This privacy notice applies to Applicants for office, senior membership and employment

A SUMMARY OF WHAT THIS NOTICE EXPLAINS

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

This notice explains what personal data St Hugh's College ("us" or "we") holds about applicants for office holders, senior membership and employment at St Hugh's College ("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 of data where your consent is needed.

St Hugh's College has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:

1. **current students**
2. **alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives)**
3. **archives (which explains what data we hold in our archive)**
4. **security, maintenance and health and safety (including how we use CCTV)**
5. **website and cookies (including how we monitor use of our website)**
6. **IT systems (including how we monitor internet usage)**

You can access past versions of our privacy notices at https://www.st-hughs.ox.ac.uk/discover/governance/.

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".

Data protection law requires St Hugh's College as data controller for your data:

- 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 HUGH'S CONTACT DETAILS

If you need to contact us about your data, please contact: dpo@st-hughs.ox.ac.uk by telephone on 01865 274913, or by writing to Data Protection Officer, St Hugh's College, Oxford, OX2 6LE.

WHAT PERSONAL DATA WE HOLD ABOUT YOU AND HOW WE USE IT

We may hold and use a range of data about you at different stages of our relationship with you. We might receive this data from you; we might create it ourselves, or we might receive it from someone else (for example if someone provides us with a reference about you).

Categories of data that we collect, store and use include (but are not limited to):

- The contact details that you provide to us, including names, addresses and telephone numbers.
- The position, role, grade, salary and benefits attaching to the relevant role.
- Your application paperwork, including the results of any testing.
- Details of your qualifications and correspondence in relation to them.
- References received about you, as well as the names and contact details of referees.
- Requests for special arrangements and/or waiver of eligibility criteria, including our consideration and decisions in relation to the same.
- Communications with you regarding the outcomes of your application.
- Records of decisions, including relevant committee and panel reports.
- Copies of passports, right to work documents, visas and other immigration data.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Equality monitoring data.

Further categories of data that we hold in relation to current staff, officer holders and senior members are set out in our Record of Processing Activity.

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 purpose(s).

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

- Where it is necessary to perform the contract we have entered into with you;
- Where necessary to comply with a legal obligation;
- Where it is necessary for the performance of a task in the public interest;
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information, 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.

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

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

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 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 information in the following circumstances:

- Where processing is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on St Hugh's College or you in connection with employment, social security or social protection; or
- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:
    - for the exercise of a function conferred on St Hugh's College or anyone else by an enactment or rule of law; or
    - for equal opportunities monitoring;
- 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 appropriate policy documents and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of information 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 information 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

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to applicants for office, senior membership and employment at St Hugh's College are set out in our Record of Processing Activity. Details of retention periods, plus details of parties to whom we transfer data, and on what basis, are available here.

DATA THAT YOU PROVIDE TO US AND THE POSSIBLE CONSEQUENCES OF YOU NOT PROVIDING IT

Most data that you provide to us is processed by us in order that we, and you, can comply with obligations imposed by law. For example:

- Copies of your passport, right to work, and visa information will be collected by us at the time of your application or appointment, and at the point of any change or renewal of immigration status, to enable us to comply with UK Immigration and Visa requirements. We may be required by law to retain that data, along with related information (such as your application paperwork, short-lists and selection committee papers), even where you are not appointed, until a certain point after the person appointed ceases to be employed by St Hugh's College.
- If the relevant role requires regular interactions with children or vulnerable adult, we are required by law to carry out a Disclosure and Barring Service check in relation to you. In accordance with section 124 of the Police Act 1997, DBS certificate information is only passed to those who are authorised to receive it in the course of their duties and, in line with the DBS code of practice, is not kept by St Hugh's College for any longer than is necessary.

Your failure to provide such data may mean that you are unable to take up the relevant role.

Other data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Equality monitoring data, which is requested by the College as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

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:

- Data that we generate about you when processing your application;
- Data generated by the University of Oxford, where the role you have applied for is a joint position offered by both St Hugh's College and the University;
- Your previous educational establishments and/or employers if they provide references to us;

Our Record of Processing Activity indicates the sources of each of the various categories of data that we process.

HOW WE SHARE YOUR DATA

We do not, and 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.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Home Office; UK Visas and Immigration	To fulfil St Hugh's College's obligations as a visa sponsor

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other Colleges and/or PPHs within the University of Oxford, University offices and/or departments	Where you apply for a role shared between different parts of the collegiate university, we may need to share relevant data for the proper functioning of relevant contracts and services.
Third party service providers	To facilitate activities of St Hugh's College. Any transfer will be subject to an appropriate, formal agreement between St Hugh's College and the processor.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

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.

SHARING YOUR DATA OUTSIDE THE EUROPEAN UNION

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no "adequacy decision" by the European Commission, and an alternative safeguard is not available, we may still transfer data to you which is necessary for performance of your contract with us.

Otherwise, we will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

AUTOMATED DECISION-MAKING

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

HOW LONG WE KEEP YOUR DATA

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our Record of Processing Activity.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that St Hugh's College is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our Record of Processing Activity.

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 and exception 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 https://www.st-hughs.ox.ac.uk/discover/governance/ .
- 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**. 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 by email at dpo@st-hughs.ox.ac.uk , or by telephone on 01865 274913.

If you wish to exercise any of your rights in relation to your data as processed by St Hugh's College please contact our Data Protection Officer at dpo@st-hughs.ox.ac.uk. Some of your 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.

Further guidance on your rights is available from the Information Commissioner's Office (https://.ico.org.uk/). You have the right to complain to the UK's supervisory office for data protection, the Information Commissioner's Office at https://ico.org.uk/concerns/ if you believe that your data has been processed unlawfully.

FUTURE CHANGES TO THIS PRIVACY NOTICE

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if the College or the University makes changes to its procedures, or to make St Hugh's College'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.

You can access past versions of our privacy notices at https://www.st-hughs.ox.ac.uk/discover/governance/.

CHANGE LOG

Version	Date changed	Notes
1.0	24/05/2018	Version 1.0 published