

Table outlining how your data may be shared (April 2020)

Please note: This document is a work in progress. Whilst it has already been subject to a thorough review, there will be some further revisions and additions.

ID.	Whose data?	Who we share your data with	Data recipient location	What do we send and why do we share it?	Is the recipient outside of the EU?	Basis/safeguards/derogations for transfer outside the EU
1	Students	University of Oxford	UK	<p>Admissions data (including student applications and qualifications), examination results, payments of fees and collection of debts. We also provide information about financial support you receive. We also inform the University of any decisions that you tell us about regarding your course, such as options you wish to take, or if you decide to change or withdraw from your course, intermit or suspend your studies. Records of any decisions we make about your wishes, such as whether to allow you to take options, change your course or suspend your studies.</p> <p>Your data is shared to allow the University and Colleges to work together in providing admissions decisions, making decisions about your course and in administering examinations, assessments and collect fees, and to avoid duplication of effort in areas where the University and Colleges have a common interest. Information about financial support is provided to allow the University to complete its data return to the Higher Education Statistics Agency, which is a regulatory requirement on the University.</p> <p>We also share data with the University to enable it to comply with its duties as a tier 4 sponsor, for example to verify student attendance in accordance with UKVI requirements.</p> <p>With your consent, we may also transfer data concerning your health, disabilities or welfare if it is appropriate to make a request to the University (for example to make a reasonable adjustment).</p>	No	
2	Students	Sponsors	UK and overseas	<p>The College will share information with your sponsor(s) in accordance with the terms of relevant contract(s)/agreement with you and your sponsor. This data is likely to relate to attendance and academic progress. This may include international transfer of data where the sponsor is based overseas. Sponsors can be employers, parents or other third parties.</p>	Yes No	<p>Necessary for performance of contract in data subject's interests Transfer within the EU</p>
3	Students	Loan and financial support providers (including the Student Loans Company)	UK and overseas	<p>We share information relating to the payment of student fees with educational loan providers, such as the Student Loans Company, where this is required under the terms of the funding arrangement, or otherwise at your request. This is for the purposes of confirming your identity, enrolment and attendance. We may also be required to share information relating to intermission or illness in order to facilitate financial support. Your data is shared to facilitate payment of tuition fee and maintenance loans and the provision of other financial support including bursaries.</p> <p>Where you are a recipient of funding originating from overseas bodies, we may be requested or required to provide information to those bodies in relation to you.</p>	Yes No	<p>Adequacy decision Explicit consent Necessary for performance of contract in data subject's interests Safeguards under Art 49(1) second sub paragraph Transfer within the EU</p>
4	Staff	Mortgage providers and letting agencies	UK	<p>Where you have applied for a mortgage or at the start of a new tenancy, we may release information to relevant organisations on your request to verify your employment and salary.</p>	No	
5	Students	GP practices	UK	<p>We share basic information with GP practices, on your request, to ensure that you are registered with a local GP during your time at Oxford.</p>	No	

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6	Students Staff	Potential employers or education providers	UK and overseas	We will only send your data to employers or education providers that you have approached. We share your data for the purposes of confirming your qualifications and/or employment history with us and providing references. Depending on where you have applied, these recipients may be outside of the EU.	Yes No	Explicit consent Transfer within the EU
7	Students Staff	Relatives, guardians, or representatives of the data subject	UK and overseas	We may wish to contact your next of kin, guardians or emergency contact in cases of emergency. Decisions to contact these individuals will be made in consideration of your rights and freedoms.	Yes No	Adequacy decision Explicit consent Transfer for data subject's vital interests Transfer within the EU
8	Students Staff Nursery users	Local government council tax departments	UK	We will share data relating to your student status with relevant local government departments for the purposes of council tax exemption, assessment and/or collection. We also share data relating to staff living in College-owned accommodation with the local authority for council tax purposes.	No	
9	Students	Electoral Registration Officers	UK	We share data such as your name, address and nationality, to enable the ERO to contact you regarding eligibility to vote in general, local and European elections.	No	
10	Students Staff Anyone else we have dealings with	Legal advisers	UK	If circumstances require it, we may share your data with our legal advisers for the purposes of obtaining privileged and confidential legal advice relating to the College's relationship with you.	No	
11	Students Staff Anyone else we have dealings with	UK agencies with duties relating to the prevention and detection of crime, apprehension and prosecution of offenders, collection of tax or duty, safeguarding, or national security.	UK	We may share your data with government departments, crime prevention and law enforcement agencies when required or considered appropriate in the circumstances and with the proper consideration of your rights and freedoms. Organisations we may share your data with include the Police and UK Visas and Immigration.	No	
12	Staff Donors	HM Revenue & Customs	UK	Employee identification and payroll information relating to the payment of National Insurance and Income Tax will be shared with HMRC in line with our obligations as an employer. Gift aid information provided by donors will be shared to enable gift aid to be claimed.	No	
13	Staff	Home Office, UK Visas and Immigration	UK	We may be required to share your data with the Home Office or the UK Visas and Immigration agency as part of our obligations as a visa sponsor for any overseas staff.	No	

