St John's College Record of Processing Activity - Staff, office holders and senior members

	Controller										
	Name and contact details		otection Officer (if applicable)	Representative (if applicable)							
Name	St John's College	Name	Principal Bursar	Name							
Address	St Giles, Oxford, OX1 3JP	St Giles, Oxford, OX1 3JP Address		Address							
Email	data.protection@sjc.ox.ac.uk	Email	data.protection@sjc.ox.ac.uk	Email							
Telephone	01865 277321	Telephone	01865 277321	Telephone							

ID.	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- details of public interest etc (where appropriate)	Criminal Conviction Grounds	Criminal conviction grounds (further information)	Category of recipients	Name of third countries or international organisations that personal data are transferred to
1		We obtain this data from you		We retain this information for the length of your employment contract, in order to ensure you are provided with foods meeting your personal requirements. This information will be deleted immediately upon termination of your employment.	for performance of our contract with you		interest under the UK Data Protection Act 2018		N/A		N/A	N/A
2	criteria, and selection committee reports. (Not including criminal conviction data, if	Oxford We obtain this data	a contract of employment with you. Certain parts of the record are also held as part of College compliance with immigration law, and/or entered into the College archive after 6 years.	 2. where the successful applicant is a Tier 2 or Tier 5 visa applicant, sponsored by the College, copies of the following recruitment records (for all shortlisted applicants in the relevant recruitment process) will be kept by the College for the time periods required under UK Visas and Immigration guidance, as amended from time to time: (1) All applications shortlisted for final interview in the medium in which they were received (e.g. emails, application form, cv). (2) The names and total number of applicants short-listed for final interview (3) Notes from the final interviews conducted 	 in order to take steps at your request prior to entering a contract Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's 	management and administration records.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A		N/A	N/A
3			United Kingdom and take steps to meet	These records must be kept for the duration of employment and for a further two years after the University ceases to sponsor the visa holder [Home Office and UK Visas and Immigration retention requirement].		Processing is necessary for compliance with immigration and employment law.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws		N/A		Home Office, UK Visas and Immigration	N/A
4	Appointment records: criminal conviction and Disclosure and Barring Service information.		in making recruitment decisions.	For 6 months following your appointment to the relevant role. Information relating to criminal convictions collected in the course of the recruitment process will be deleted once the DBS check has yielded a satisfactory or unsatisfactory result. DBS certificate information will be retained for 6 months from the date of your appointment.	in order to take steps	To the extent that a role will involve working with minors, processing is necessary for compliance with safeguarding law.	N/A		a condition in Parts 1- 2 of Schedule 1 to the Data Protection Act	Processing is necessary for the purpose of performing or exercising obligations or rights imposed or conferred by law in connection with employment, in circumstances where the College has an appropriate policy document in place. Processing is necessary for the protection of the public against dishonesty, unfitness or incompetence.	N/A	N/A

This may o	nent records: equality monitoring data. r consist of data concerning health, r, ethnicity or religious beliefs.	We obtain this data from you	For equality or monitoring purposes.	This information will only be held and processed in anonymised form. This information will be kept in perpetuity in an anonymised form for College records and monitoring purposes.	Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms		Substantial public interest under the UK Data Protection ActThe processing is of data concerning health, sexuality, ethnicity or religious beliefs and is necessary for equality of opportunity of treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality.	N/A	N/A	N/A
regarding	g our decisions (rejections, shortlists, v invitations, offers)	Oxford	To document the process under which applicants are considered for positions, and successful applicants are engaged as employees or office-holders at the College.	Recruitment records of successful applicants will be retained for 7 years from the date of the end of your contract of employment. Recruitment records for unsuccessful applicants will be destroyed three months from the date of completion of the recruitment process.		The College stores various records in compliance with immigration law requirements.	N/A	N/A	N/A	N/A
details, ne	negotiations, probation period and details (including salary).	Oxford We generate this data	To record the terms under which staff and office-holders are engaged by the College.	Appointment records will be retained for thirty years from the date of termination of your employment. This is in order to maintain complete and accurate records of your employment contract.	Processing is necessary for performance of our contract with you	· · · · · · · · · · · · · · · · · · ·	N/A	N/A	N/A	N/A
