

**Keble College GDPR ROPA - Applicants and Prospective Students - v1.4 (April 2020)**

Category of personal data	Source of the data	Why we process it	How long we keep this data	Our lawful basis for processing	Details relating to lawful basis (where applicable)	Special category grounds	Special category- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)
We may assist students making visa applications before they arrive, and making visa extensions when they are on the course. This involves us taking copies of passports and visas, which we store electronically and share with the University so that it has records of students' entitlement to study. We also provide the University with students' name, date of birth, passport number, course, fees paid & due for it to share this information with the Home Office/UK Visas and Immigration as part of its reporting obligations under immigration law.	We obtain this data from you We generate this data about you	Overseas students need visas in order to attend university.	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	Processing is necessary for performance of our contract with you;  Processing is necessary for compliance with a legal obligation		Explicit consent - data provided by the applicant as part of the application process, necessary for legal compliance.			
Records about whether to invite applicants for interview, including consideration of contextual information (relating to information about your school performance, postcode and care background), test scores and marks for written work that we have requested. We will also hold copies of the tests and written work that you submit.	We obtain this data from the University of Oxford We generate this data about you We also obtain this data from you	We process this data to decide who to invite for interview.  The role of contextual admissions data is explained more fully on the University's website, but is taken into account when deciding whether to invite applicants for interview in addition to candidates who have met the usual departmental admissions criteria: <a href="https://www.ox.ac.uk/admissions/">https://www.ox.ac.uk/admissions/</a>	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in using appropriate data about academic performance, and to take account of the context of academic achievement in order to decide who to invite for interview.				

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		undergraduate/applying-to-oxford/decisions/contextual-data?wssl=1	Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.						
Pre-application communications with prospective students.	We obtain this data from you We generate this data about you	To answer queries that you may have about studying at the College.	For 12 months after the end of the current academic year.	Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in receiving and responding to a range of queries from prospective students.				
Your fee status (e.g. home, EU, or international) and associated information about your country of residence, the amount of your fees and funding information including your financial declaration, any supporting information you provide about funding (e.g. loans, grants, sponsorship and/or self-funding resources, including copies of evidence you submit) and decisions that we make in light of that information.  The evidence	We obtain this data from you We obtain this data from third parties (e.g. parents).	In order to determine the fees you are required to pay and to confirm that you will be able to meet the requirement to pay fees.	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for compliance with a legal obligation	Legislation determines to an extent the level of fees you are required to pay, based on your country of residence.				

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submitted by you or on your behalf may include financial information about those assisting you financially, for example parents' bank statements.  We may also share this data with the University.									
Sensitive data that you provide during the application process, consisting of information about your ethnicity, disabilities, special needs, dietary requirements (whether for health or religious reasons), and records of any criminal convictions that you inform us about. Records of our decisions taking this information into account.	We obtain this data from the University of Oxford We obtain this data from you	We process this data in order to consider whether to make reasonable adjustments (in the case of information about your disability and/or health), to implement them and for equality monitoring purposes.  In the case of criminal convictions, the College and University will use this data to consider and make decisions about whether any conviction poses an unacceptable risk in the collegiate university environment.	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms  Processing is necessary for compliance with a legal obligation	The College has a legitimate interest in assessing whether any individual poses an unacceptable safety risk.	Substantial public interest under the UK Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010 . The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments.  The processing must be carried out without consent so as not to prejudice those purposes.	The processing meets a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where the College processes criminal convictions/allegations data for these purposes, the processing is necessary for the prevention of a breach of its obligations under health and safety law . The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning health and safety.  The processing must be carried out without consent so as not to prejudice those purposes.

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Records of our admissions decisions, including decision letters that we send to applicants, notes of your interview performance, feedback we provide you on your application, records of the offers we make, records of whether you accept the offer, and where you do, records of whether you meet the conditions of the offer and records of whether you enrol at the College. We also receive details of equivalent decisions by the University department that you apply to.	We obtain this data from the University of Oxford We generate this data about you	To make admissions decisions and inform you of the outcome.	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in administering applications and deciding who should be offered places.				
Information you provide to us or the University of Oxford during the application process, including with your UCAS and graduate application forms consisting of your name, intended course, preferred Colleges, contact details, gender identity, education and employment history, predicted grades, language proficiency, personal statement, references and any research proposal or written work that you submit	We obtain this data from the University of Oxford	To make admission decisions.	Successful applicants who enrol:  UCAS and graduate application forms, and notification of scholarships received will form part of the core student record retained permanently as part of the College archive. Supporting documentation and communications will be disposed of 6 years after the end of the academic year you cease to be a registered student.  Unsuccessful applicants: for 12 months after the end	Processing is necessary in order to take steps at your request prior to entering a contract  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in administering applications and deciding who should be offered places.				

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during the application process.			of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.						
Organisational and administrative records pertaining to the scheduling and organisation of interviews, including accommodation.	We obtain this data from you.  We generate this data about you	To make admission decisions.	Completion of admissions process + 1 year (though longer retention periods may be required for deferred applications)	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms	The College has a legitimate interest in administering applications and deciding who should be offered places.	Substantial public interest under the UK Data Protection Act 2018	Where the College processes special category data for these purposes, the processing is necessary for the prevention of a breach of its obligations under the Equality Act 2010 and/or under health and safety legislation. The processing is necessary for reasons of substantial public interest, namely that the College must comply with its statutory obligations concerning equality and to make reasonable adjustments, and to comply with its health and safety obligations. The processing is also necessary for the exercise of a protective function.		

