

Pembroke College

Data Protection Policy October 2001

The information and guidelines within this policy are important and apply to the entire College Community: the Master, Fellows and all staff and students (referred to collectively as the “College Community” in this policy). Non-compliance may result in disciplinary action.

Introduction

Like all educational establishments, the College holds and processes information about its employees, applicants, students, alumni and other individuals for various purposes (for example the administration of the admissions process, the effective provision of academic and welfare services, to record academic progress, to operate the payroll and to enable correspondence and communications, including the provision of references and certificates). To comply with the Data Protection Act 1998 (“the 1998 Act”), information must be collected and used fairly, stored safely and not disclosed to any unauthorised person.

Notification to the Information Commissioner

The College has an obligation as a Data Controller to notify the Information Commissioner (formerly called the Data Protection Registrar) of the purposes for which it processes personal data. Individual data subjects can obtain full details of the College’s data protection registration/notification with the Information Commissioner from the College Data Protection Officer or from the Information Commissioner’s website (<http://www.dataprotection.gov.uk>).

Data Protection Principles

The College, as a Data Controller, must comply with the Data Protection Principles which are set out in the 1998 Act. In summary these state that personal data shall:

- Be processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for specified and lawful purposes and shall not be processed in any manner incompatible with those purposes.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for those purposes.
- Be processed in accordance with the data subject’s rights under the 1998 Act.
- Be the subject of appropriate technical and organisational measures against unauthorised or unlawful processing, accidental loss or destruction.
- Not be transferred to a country outside the European Economic Area, unless that country or territory has equivalent levels of protection for personal data.

Processing

“Processing”, in relation to information or data, means obtaining, recording or holding the information or data, or carrying out any operation or set of operations on the information or data, including:

- a) organisation, adaptation or alteration of the information or data
- b) retrieval, consultation or use of the information or data
- c) disclosure of the information or data by transmission, dissemination or otherwise making available, or
- d) alignment, combination, blocking, erasure or destruction of the information or data.

Data Protection Officer

The College Data Protection Officer is the Tutor. All queries about the College policy and all requests for access to personal data should be addressed to the Data Protection Officer (see “Right to Access Personal Data” below).

Responsibilities of individual Data Users

All members of the College Community who record and/or process personal data in any form (called “Data Users” in this policy) must ensure that they comply with the requirements of the 1998 Act (including the Data Protection Principles) and with the College’s data protection policy (including any procedures and guidelines which may be issued from time to time). A breach of the 1998 Act and/or the College’s data protection policy may result in disciplinary proceedings.

In particular, no member of the College Community may, without the prior written authorisation of the Data Protection Officer:

- a) develop a new computer system for processing personal data;
- b) use an existing computer system to process personal data for a new purpose;
- c) create a new manual filing system containing personal data;
- d) use an existing manual filing system containing personal data for a new purpose.

The above does not apply to databases which are maintained by individual Data Users within the College Community for their private domestic uses, for example, private address books. However, individual Data Users should consider whether their private domestic uses fall within the scope of the 1998 Act.

“Data Areas” and “Data Area Contacts”

To aid the efficient administration of the College’s data protection policy, the data which the College holds/processes has been divided into a number of “Data Areas”: these are described below, showing who may have access to the data. In each case, there is also specified a “Data Area Contact”.

He or she will be responsible in relation to the data in the Data Area in question (and thus not simply for the files which he or she maintains) for the following:

- informing the Data Protection Officer of proposed processing of personal data within the College which may need to be notified to the Data Protection Commissioner;
- providing personal data to the Data Protection Officer in response to a subject access request when requested to do so by the Data Protection Officer; and
- maintaining the security of, and access to, personal data within the Data Area.

The Data Protection Officer may from time to time designate other Data Areas and/or Data Area Contacts.

Data Areas

- Tutorial files

Tutorial files are maintained in respect of students’ academic progress and welfare. They may also contain financial and medical data. The purpose for which they are maintained include the relevant student’s applications for employment, professional training or admission to other educational establishments.

Current Tutorial files are to be kept by the Tutor, Assistant Tutors and the relevant Director of Studies. Tutorial files may be consulted on a day-to-day basis by the Master, the Tutor, Assistant Tutors, the student’s own Director of Studies, and/or their staff. All other requests for access to a Tutorial file must be authorised by the Tutor or the relevant Director of Studies.