9 Appointm data		about you We obtain this data from you	For equality or monitoring purposes.	This information will only be held and processed in anonymised form. This information will be kept permanently in an anonymised form for College records and monitoring purposes.	for performance of our contract with you	our obligations under equality law, employment law and laws specific to the higher education sector.	Substantial public interest under the UK Data Protection Act 2018The processing is of data concerning health, sexuality, ethnicity or religious beliefs and is necessary for equality of opportunity of treatment purposes in accordance with the conditions and safeguards specified in the Data Protection Act 2018, with a view to promoting or maintaining such equality. In relation to College archives, the College has a legitimate interest in holding a record of its equality information over time.	N/A	N/A	N/A
	nent records: medical/health and	We obtain this data from you	To enable us to make appropriate adjustments during the recruitment process	One year from the time a decision is made on the application.	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	N/A	N/A	N/A
		We obtain this data from you		This information will be held for three months from the date of the end of your employment.	Processing is necessary for compliance with a legal obligation	Processing is necessary for compliance with equality law.	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	N/A	N/A	N/A
12 Photogra			To enable visual identification of staff and office-holders for security purposes. To publish images of staff and office-holders to enable identification by students, colleagues and third parties.	Permanently. This data will be held as part of the skeleton record of your employment for the purposes of College records and archives.	for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights	We have a legitimate interest in ensuring the security of our premises and the exclusion of non-authorised individuals. We, your colleagues, students and others also have a legitimate interest in being able to identify you. In relation to College archives, the College has a legitimate interest in holding a visual record of employees and office-holders over time.		N/A	N/A	N/A
and perso	es and expense claims.		and make necessary payments.	Data relating to expenses allowances and expense claims will be retained for 7 year from termination of your employment.	for performance of our contract with you.	ensuring appropriate use of the College expenses system. We have a legal obligation to manage expenses to the satisfaction of HMRC.		N/A	N/A	N/A
BACS ID, 1 details, pa	bayslips, bonus details, tax forms, tax ad payments information.	from you	Processing is necessary for the operation of the College payroll and benefits system.	PAYE and payroll data will be retained for 7 years from termination of your employment for the purposes of reporting to HMRC.	Processing is necessary for performance of our contract with you Processing is necessary for compliance with a legal obligation	We have a legal obligation to report salary and bank details to HMRC	N/A	N/A	N/A	N/A

				CCTV records, access control, and access logs are retained for six months. Security		Processing is necessary The College also processes special category	The processing is Where data is recorded concerning criminal	N/A
inci	ntrol records and access logs . Security cidents, accident reports and health and fety records.		safety and security arrangements.	incidents, accident reports, and health and safety records are retained for 5 years from creation. If such incidents are mentioned during governing body sessions, the minutes will be retained in the College archive in perpetuity.	contract with you.College property to authorised persons, maintaining a record of access and maintainingProcessing is necessarya record of incidents occurring on College	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws.	necessary inoffences/allegations relating to you.connection with legalproceedings (includingprospective legalproceedings),obtaining legal adviceor is otherwisenecessary forestablishing, exercisingor defending legalrights.The processing meetsa condition in Parts 1-3	Police or other law enforcement agencies in
Allo	ocation of key fobs/access cards.	We generate this data	To enable you to access College facilities while	This information will be retained for one year after termination of your	Processing is necessary	N/A	of Schedule 1 to the Data Protection Act 2018.	case of investigation of a potential crime or unlawful incident Third party health and safety management system N/A N/A
	, .	about you	maintaining the security of the College	employment.	for performance of our contract with you			
and rela	using applications, information, decisions d arrangements: tenancy applications, ated correspondence, tenancy agreements, nts, deposits and fee details.	We obtain this data from you We generate this data about you	housing used for employee and office-holder	Records relating to housing applications will be retained for 7 years from the date on which the tenancy ends [HMRC retention requirement].	Processing is necessary for performance of our contract with you Processing is necessary in order to take steps at your request prior to entering a contract Processing is necessary for compliance with a legal obligationWe are required by law to place deposits in certain deposit schemes, and hold appropriate records in relation to the same.	N/A	N/A	Mortgage providers, letting agencies
