial commitments to the CTF.

This statement also applies to sabbatical visitors and others granted temporary membership of the CTF or given access to its resources, except for staff for whom a separate statement exists.

The CTF offers degrees validated by the University of Cambridge, Anglia Ruskin University and Durham University. In this statement “the University” refers to whichever of these institutions validates the degree programme you have been admitted to.

Most CTF students are also members of one of the member institutions of the CTF (a “House”). In this statement “House” will also be taken to include Chung Chi College in the Chinese University of Hong Kong.

Each University and House is a separate legal entity to the CTF and have their own statements about your personal information and their procedures. They in turn share information with a number of other bodies for statutory and other purposes.

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 Cambridge Theological Federation, The Bounds, Westminster College, Lady Margaret Road, Cambridge, England, CB3 0BJ. 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 Head of Central Services, head@theofed.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 CTF and the expectations on both sides during your course of studies). We have commitments to other external bodies, particularly the University and your House 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, reporting to government bodies), 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 CTF

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 CTF, your House, the University and elsewhere;
- C. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in CTF, House and University life (including any support needs that are, or have been, provided by the CTF, the House or the University during your course of studies), as well as information about your general health and wellbeing, where appropriate;
- D. maintaining financial records relating to your studies, your funding and other financial support arrangements;
- E. provision of references to third parties;
- F. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
- G. maintaining a record of any complaints you make to the CTF and their outcomes;
- H. reporting to church bodies that sponsor your education, as appropriate.
- I. access to libraries.
- J. maintaining data to enable the CTF, your House and the University to produce statistics and research for internal and statutory reporting purposes.
- K. ensuring you have the right to study in the UK.

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 speak to the Head of Central Services.

Please note that if you engage with us for any other purpose (e.g. you work 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.

The CTF has adopted the data retention schedule of the University of Cambridge, which you can access at www.information-compliance.admin.cam.ac.uk/records-management. This schedule applies to our data retention regardless of your course of study.

How we share your personal information

Within the CTF

All **staff** employed by the CTF to work in the Bounds House office (with the exception of cleaning staff) have access to all personal data held by the CTF on its servers (except employment-related files which are have restricted access).

We share relevant information with people **teaching** CTF students, which may include information about your application and its supporting documents, the modules you take, the results of assessments, your attendance records and any disciplinary matters, including any suspected or actual plagiarism.

We share relevant information with **committee members**, as required, including the Board and delegated committees.

We share relevant information with our external **accountants**, Bidwells, and with our **external auditors**, Chater Allan.

This information sharing is considered necessary for the CTF to operate smoothly. You can request a greater level of privacy by contacting the Federation office but not all requests will be able to be met if we are to fulfil our contract with you.

With the University

We share data with the University that validates your degree. The academic and student support arrangements between the CTF and the University are complex and varied depending on your course and level of study. Information relating to you (and particularly your academic studies) is shared routinely with the University, and the University and its partners (including the CTF) have a data sharing agreement to govern such interactions and information transfers in both directions.

The personal information shared with the University 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 CTF to fulfill its obligations and agreements with the University.

With your House

CTF students who are also members of a House will normally have applied through a House to study with the CTF. Information relating to you (and particularly your academic studies) is shared on application and routinely thereafter with the CTF and the University. There is a data sharing agreement to govern such interactions and information transfers in both directions.

The personal information shared with your House 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 CTF to fulfill its obligations and agreements with the House.

With other organisations

The CTF routinely shares information with, and receives information from your funding providers or sponsors, as agreed with them and/or you, including the Student Loans Company, where appropriate.

We may also be subject to a legal requirement (with or without your consent) to share your personal information with some government agencies both routinely and 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 CTF will notify you of its intention to share information relating to such special circumstances 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 or 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 CTF may share information with organisations overseas as part of arrangements related to your membership of the CTF (e.g. an overseas funding provider). In most cases, this will be related to the operation of a contract.