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14	Staff, spouses, civil partners, dependents and other beneficiaries of staff.	Universities Superannuation Scheme (USS) or other pension provider	UK	<p>We will share the data necessary for pension payments to your pension fund or provider. This may include details of:</p> <p>(a) death in service benefit nominations;</p> <p>(b) health information about you (as a result of incapacity retirement benefit);</p> <p>(c) information about your spousal or other relationships which might identify your sexuality;</p> <p>(d) absence information, which might allow the reverse engineering of trade union affiliation in the case of strike absences.</p> <p>We will only process such data when it is necessary for carrying out obligations and exercising specific rights of either you as a member of the pension scheme, or of the College, in the fields of employment, social security or social protection law.</p>	No	
15	Students Staff	Disclosure and Barring Service (DBS)	UK	In order to apply for a DBS check, if you are engaged in an activity which involves contact with children or vulnerable adults or where the College considers a criminal records check is required. You will be notified in advance of any requirement to carry out a DBS check.	No	
16	Students Staff Potential Applicants	Third party software suppliers	UK		Potentially, some third-party suppliers may use sub-processors outside the EU	Adequacy decision Documented in appropriate contracts Safeguards under Art 49(1) second sub paragraph Transfer within the EU
17	Alumni and non-alumni friends Donors Students	Third party suppliers providing alumni and fundraising related services	UK	<p>Any transfers to recipients of this type will only take place provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data.</p> <p>The College may share alumni and non-alumni information with data processors to provide alumni relations services and fundraising services. This may include printers and mail houses for alumni communications, fundraising communications, third party software providers, and fundraising consultants.</p>	No	
18	Students Staff Alumni Donors Anyone else we have dealings with	Auditors	UK	If auditors wish to inspect College records, this may require them to have access to your data for the purpose of conducting their audit. Any audit will be conducted pursuant to an agreement with the College which includes provisions to protect your data from misuse.	No	
20	Students Staff Anyone else we have dealings with	Bodies with responsibility for the regulation and resolution of issues within the higher education sector, including the Office of the Independent Adjudicator and the Office for Students	UK	To comply with regulatory requirements.	No	

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21	Students Staff Anyone else we have dealings with	Emergency, medical and similar services personnel	UK	Where necessary to protect your vital interests, or those of another person, we may disclose your personal data to appropriate third parties.	No	Transfer for data subject's vital interests
22	Students Staff	Next of kin	UK or overseas	Should a situation arise where it would be appropriate, in our reasonable opinion, to use the next of kin details that you have provided to us, we will disclose to your next of kin such of your personal data as is warranted by the situation.	Yes No	Adequacy decision Explicit consent Safeguards under Art 49(1) second sub paragraph Transfer within the EU
23	Staff	Occupational Health providers	UK	Where an occupational health referral is made we will share your contact details with the provider, as well as appropriate details to enable the provider to conduct its assessment.	No	
24	Staff	Bodies tasked with assessment and or grading of teaching and research outputs, including but not limited to those involved in the Teaching Excellence Framework and the Research Excellence Framework	UK	We submit details of your teaching and research outputs and assessments, plus ancillary data to show that you meet the qualifying criteria for consideration by relevant panels.	No	
25	Graduate Student Out Tutors/Graduate Students doing academic work for the academic office	The Conference of Colleges (who will share this data with other Oxford Colleges)	UK	We share right to work checks for Graduate Student Out Tutors, as out tutoring work is often conducted at several colleges. We share your title, first name, surname, single sign on user name, tutor subject, College, date checked, confirmation of your permanent right to work, immigration status, student status and location of right to work documents (noting the document that was checked and where it is held) with the Conference of Colleges and other Colleges.	No	