and resid nam	nusing applications, information, decisions d arrangements: details of College-owned sidential property occupants, including mes, ages, disability details, nationality and migration status data.	We obtain this data from you	housing used for employee and office-holder	These records will be retained for one year from the date on which the tenancy ends, or until superseded by a follow-up check [Home Office retention requirements].	Processing is necessary for performance of our contract with youWe are required by law to confirm and hold appropriate records regarding the immigration status of tenants. We also have a legitimate interest in knowing who the occupants of College properties are.at your request prior to entering a contractCollege properties are.Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms		N/A	N/A N/A
Pho	otographs (informal)	from the University of Oxford We generate this data	Photographic records of College life, including attendance at events and society memberships, are created on an ongoing basis. The College archives collect and store copies of such materials.		Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomsThe College has a legitimate interest in creating a historical archive recording College life.	N/A	N/A	N/A N/A
data and	nployment records: pension membership ta including identification numbers, quotes d projections, terms, opt-in and opt-out tices, benefits and contributions.	Third party		Most records relating to your pension will be retained for up to seven years following the end of your employment. After that time, only a skeleton record will be held, setting out the name of the provider, the date the employee joined the pension scheme and (where applicable) the date of retirement. It is expected that former staff will be able to obtain all relevant data on their pension from the relevant pension provider, in perpetuity.	Processing is necessary for performance of our contract with you Processing is necessaryWe, and you, have a legitimate interest in being able to request this data from the pensions provider at your request, and discussing it with you, including any implications of adjustments. We have a legal obligation to maintain records of pensionProcessing is necessary for compliance with a legal obligationobligation to maintain records of pension contributions.Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomseducation to request this data from the pensions provider at your request, and or someone else's legitimate interests, except where	N/A	N/A	AON pension administrator for College staff pension scheme
pen (a) c (b) ł inca (c) in rela sexu (d) a reve	her data relating to your occupational nsion scheme, including: death in service benefit nominations; health information about you (as a result of capacity retirement benefit); information about your spousal or other ationships which might identify your kuality; absence information, which might allow the verse engineering of trade union affiliation in e case of strike absences.		information to your occupational pension scheme provider.	Most records relating to your pension will be retained for up to 6 years following the end of your employment. After that time, only a skeleton record will be held, setting out the name of the provider, the date the employee joined the pension scheme and (where applicable) the date of retirement. It is expected that former staff will be able to obtain all relevant data on their pension from the relevant pension provider, in perpetuity.	Processing is necessary for performance of our contract with youWe, and you, have a legitimate interest in being able to provide this information to your occupational pension scheme provider, to enable the provider to operate the pension in accordance with the scheme and your and their respective rights and obligations.legitimate interests, except where overridden by your data protection rights and freedomsWe, and you, have a legitimate interest provide this information to your occupational pension scheme provider, to enable the provider to operate the pension in accordance with the scheme and your and their respective rights and obligations.	obligations or		AON pension administrator for College staff pension schemeN/AUniversities Superannuation SchemeImage: College staff pension of the pension providersOther pension providersImage: College staff pension pension providers

22 Details of your attendance at, and participation in, College administrat meetings, including Governing Body committees and working groups.			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	To the extent that the business of the relevant bodies forms an integral part of the provision of University education or publicly-funded research carried out in the public interest, the processing is necessary for the performance of the College's public task. As regards other aspects of such records, we have a legitimate interest in compiling a record of administrative and managerial matters, including details of those involved, decisions	N/A	N/A	N/A N	/A
23 Employment records: conflict of inte		or These records will be kept for six years from the termination of employment. If	and freedoms Processing is necessary	made and outcomes. The College also has a legitimate interest in the addition of such records to the College archives. We have a legitimate interest in understanding	N/A	N/A	N/A N	/A
declarations	from you family interests and/or loyalties conflict with those of the College.	declarations are mentioned during governing body sessions, the minutes will be retained in the College archive in perpetuity.	legal obligation Processing is necessary for the purposes of our or someone else's	when your interests may conflict with those of the College, and when you will be unable to contribute to College management and/or decisions. In certain circumstances we may also have a legal obligation to process this data. Conflict of Interest and Bribery Act.				