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Feedback received pertaining to to open days, school visits (in-bound and outbound), and access and outreach events with external partners	We obtain this data from you	In order to improve access and outreach activities	For one year after the end of the relevant academic year	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in processing this data so that it may improve the access and outreach activities in which it participates				
Organisational and administrative records pertaining to open days, school visits (in-bound and outbound), and access and outreach events with external partners. Includes names and contact details of organisers and visitors.	We obtain this data from you  We generate this data about you  We obtain this data from third parties	In order to organise and facilitate access and outreach activities	For three years after the end of the relevant academic year	Processing is necessary for the performance of a task carried out in the public interest;  Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	The College has a legitimate interest in processing this data so that it may recruit from the widest range of backgrounds.				
Prospective student information that appears in marketing and outreach materials, such as photographs of individual students or a group of such identifiable individuals, and quotations about their experience, records of any students that participate in outreach activity.	We obtain this data from you	To promote the College to potential applicants.	Permanently.  Student information may be transferred to College archives for purposes in the public interest, or for historical research purposes as a record of College life.	You (or your parent) have given your consent to the processing for one or more specific purposes					
Data gathered for the HEAT database during outreach activities - includes name, gender, data of birth, ethnicity	We obtain this data from you. We obtain this data from the University of Oxford.	Monitoring and evaluating the effectiveness of our outreach programmes; producing statistics, including event application and	College copies of HEAT data are destroyed immediately after the data is entered into the system. An explanation of what is held on HEAT and for	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights	The College has a legitimate interest in ensuring that people from a range of backgrounds have the opportunity to attend the College.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for equality of opportunity or treatment purposes in accordance with the conditions and safeguards specified in the Data Protection		

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		participation numbers, and participant outcomes; and tracking future outcomes of event participants, including applications to the University and other Higher Education Institutions.	how long it is retained on that system is available here: <a href="http://www.ox.ac.uk/admissions/undergraduate/increasing-access/heatprivacynotice">http://www.ox.ac.uk/admissions/undergraduate/increasing-access/heatprivacynotice</a> and <a href="https://heat.ac.uk/data-privacy-participants/">https://heat.ac.uk/data-privacy-participants/</a>	and freedoms;  Processing is necessary for compliance with a legal obligation.  Processing is necessary for tasks that we carry out in the public interest (promoting and widening access to Higher Education).	Under relevant legislation the University is required to adhere to the agreement it has with the Office for Fair Access / Office for Students, which includes the use of contextual data in the undergraduate admissions process.		Act 2018, with a view to promoting or maintaining such equality.		
Applications for and decisions about financial support, for example scholarships, bursaries and hardship funds. This includes communications that we send and receive to third parties that provide financial support.	We obtain this data from you;  We generate this data about you;  We may receive decisions from third parties that provide financial support.	In order to make decisions about financial support and to ensure that the College is encouraging and supporting participation by talented people from all backgrounds.	Successful applicants who enrol: for 6 years after the end of the academic year when you cease to be a registered student, but if you are awarded a scholarship this will remain on your record permanently as part of the College archive.  Unsuccessful applicants: for 12 months after the end of the application cycle.  Successful applicants who do not enrol: 12 months after the last date when you could have enrolled.	You have given your consent to the processing for one or more specific purposes.					



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Accident reports records containing information about the date and nature of the accident, who was involved, their home address, who witnessed it and any steps taken concerning it. Health and safety records.	We generate this data about you	So that we have a record of accidents occurring on College premises. In some cases the College also has a legal obligation to record and report accidents to the relevant regulatory authority.	40 years after last entry	Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms;  The processing is necessary for compliance with a legal obligation.	The College has a legitimate interest in creating and retaining records of accidents on College premises to assist with its management of health and safety risks.  In some cases the College is obliged to record and report accidents under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013.	Substantial public interest under the UK Data Protection Act 2018	The processing is necessary for the protection of members of the public from any potential health and safety risks, and must be carried out without the consent of the individual so as not to prejudice such protection.  Processing to record and report relevant accidents is (where a legal obligation is imposed on the College) in the substantial public interest and pursuant to the exercise of a function conferred on a person by an enactment.		
Name, email address, nationality, school name, postcode, date of birth of prospective applicants using The Access Platform embedded in the Keble Website. Also the content of messages between Keble student ambassadors and prospective applicants which is likely to involve the following sorts of information: questions and answers about - life at university, Keble College, University of Oxford, courses, admissions process,	Messages from prospective applicants to Keble student ambassadors and personal data provided by prospective applicants when registering to use the service (name, email address etc.)	Name & email address: to enable prospective applicants to use the platform; Name, D.O.B., home postcode & school: to ensure that we're communicating with prospective applicants from under-represented backgrounds in order to comply with the University's Access and Participation Plan with the government.	Content of messages for no longer than one year; name, D.O.B. home postcode, school name will be transferred to the HEAT (Higher Education Access Tracker) database and be retained indefinitely - maintained and reviewed by Undergraduate Admissions and Outreach team.	Processing is necessary for the purposes of your, our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms.	Legitimate interest: in order to meet our Access and Outreach targets that are in line with the University's Access and Participation Plan: <a href="https://academic.adm.in.ox.ac.uk/app">https://academic.adm.in.ox.ac.uk/app</a>	Where prospective applicants provide details of special category data, such as ethnicity during conversations with ambassadors, we process this under consent.			



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preparation for admissions tests and interviews etc. Some conversations might also include reference to special category data such as ethnicity.									