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26	Students	Conference of Colleges and the Conference of Colleges Appeal Tribunal	UK	If you lodge an appeal with the Conference of Colleges Appeal Tribunal, we will share your data with the Conference of Colleges and the Tribunal (which is administered by the Conference of Colleges). The data we share will be necessary for the appeal process and pursuant to the Tribunal's published procedure.	No	
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27	Alumni and non-alumni friends Donors Students	University of Oxford and other Colleges and Permanent Private Halls of the University. Third-parties working on our behalf.	UK and Overseas	We may need to share your personal data within the collegiate University or with third-parties working on our behalf, in appropriate circumstances, by secure means, and with the relevant data sharing agreements in place. We do not, and will not, sell your data. Third parties will only process your personal data on our instructions for specified purposes and where they have agreed to treat your data confidentially and to keep it secure. They cannot use your personal data for their own purposes nor to keep your data after the processing is complete. They are required to take appropriate security measures to protect your personal information in line with our policies. We share the minimum amount of information necessary to fulfil the purpose, this includes the use of anonymised or pseudonymised data where sufficient. Your data may be shared in appropriate circumstances, in the following ways: Within the collegiate University via the Development and Alumni Relations System (DARS) to improve our mutual understanding of the multiple relationships you have across the collegiate University to provide you with the best possible experience. With college or University Sports Clubs and Societies where you are (or were) a member of that club or society. With organisations or individuals affiliated to Keble College including volunteers, recognised University or college alumni societies and networks. With partner organisations that accept gifts in support of Keble College. The following organisations enable tax-efficient giving to Keble College and the collegiate University of Oxford, from outside of the UK. Data may be shared by us with these organisations where it relates specifically to donations you have made, or have pledged to donate via these organisations: Americans for Oxford, Inc. (AFO), Swiss Friends of Oxford (SFOU), German Friends of Oxford University. With third-party organisations engaged by Keble College to provide services: including but are not limited to: mailing houses, printers, event organisers or venues, organisations providing tools such as relationship- or event-management systems, databases and reporting/analysis tools, alumni networking or crowdfunding platforms, email or survey tools, payment services (e.g. direct debit, online donation processing); organisations assisting with activities such as market research, marketing and communications, organisational effectiveness, strategy and planning, auditing, business intelligence and analysis, customer experience.	Yes / No	Transfers outside of the EEA will only take place if one of the following applies: <ul style="list-style-type: none"> • the country receiving the data is considered by the EU to provide an adequate level of data protection • the organisation receiving the data is covered by an arrangement recognised by the EU as providing an adequate standard of data protection e.g. transfers to companies that are certified under the EU US Privacy Shield • the transfer is governed by approved contractual clauses • the transfer has your consent • the transfer is necessary for the performance of a contract with you or to take steps requested by you prior to entering into that contract • the transfer is necessary for the performance of a contract with another person, which is in your interests • the transfer is necessary in order to protect your vital interests or of those of other persons, where you or other persons are incapable of giving consent • the transfer is necessary for the exercise of legal claims • the transfer is necessary for important reasons of public interest
28	Students Staff Anyone else we have dealings with	External helpdesk provider	Overseas	3rd party helpdesk software provider. Email correspondence relating solely to IT support tickets. Data content is not shared with the provider, but is stored on their systems. The provider is ensuring that, where data is stored outside the EU, suitable protections are in place as well as providing a means for enabling the right to be forgotten.	Yes and/or No	
29	Students	Photographers	UK	Names of matriculands and graduands are provided to formal photographers prior to matriculation and graduation ceremonies, to enable name keys to be produced for group photographs.	No	
30	Staff	External Training Providers	UK and Overseas	The data provided depends on the requirements of the training provider. Typically, it might include <ul style="list-style-type: none"> - Name of the person who booked the course - Name of the person who attended (where different) - Course attended - Contact details provided - Where a certificate has been issued, a delegate name - Course outcome We share this data to facilitate training courses and to ensure staff have the training they require for their respective positions.	Yes and/or No	Adequacy decision Transfer within the EU