24 Next of kin/emergency contact data	We obtain this data To enable us to contact appropriate individual from you in the event that you are injured, become unwell, or there other relevant cause for concern regarding your well-being.	als This data will be destroyed within three months of the date of termination of your employment.	for the purposes of our or someone else's legitimate interests,	It is in you, and our, legitimate interests for us to have the means to contact a family member or other designated representative in a situation where there is significant concern for your welfare.		N/A	N/A N	/Α
25 Health and Safety Assessments	from you to your working environment and duties to	This data will be retained for 6 years from the date of termination of your employment, unless the assessment relates to the conduct and results of risk assessments of work which exposes employees to asbestos where records of assessments will be retained for 40 years.	Processing is necessary for compliance with a legal obligation		Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	N/A	Third-party health and N safety management system	/Α
26 Employment records: staff rotas, fle part-time working arrangements, tir casual work claim forms, and attend records		This data will be retained for 7 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you		N/A	N/A	N/A N	/Α
27 Probation period records, including duration, feedback and evaluations, materials relating to any decisions m	nd from the University of your contract with the College and College de. Oxford procedures. We generate this data about you	ith This data will be retained for 7 years from the date of termination of your employment.	Processing is necessary for performance of our contract with you		N/A	N/A	N/A N	/Α
28 Learning and development records, your attendance, completions, and certifications.	As part of an accurate and up to date record from you We generate this data about you Third party As part of an accurate and up to date record your employment by the College.	of This data will be held for 6 years from the date of termination of your employment	for performance of our contract with you. Processing is necessary for compliance with a legal obligation. Processing is necessary for the purposes of our or someone else's	comply with our legal obligations in relation to the mandatory provision of training on specific issues to employees and office holders. We , and you, also have a legitimate interest in our holding an up to date record of your learning and development achievements, for workforce planning and recognition.	N/A	N/A	N/A N	/Α
29 Employment records: promotion and progression materials including appl references and supporting materials of deliberations, decision notificatio feedback and awards; long service a	ations, recordsfrom the University of Oxford.promotion application and award process. relevant personal data may also be placed in the College archives as part of the record of		for performance of our	In relation to College archives, the College has a legitimate interest in holding records about employee and office-holder advancement.	N/A	N/A	N/A N	/Α

Grievances and related investigations raised with the College and relating to you, including records of any investigation and/or decision	from youappropriate records as part of the handling ofWe generate this datagrievances and related investigations.	Data will be retained for 7 years from the date of investigation, or the date of the decision resulting from the grievance process, whichever is later.	for performance of our contract with you.	parties who are involved, also have a	for carrying out obligations or	for carrying out obligations or		N/A	N/A
that we take, and of any subsequent appeal of resolution.	about you Third party					exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws			
			Processing is necessary for the purposes of our or someone else's legitimate interests, except where						
			overridden by your data protection rights and freedoms						
Teaching schedule information, including details of subjects taught, and size, timing and location of teaching sessions.		t This data will be retained for one year from the end of the relevant academic year.	for the performance of	The College and its students have a legitimate interest in processing data relating to teaching schedules and related information.		N/A		N/A	N/A
			Processing is necessary for the purposes of our or someone else's legitimate interests,						
			except where overridden by your data protection rights and freedoms						
Pastoral care records (College provision of pastoral care to students), including details of your pastoral responsibilities, advisees, interventions and advice.	We obtain this dataAs part of the records of students advisees, and to create a record for future consultationfrom youand to create a record for future consultationWe generate this data about youin the event of complaints. Lists of tutor groups are retained in the College archives.	This data will be retained permanently in the College archive.	for performance of our contract with you Processing is necessary for the purposes of our or someone else's	We have a legitimate interest in recording pastoral care information, in order to assess the proper functioning of the pastoral care system and to be able to handle complaints received in relation thereto. Advisees also have a legitimate interest in the creation of appropriate records of pastoral care received.	N/A	N/A		N/A	N/A