Data Area Contact: The Tutor

- Admissions files

Admissions files are maintained in respect of candidates for admissions. During the admissions process such files are maintained and kept by the Tutor, the Admissions Tutor and their staff. For successful candidates, the admissions documentation is included in a Tutorial file. For unsuccessful candidates, the admissions documentation is archived for subsequent research into the admissions process. During the admissions process, admissions files may be consulted by the Tutor, any of the Admissions Tutors, any Director of Studies and any other interviewers, and their staff. All other requests for access to an Admissions file must be authorised by either of the Admissions Tutors or the Tutor.

Data Area Contact: The Tutor

- Files relating to loans and grants made by the College to students

These are maintained and kept by the Tutor, the Assistant Tutor of the student in question, and the Tutorial Bursar, and their staff. These files may be consulted on a day-to-day basis by the Tutor, the students' Assistant Tutor, the Tutorial Bursar, their staff and any of the staff in the Accounts Office. All other requests for access to any of these files must be authorised by either the Tutor or the Tutorial Bursar.

Data Area Contact: The Tutor

- Files in respect of any disciplinary matters involving students

All such files are to be maintained and kept by the Tutor, or his secretary, and the relevant Assistant Tutor, who may each consult the same on a day-to-day basis. All other requests for access must be authorised by the Tutor.

Data Area Contact: The Tutor

- Medical files in respect of student health and welfare

Medical files are to be maintained and kept by the College nurse, who may consult the same on a day-to-day basis. All other requests for access to medical files must be authorised by the College nurse.

Data Area Contact: College Nurse

- Medical notes in respect of students

Such notes are maintained by the Tutor for Health & Safety reasons, to assist in meeting the needs of students with disabilities, or for reasons connected with absences from College, poor performance, applications to the University or to charities etc.

All current notes in this category are to be kept by the Tutor. The notes may be consulted on a day-to-day basis by the Tutor and his staff and by the relevant Assistant Tutor. All other requests for access to these notes must be authorised by the Tutor.

Data Area Contact: The Tutor

- Personnel Files in respect of Fellows

These are maintained and kept by the Master. These files may be consulted on a day-to-day basis by the Master and his staff. All other requests for access to any of these files must be authorised by the Tutor or Master as appropriate.

Data Area Contact: The Tutor

- Files relating to loans and allowances for Fellows

These are maintained and kept by the Bursar, the Finance Manager and their staff, who may each consult the same on a day-to-day basis. All other requests for access to any of these files must be authorised by the Bursar or the Finance Manager.

Data Area Contact: The Bursar

- Personnel Files in respect of other employed staff of the College

These are maintained and kept by the Human Resources Manager. These files may be consulted on a day-to-day basis by the Human Resources Manager, the Bursar, and their respective staff. All other requests for access to these files must be authorised by the Human Resources Manager.

Data Area Contact: The Human Resources Manager

- Files relating to tenancies of College properties, suppliers of goods and services to the College, and other third parties not otherwise dealt with in this policy document

These are maintained and kept by the Bursar, the Human Resources Manager and their respective staff, who may each consult the same on a day-to-day basis. All other requests for access must be authorised by the Bursar or the Human Resources Manager.

Data Area Contact: The Bursar

- Computer Databases

Certain of the files referred to above are maintained in electronic databases as well as or instead of paper files. Access to such databases is restricted in the same manner as access to paper files in the relevant Data Area.

In addition, however, the IT Manager, and members of the College's IT Department and the CASC team may have day-to-day access to the electronic databases for the purposes of administering and maintaining the same.

Data Area Contact: The IT Manager

Data Security and Disclosure

All members of the College Community are responsible for ensuring that:

- any personal data which they hold is kept securely.
- personal data is not disclosed either orally or in writing or otherwise to any unauthorised third party, and that every reasonable effort will be made to see that data is not disclosed accidentally.

Unauthorised disclosure is a disciplinary matter and may be considered gross misconduct. If in any doubt, consult the College Data Protection Officer.

Personal data must be kept securely and examples of how this may be done will include:

- keeping the data locked in a filing cabinet, drawer or room; or
- if the data is computerised, ensuring that the data is password protected or kept only on disk which is itself kept securely; or
- any other appropriate security measure.

