

Privacy Notice for pupils, parents, guardians, teachers and school staff involved in access and outreach programmes

RESPONSIBLE COMMITTEE: General Purposes Committee

RESPONSIBLE OFFICER: Principal Bursar

LINKED DOCUMENTS: **Data protection Policy**

Annual Review date: First meeting of Hilary Term

This privacy notice applies to pupils, parents, guardians, teachers and school staff involved in the college's access and outreach programmes

You should note that:

1. A separate notice applies to users of our website, which explains how we monitor usage of our website. You can find that notice [here](#).
2. For prospective applicants and attendees at open days, a separate notice is available [here](#).
3. For school students and pupils participating in access and outreach activities that we or the University organise aimed at encouraging participation in higher education, an additional privacy notice concerning data entered into the Higher Education Access Tracker (HEAT) is available [here](#).
4. For school students and prospective applicants using The Access Platform a separate notice is available [here](#).
5. For attendees of activities or events at the College, a further notice applies, which is available [here](#).

A summary of what this notice explains

St John's College is committed to protecting the privacy and security of personal data.

This notice explains what personal data St John's College holds about you, how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it.

For the parts of your personal data that you supply to us to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes we use your data for where your consent is needed.

What is your personal data and how does the law regulate our use of it?

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”. It can include information such as your name, contact details, education history and other information about you that we may process.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

The law requires us:

- To process your data in a lawful, fair and transparent way;
- To only collect your data for explicit and legitimate purposes;
- To only collect data that is relevant, and limited to the purpose(s) we have told you about;
- To ensure that your data is accurate and up to date;
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about;
- To ensure that appropriate security measures are used to protect your data.

St John's College Contact Details

If you need to contact us about your data, please contact:

The Data Protection Officer
St John's College,
Oxford
OX1 3JP

data.protection@sjc.ox.ac.uk



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

If you do not provide us with information that we ask for:

If you are a teacher or member of school staff involved in an access or outreach programme, it may mean that you or your school cannot take part in our programmes, depending on the type of information we requested.

If you are a participant or prospective participant in our access and outreach programmes, it may mean that you cannot enrol on or take part in our programmes or events, depending on the type of information we requested.

If you are a parent or guardian of a participant or prospective participant in our access and outreach programmes, it may mean that your child cannot enrol on or take part in our programmes or events, depending on the type of information we requested.

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. These include:

- Your current or previous school or educational establishments, if they contact us about your involvement in our programmes, or if you have given explicit consent for specific data to be shared;
- Your family members, guardians, friends, and other contacts who may provide us with information about you if and when they contact us, or vice versa. If you are under 18 and are a participant, or a parent/guardian of a participant in our access and outreach programmes, this also includes data that we request when parental consent is required.

The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data on the following lawful grounds:

- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those legitimate interests.

- Where it is necessary to take steps at your request prior to entering a contract;
- Where necessary to comply with a legal obligation;

We may also use your data, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent. Where you are aged under 18, we may ask your parent or guardian for their consent also, or for other relevant information required for you to take part safely in our programmes.

How we apply further protection in the case of "Special Categories" of personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

The Special Categories of personal data consist of data revealing:

- racial or ethnic origin;
- political opinions;
- religious or philosophical beliefs;
- trade union membership.

They also consist of the processing of:

- genetic data;
- biometric data (e.g. fingerprints) for the purpose of uniquely identifying someone;
- data concerning health;
- data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, and further conditions are met;
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the data public.

Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Details of our processing activities, including our lawful basis for processing

We have prepared a detailed [table](#) setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on.

The table includes detailed information about how and why we process various categories of data if you are a **teacher or member of school staff**:

- For the purpose of advertising, administering and evaluating our events and programmes, we will process various information on the lawful basis that we have a legitimate interest in processing:
 - details of which programmes or events you or your school participate in,
 - your contact details and details of your position within your school,
 - relevant dietary, access, or medical requirements, if you will be attending an event hosted by the college,
 - your responses to evaluation surveys and questionnaires.
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment. We both have a legitimate interest in processing such data for this purpose.
- We may also collect data such as your contact details from other school staff or pupils, where this is required to administer your, or your school or pupils', participation in our programmes, for instance to verify information provided by pupils in an application to participate in our programmes.



If you are a **participant or prospective participant in our access and outreach programmes**:

- For the purpose of administering, tracking and evaluating your participation (or application to participate), we will process various information on the lawful basis that we have a legitimate interest in processing:
 - details of the programmes or events you participate in or are applying for,
 - your personal details, including your contact details, address, demographic data, education history, predicted grades,
 - relevant dietary, access, or medical requirements, if you will be attending an event hosted by the college,
 - your responses to evaluation surveys and questionnaires.
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment. We both have a legitimate interest in processing such data for this purpose.
- We may also collect specific data from your schools, teachers, parents or guardians, where you have given permission for data to be collected, or where this is required to administer your participation in our programmes.
- With your consent, data will also be shared with the Higher Education Access Tracker (HEAT), to enable us to monitor and evaluate our programmes, and to track participants in access and outreach activities. A separate privacy notice for HEAT can be found [here](#).

If you are a **parent or guardian**:

- For the purpose of administering and evaluating our events and programmes, we will process various information on the lawful basis that we have a legitimate interest in processing:
 - your contact details and details of your relationship to participants or prospective participants in our programmes,
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment. We both have a legitimate interest in processing such data for this purpose.

- We may also request your data from your child, where this is required to contact you to obtain consent for participation in our access and outreach activities.

How we share your data

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example:

- where we decide to report alleged criminal misconduct to the police

It also includes disclosures where the third party is an agent or service provider appointed by St John's College to enable us to operate effectively, provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data. All our third party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third party providers to use your personal data for their own purposes.

More information on the categories of recipients of your data is set out in a table [here](#).

How long we keep your data

The detailed table of processing activities explains how long we will keep your data.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used;
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed;
- The **right to have your personal data erased** in certain circumstances;
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).



- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.
- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed [table of processing activities](#).
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the College's Data Protection Officer.

Further guidance on your rights is available from the Information Commissioner's Office (<https://ico.org.uk/>). You may also wish to contact the College's Data Protection Officer if you are considering how or whether to exercise your rights.

You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office if you believe that your data has been processed unlawfully.

Future changes to this privacy notice, and previous versions

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, or to make the College's or the University's operations and procedures more efficient. If the change is material, we will give you not less than two months' notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by email or in writing.



HISTORY

<i>Date of GB approval</i>	<i>Brief summary of changes</i>	<i>Confirmation that linked documents have updated if necessary</i>	<i>College policy register updated</i>
Apr 2022	Generation of privacy notice. Reviewed and approved by GB	Confirmed	(Iris Burke)
HT 2023			