			overridden by your data protection rights and freedoms						
Business records: room bookings	We obtain this data from you We generate this data about you As part of the administration and management of College property.	t This data will be retained for one year from the end of the relevant academic year.	for the purposes of our or someone else's legitimate interests, except where	The College has a legitimate interest in the proper management of College facilities, in maintaining the security of College premises, in understanding the purposes for which facilities have been reserved, and in recording the identities of those booking College facilities.	N/A	N/A		N/A	N/A
Employment details: contact details (name, addresses, telephone numbers), as amended from time to time.	from the University of Oxfordas an employee or office holder at the College, and (where applicable) to comply withWe obtain this dataimmigration law. These details will also appear		Processing is necessary for performance of our contract with you.		N/A	N/A		N/A	N/A
	from you on documents and materials held in the We generate this data College archive. about you		Processing is necessary for compliance with a legal obligation. Processing is necessary						
			for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedoms						
disciplinary, harassment or similar complaint is		This data will be kept for 6 years from the outcome of the investigation or related disciplinary decision. Where appropriate, a reference to the fact disciplinary proceedings took place and the relevant date will be retained on your skeleton	Processing is necessary for performance of our contract with you.		Processing is necessary for carrying out obligations or	a condition in Parts 1-3	Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social	N/A	N/A
including records of any investigation and / or decision that we take, dismissal records, settlements, and of any appeals process.	We obtain this data from you We generate this data about you Third party	employment record permanently.	Processing is necessary for compliance with a legal obligation		exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	Data Protection Act 2018	security/protection as authorised by UK laws		
Appraisal information, including objectives, feedback given to and received about you, records of appraisal discussions and Personal Development Plans	We obtain this data To monitor, assist in and record your from you professional development. Third party	These records will be kept for three years from the date that they are superseded by an updated appraisal, or three years following the termination of your employment (whichever is longer).	Processing is necessary for performance of our contract with you		Processing is necessary for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	N/A		N/A	N/A

38 Sabbatica	cal entitlements, including	We obtain this data For the management of your sabbatical	This data will be kept for 7 years from end of the tax year in which sabbatical	Processing is necessary To the extent that our purposes support the	N/A		N/A	N/A	N/A
	ed dates, historical sabbatical periods,		discussions take place. If discussions relating to sabbatical entitlements are	for performance of our provision of teaching within the College,					
		We generate this data your role during your absence, and as part o		contract with you. processing is necessary for the performance of	f				
on sabbat	paticals taken.	about you your record of employment with the College		a public task. For other purposes, we have a					
		To the extent that sabbatical data is discusse in College committee, personal data may als		Processing is necessary legitimate interest in monitoring and managin for the performance of the availability of employees and office-	g				
		be recorded in the College archive in the		a task carried out in holders.					
		meeting minutes.		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					
39 Reference	nces provided by, or in relation to, you	We obtain this data References in relation to you are provided for	or Records of references will be kept for one year from the date of provision of the	Processing is necessary We, and you have a legitimate interest in	N/A		N/A	Potential employers or	Depending on where you
			to reference. An entry noting that a reference was provided will be retained on your	for the purposes of our providing you with references and keeping a	,			education providers	have applied, these
		We generate this data seek alternative employment or take up	skeleton employment record permanently.	or someone else's record of what was said. We also have a					recipients may be outside o
		about you voluntary posts, allowing you to access certa	in	legitimate interests, legitimate interest in keeping a record of					the UK.
		libraries and archives, and for provision to prospective landlords. References provided	by	except whererecommendations or comments made byoverridden by youremployees and office-holders in their official					
		you are held in order that the College has a	by	data protection rights capacity.					
		record of recommendations or comments		and freedoms					
		made by employees and office-holders in the	eir						
		official capacity.							