Candidates' and Junior Members' obligations

Candidates and Junior Members must ensure that any personal data provided to the College is accurate and up to date. They must ensure that any changes of address or other personal details are notified to

one of the Admissions Tutors or their staff in the case of candidates or the Tutor in the case of Junior Members.

Junior Members must comply with the College's Computing Regulations.

Data Subjects' Consent

Certain types of personal data may be processed for particular purposes without the consent of individual data subjects. However, it is the College's policy to seek express consent whenever practicable from individual data subjects for the main ways in which the College may hold and process personal data concerning them. This is to allow individuals an opportunity to raise any objections to any intended processing of personal data. The College will consider any such objections but reserves the right to process personal data in order to carry out its functions as permitted by law.

Therefore, all prospective Fellows, staff, admissions candidates and students will be asked to sign a consent form regarding particular types of information which the College may in due course hold/process about them. Existing Fellows, staff and students will also be asked to sign a consent form.

The consent forms for admissions and student records and for Fellows' and staff records are set out in the Schedule to this policy.

Right to Access Personal Data

Staff, students and other individuals have the right under the 1998 Act to access any personal data that is being held about them either in an "automatically processable form" (mainly computer records) or in a "relevant filing system" (i.e. any set of information structured in such a way that specific information relating to a particular individual is readily accessible) and to request the correction of such data where they are incorrect. An individual who wishes to exercise his/her right of access is asked to complete the College "Access to Personal Data" form which is available from the Tutorial Office and give it to the College's Data Protection Officer.

Any inaccuracies in data disclosed in this way should be communicated immediately to the Data Protection Officer who shall take appropriate steps to make the necessary amendments.

The College will make a charge of £10 (or such other charge as is permitted from time to time by the Data Protection Act 1998) on each occasion that access is requested and this fee should accompany the Access to Personal Data form. In accordance with the 1998 Act, the College reserves the right to refuse repeated requests where a reasonable period has not elapsed between requests.

The College will normally respond to the request for access to personal data within 40 days (including bank holidays and weekends) of the request or payment of the fee, whichever is the later.

The provisions of the 1998 Act and individuals' access rights will not come into effect fully until 23 October 2007. The Freedom of Information Act 2000 gives individuals extended rights of access in certain circumstances to information which is not held on computer or in a relevant filing system.

Please contact the Data Protection Officer for further information.

Disclosure outside of the European Economic Area

The College may, from time to time, desire to transfer personal data to countries or territories outside of the European Economic Area in accordance with purposes made known to individual data subjects. For example, the names and contact details at the College of members of staff on a website may constitute a transfer of personal data world wide. Accordingly, the consent form signifies an individual's consent to the inclusion of such data on an authorised College website. If an individual wishes to raise an objection to this disclosure then written notice should be given to the Tutor.

Other personal data, even if it would otherwise constitute fair processing, must not, unless certain exemptions apply or protective measures are taken, be disclosed or transferred outside the EEA to a country or territory which does not ensure an adequate level of protection for the rights and freedoms of data subjects.

Sensitive Personal Data

The College may from time to time process “sensitive personal data” relating to admissions candidates, members and staff of the College.

“Sensitive personal data” is information as to a data subject’s racial or ethnic origin, political opinions, religious beliefs or beliefs of a similar nature, trade union membership, physical or mental health or condition, sexual life, offences or alleged offences, and information relating to any proceedings for offences committed or allegedly committed by the data subject, including the outcome of those proceedings.

Currently, the College envisages the need to process sensitive personal data of a type specified in the consent forms set out in Schedule to this policy for the purposes specified. For example, data relating to the ethnic origin of members or staff of the College may be processed for the purposes of equal opportunities monitoring or to identify any necessary dietary requirements and possible sources of financial assistance. Medical records need to be processed for the provision of healthcare and general welfare, to identify any necessary dietary and accommodation requirements and to assist in meeting the needs of members of the College Community with disabilities. In exceptional circumstances, the College may need to process information regarding criminal convictions or alleged offences in connection, for example, with any disciplinary proceedings or other legal obligations.

In other circumstances, where sensitive personal data is to be held or processed, the College will seek the explicit consent of the member of the College Community in question unless one of the limited exemptions provided in the Data Protection Act 1998 applies (such as to perform a legal duty regarding employees or to protect the data subject’s or a third party’s vital interests).