Other organisations we may share your data with include:

- Higher Education Statistics Agency (see www.hesa.ac.uk/about/regulation/data-protection)
- The providers of any external learning or training placements
- Relevant Government Departments (e.g. Department for Business, Innovation and Skills, Home Office, Foreign and Commonwealth Office, Department of Health, Department for Education)
- Relevant executive agencies or non-departmental public bodies (e.g. UK Visas and Immigration, HM Revenue and Customs, the Health and Safety Executive)
- The Office for Students (OfS)
- Higher Education Funding Council for England (HEFCE)
- Universities and Colleges Admissions Service (UCAS)
- Office for Fair Access (OFFA)
- Office of the Independent Adjudicator (OIA)
- The Federation Student Forum
- The organisation(s) running the National Student Survey
- Providers of anti-plagiarism software
- Any relevant professional or statutory regulatory bodies (e.g. Ministry Division, your sponsoring church)
- Local authorities (In particular, we pass lists of students to the City Council annually to assist with the administration of students' exemption from Council Tax.)
- The police and similar law enforcement agencies

Publication of your personal information

Your basic contact details (name, email address and House) will be made available through our internal online directory. Other than this, we would not normally make your personal information publicly available without your consent.

We encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

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 CTF staff in the first instance. If you need further guidance, please contact the Head of Central Services 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/>).

*Agreed at Federation Management Committee on 10th April 2018
Reviewed by Board in June 2024*

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, your House or by the University, 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.
- v) Immigration status of overseas students eg visa and passport information

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 CTF, your House, the University and elsewhere:

We retain personal information (provided by you, your House or by the University, 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 CTF (including supervisions, examinations and other academic support);
- iii) records of your academic qualifications (including those prior to becoming a member of the CTF);
- iv) 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.

C. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in CTF, House and University life (including any support needs that are, or have been, provided by the CTF, your House or the University during your course of studies), as well as information about your general health and wellbeing:

We retain personal information (provided by you, your House or by the University, 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 CTF 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.

D. maintaining financial records relating to your studies, your funding and other financial support arrangements:

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

- i) records of your sources of funding support and tuition fee liabilities as well as what monies are to be, and have been, collected by the CTF or your House on behalf of itself and the University;
- ii) records of any financial support agreed by the CTF, your House, the University or external agencies, including church sponsorship bodies.
- iii) where appropriate, your banking details in order to conduct financial transactions, and records of such transactions;
- iv) records of your CTF financial account, including balance and transactions;
- v) 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.

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:

- i) records of your advisers, including where relevant your Tutor, Director of Studies and other nominated 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 CTF 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 your House or the University into your conduct or behaviour.

The CTF has several complaints procedures, relating to different matters, which you are expected to familiarise yourself with and, in all cases, personal information will be managed as confidentially as possible. 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.

G. maintaining a record of any complaints you make to the CTF and their outcomes:

We retain personal information (provided by you or by others, or created by us), including:

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

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

H. Reporting to Church bodies

If your study with the CTF is part of ordination training we retain personal information (provided by you, your church, your House or by the University, or created by us), including that listed in A to G above so that we can provide the reports required by them.

I. Access to Libraries

We retain personal information (provided by you) to give access to University and House libraries including, on application, to the libraries of the University of Cambridge.

- i) Name, date of birth, course, course end date, whether you are on an undergraduate or postgraduate course.

J. Maintaining data to enable the CTF, your House 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 CTF, your House or the University;
- ii) information relating to your rights to live, work and study in the United Kingdom;
- iii) any criminal record that may affect your status as a student of the University or the Federation;
- iv) information about what you do after you leave.

K. Ensuring you have the right to study in the UK

We retain a copy of your passport and, where relevant, your visa so that we can prove that you have the right to study in the UK and that we have checked you have.

If you have concerns or queries about any of these purposes, please contact us, or speak to the Head of Central Services.