CCTV

The College operates a number of CCTV cameras in order to assist with security for members of the College Community and in respect of College property. Members of the College Community who have any queries regarding the operation of the CCTV system should speak to the Bursar. Members of the College Community who wish to access any personal data about themselves on the CCTV system should complete and return an Access to Personal Data form (with the requisite £10 fee) with as much information as possible to enable the data to be located (including, if possible, details of the relevant camera, date and time).

Email

It is permissible and appropriate for the College to keep records of internal communications which are relevant to an individual’s ongoing relationship with the College, whether as a Fellow, member of staff or student, including information concerning performance and conduct issues, provided such records comply with the Data Protection principles.

It is recognised that email is used for such communications and that such emails should form part of the College’s records. It goes beyond the scope of this policy document to address the appropriate use of email in the proper functioning of the College, and the limitations and legal implications with this mode of communication. However, all members of the College Community need to be aware that:

- the 1998 Act applies to emails which contain personal data about individuals which are sent or received by members of the College Community (other than for their own private purposes as opposed to College purposes);
- subject to certain exceptions, individual data subjects will be entitled to make a data subject access request and have access to emails which contain personal data concerning them, provided that the individual data subject can provide sufficient information for the College to locate the personal data in the emails; and
- the legislation applies to all emails from and to members of the College Community which are sent and received for College purposes, whether or not the emails are sent through the College email system or on an individual’s own email account.

College Archives

The individual files relating to members of the College Community are the basis of the alumni records and detailed historical archives of the College, and are retained indefinitely for reference and research purposes.

At some point after a member of the College Community leaves the College, his or her file(s) will be transferred (save in the case of a Fellow) to the Tutorial Archive and then (in all cases) to the College's archives. A Fellow's file, once he or she has left the College, will be transferred to the College Archive. The timing for this will differ from Data Area to Data Area, and within each Data Area will depend upon a number of factors.

Thereafter the file(s) may be consulted on a day-to-day basis by (save in the case of a Fellow's file) the Master, the Tutor, the Bursar and Human Resources Manager, and their respective staff. In the case of a Fellow's file it may be consulted on a day-to-day basis by the Master, the Bursar and the Tutor or (in all cases) the College Archivist. The Development Director and Development Office staff may have day-to-day access to archived files for alumni purposes. All other requests for access to any archived file must be authorised by the Master, the Bursar, the Tutor or, as appropriate, the College Archivist.

Personal data which is contained in archived files may be processed for research purposes (including statistical, historical or biographical purposes). Such processing will be carried out in such a manner to comply with the Data Protection Principles (so far as applicable).

Alumni Relations and Development

Manual and computer based files are maintained in respect of current and former Fellows, alumni, and other current, past and potential donors to the College.

All files are to be kept in the locked Development Office; access to the computer database is to be password protected. Development Office staff may consult the manual and computer based files on a day to day basis, but requests by others to view these files must be authorised by the Development Director.

Data will be used by the College for a full range of alumni activities, including the sending of College publications, promotion of benefits and services available to alumni (including those being made available by external organisations), notification of alumni activities and fund raising programmes (which might include an element of direct marketing).

It is intended that non-resident members' contact details will be made available to other current and non-resident members of the College, recognised alumni societies (e.g. Pembroke College Cambridge Society) in the UK and overseas, to sports and other clubs associated with the College, and to agents contracted by the College for particular alumni-related activities.

The Development Office will seek individuals' consent to disclosure of their contact details. If an individual has an objection to other aspects of the processing of their data for alumni or fund raising purposes, then written notice should be given to the Development Director.

Data Area Contact: The Development Director

This policy was adopted by the College on

Schedule:

1. Admissions and Student Records consent form
2. Fellows' and Staff Records consent form

THE DATA PROTECTION ACT 1998: ADMISSIONS AND STUDENT RECORDS

To assist the College to comply with its legal obligations under the Data Protection Act 1998, this form sets out the main purposes for which the College holds, processes and discloses personal data. Full details of the College's notification to the Office of the Information Commissioner (OIC) can be obtained from the Tutor as the College's Data Protection Officer or from the OIC directly. Please would you sign at the end of the form to indicate your consent to the College processing your personal data for the specified purposes. If you object to any of the processing indicated then you should indicate this and your objection will be considered. All students will be issued with the College's data protection policy which contains further guidelines and individuals' obligations. If you have any queries, you should raise them with the Tutor.

The College processes personal data to assist in the admissions process, to enable the provision of education and welfare services to its students, to facilitate the administration of student accommodation, to provide up to date academic records, to assist in the administration and collection of fees and charges, to comply with legal and other obligations (e.g. health & safety), to facilitate communications and mailings, to enable the provision of references, to assist with fund-raising by the College and the University, for alumni activities and for research and archive purposes.

Information is provided by the applicants and students themselves (by way of application forms and other means) and also by third parties such as schools, local authorities and examination boards.

In order to ensure the proper functioning of the College as an institution in the higher education sector, the College may, from time to time, consider it appropriate to disclose relevant personal data about applicants and students within the College to other members of staff, committees and organisations (such as the Junior Parlour and the Graduate Parlour), and also to various external bodies, including the College Visitor, appropriate members of staff of the University of Cambridge, other Cambridge Colleges, inter-collegiate bodies, other educational institutions, employers and potential employers, professional bodies, funding bodies, local authorities and other governmental and regulatory bodies. The College may or may not seek further consent to specific disclosures depending upon the intended disclosure.

To assist in inter-collegiate and University activities, it is the College's policy to:

- provide the University with a complete list of Resident Members (surname and initials) at the start of each academic year which will subsequently be published in the University's Resident Members book
- to publish a list of new resident members (surname and initials) in the annual Pembroke College Cambridge Society Gazette and the names of students (surname and initials) who have distinguished themselves
- to provide the room number of students and their email address to bona fide members of the University of Cambridge upon enquiry, but not to others. Students should inform visitors accordingly. If students wish such details not be given out in these circumstances then they should inform the Data Protection Officer in writing accordingly.

In addition, the College may need to process certain categories of "sensitive personal data" and your signature on this form indicates your explicit consent to the processing of sensitive personal data as set out below:

Medical records and data – to assist in providing healthcare and student welfare, to assist in meeting the needs of students with disabilities, to assist with any dietary and accommodation requirements, and to provide appropriate educational services. Any medical information provided to the College nurse by, or about a student, shall be held in accordance with the principles of medical confidentiality.

The applicant/student hereby gives explicit consent for any information which he/she provides to the College or a member of College staff about his/her medical condition to be disclosed to the College Nurse and the Tutor (and other members of College staff as the Tutor considers necessary), but such personal data shall not be disclosed outside the College, except with the student's explicit consent to

the proposed disclosure or in other circumstances required or permitted by law (for example, to protect the vital interests of the student or another person). The College may inform the student's "emergency contact" of necessary medical information in such circumstances.

Ethnic Origin – the College may also process information provided by a student about his/her ethnic origin for the purposes of equal opportunity monitoring, but only in an anonymous form, and may disclose such statistics to external bodies. The College shall not otherwise disclose any information about a student's ethnic origin without the explicit consent of the student to the proposed disclosure or as otherwise required or permitted by law.

Criminal Records – to protect other members of the College Community and the University, to operate a proper disciplinary procedure, to assist with the provision of references and to comply with any legal obligations. The College may receive information about a student's criminal record or allegations of a criminal offence from the student or from external sources, such as the police or the Criminal Records Bureau.

Subject to the requirements of the Rehabilitation of Offenders Act 1974 and the prior specific authorisation of the College Data Protection Officer, the applicant/student hereby gives his/her explicit consent to the disclosure of information about his/her criminal offences or allegations of criminal offences to appropriate staff within the College, to appropriate staff or officers of the University of Cambridge and to appropriate staff or officers of other Colleges within the University of Cambridge.

The College may also be obliged by law to disclose information about a student's criminal offences or allegations of criminal offences to other external bodies, such as the police, in certain circumstances. The College may also be permitted by law to disclose such information to other external bodies without the student's explicit consent in other circumstances (for example where the proposed disclosure is necessary to protect the vital interests of another person).

I confirm that I consent to the College processing and disclosing relevant personal data as set out above, including the processing of sensitive personal data for the purposes specified.

I attach a document with any objections to the processing of my personal data [] *please tick if applicable.*

.....(signed).....(dated)

THE DATA PROTECTION ACT 1998: FELLOWS' AND STAFF RECORDS

To assist the College to comply with its legal obligations under the Data Protection Act 1998, this form sets out the main purposes for which the College holds, processes and discloses personal data. Full details of the College's notification to the Office of the Information Commissioner (OIC) can be obtained from the Tutor as the College's Data Protection Officer or from the OIC directly. Please would you sign at the end of the form to indicate your consent to the College processing your personal data for the specified purposes. If you object to any of the processing indicated then you should indicate this and your objection will be considered. All Fellows and staff will be issued with the College's data protection policy which contains further guidelines and individuals' obligations. If you have any queries, you should raise them with the Tutor.

The College processes personal data for purposes in connection with an individual's membership of or employment with the College, to enable the operation of the payroll, to facilitate the administration of accommodation, to comply with legal and other obligations (e.g. health & safety), to facilitate communications and mailings, to enable the provision of references, to assist with fund raising by the College and University, for alumni activities, to assist with pensions administration and for research and archive purposes. This may include disclosing personal data to other authorised Fellows or members of staff of the College.

The College may, from time to time, where the processing is necessary for the performance of the individual's duties or the proper functioning of the College, consider it appropriate to disclose relevant personal data to external bodies, including the College Visitor, members of staff of the University of Cambridge, other Cambridge Colleges, inter-collegiate bodies, other educational institutions, other employers and potential employers, professional bodies, funding bodies, local authorities and other governmental and regulatory bodies. The College may or may not seek further consent to specific disclosures depending upon the intended disclosure.

In order to assist the proper functioning of the College, the College may, with the consent of the individual concerned, provide or publish Fellows' and employees' name and title, College telephone number, College address, email address, and appropriate information about their College duties, whether in hard copy and electronic directories, upon enquiry or on such websites as are approved by the College from time to time. Any objection to giving out such details in these circumstances should be given to the Data Protection Officer in writing accordingly.

In addition, the College may need to process certain categories of "sensitive personal data" and your signature on this form indicates your explicit consent to the processing of sensitive personal data as set out below:

Medical records and data – to keep proper sickness records, to assist in providing healthcare and staff welfare, to facilitate obligations pursuant to disabilities legislation and to assist with any dietary and accommodation requirements. Any medical information provided to the College nurse by or about a Fellow or member of staff shall be held in accordance with the principles of medical confidentiality.

The Fellow/member of staff hereby gives explicit consent for any information which he/she provides to the College or a member of College staff about his/her medical condition to be disclosed to the College Nurse and the Human Resources Manager (and other Fellows/members of College staff as the Human Resources Manager considers necessary), but such personal data shall not be disclosed outside the College, except with the Fellow's/member of staff's explicit consent to the proposed disclosure or in other circumstances required or permitted by law (for example, to protect the vital interests of the Fellow/member of staff). The College may inform the Fellow/member of staff's "emergency contact" of necessary medical information in such circumstances.

Ethnic Origin – the College may also process information provided by a Fellow/member of staff about his/her ethnic origin for the purposes of equal opportunity monitoring, but only in an anonymous form, and may disclose such statistics to external bodies. The College shall not otherwise disclose any

information about a Fellow's/member of staff's ethnic origin without the explicit consent of the Fellow/member of staff to the proposed disclosure or as otherwise required or permitted by law.

Criminal Records – to protect other members of the College Community and the University, to operate a proper disciplinary procedure, to assist with the provision of references and to comply with any legal obligations. The College may receive information about a Fellow's/member of staff's criminal record or allegations of a criminal offence from the Fellow/member of staff or from external sources, such as the police and the Criminal Records Bureau.

Subject to the requirements of the Rehabilitation of Offenders Act 1974 and the prior specific authorisation of the College Data Protection Officer, the Fellow/member of staff hereby gives his/her explicit consent to the disclosure of information about his/her criminal offences or allegations of criminal offences to other appropriate Fellows/staff within the College, to appropriate staff or officers of the University of Cambridge, to appropriate staff or officers of other Colleges within the University of Cambridge.

The College may also be obliged by law to disclose information about a Fellow's/member of staff's criminal offences or allegations of criminal offences to other external bodies, such as the police, in certain circumstances. The College may also be permitted by law to disclose such information to other external bodies without the Fellow's/member of staff's explicit consent in other circumstances (for example where the proposed disclosure is necessary to protect the vital interests of another person).

I confirm that I consent to the College processing and disclosing relevant personal data as set out above, including the processing of sensitive personal data for the purposes specified.

I attach a document with any objections to the processing of my personal data [] *please tick if applicable.*

.....(signed).....(dated)