40 5	nd mod headdara tool at the too to the								NI/A
	nd meal bookings, including details of stored on College navment systems	We obtain this dataFor the management of College cateringfrom youprovision	Records of outstanding payments will be retained until they are paid in full. Record relating to event and meal bookings will be retained for one year after the end of	s Processing is necessary We have a legitimate interest in the sound and for the purposes of our efficient management of College catering and			N/A	N/A	N/A
		We generate this data	the academic year in which the event took place.	or someone else's events, including recording the identity of					
		about you		legitimate interests, attendees, and recording and arranging for the	e				
				except where recovery of monies owed.					
				overridden by your					
				data protection rights					
				and freedoms					
41 Medical o	l questionnaires, notes and	We obtain this data For Occupational Health purposes and in	Records relating to occupational health will be retained for 6 years from the	Processing is necessary	Processing is necessary		N/A	N/A	 N/A
	tional health reports, including specifics		lity termination of employment . Medical records relating to the Control of Asbestos at		for carrying out				
of health	h issues, records of consequent	We generate this data legislation.	Work Regulations or Control of Substances Hazardous to Health Regulations will be		obligations or				
		about you	retained for 40 years.	Processing is necessary	exercising our or your				
thereto.		Third party		for compliance with a	rights or obligations in				
				legal obligation	employment or social security/protection as				
					authorised by UK laws				
1 I									
		We obtain this data To record, monitor, plan for and respond to	Records relating to vacation/maternity/paternity/shared parental leave, time off for				Processing is necessary To the extent that absences are due to	N/A	N/A
(including	ng but not limited to vacation,	from you absences.	dependants, and career breaks will be retained for 7 years from the date of the	for performance of our with employment and eqaultiy law and our	for carrying out	health or reasons linked to 'special category'	for carrying out allegations of criminal behaviour or criminal	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data		for performance of ourwith employment and eqaultiy law and ourcontract with youobligations to HMRC. We, you and other	for carrying out obligations or		for carrying outallegations of criminal behaviour or criminalobligations orconvictions.	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences.	dependants, and career breaks will be retained for 7 years from the date of the	for performance of ourwith employment and eqaultiy law and ourcontract with youobligations to HMRC. We, you and otherProecssing is necessarypeople have a legitimate interest in health	for carrying out obligations or exercising our or your	health or reasons linked to 'special category'	for carrying outallegations of criminal behaviour or criminalobligations orconvictions.exercising our or your	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data	dependants, and career breaks will be retained for 7 years from the date of the	for performance of ourwith employment and eqaultiy law and ourcontract with youobligations to HMRC. We, you and other	for carrying out obligations or	health or reasons linked to 'special category'	for carrying outallegations of criminal behaviour or criminalobligations orconvictions.	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data	dependants, and career breaks will be retained for 7 years from the date of the	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and otherProecssing is necessary for compliance with a legal obligationpeople have a legitimate interest in health issues for workplace planning.Procesing is necessaryProcesing is necessary	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data	dependants, and career breaks will be retained for 7 years from the date of the	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and otherProecssing is necessary for compliance with a legal obligationpeople have a legitimate interest in health issues for workplace planning.Procesing is necessary for the purposes of ourpeople have a legitimate interest in health	for carrying out obligations or exercising our or your rights or obligations in employment or social	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or socialallegations of criminal behaviour or criminal convictions.	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data	dependants, and career breaks will be retained for 7 years from the date of the	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and otherProecssing is necessary for compliance with a legal obligationpeople have a legitimate interest in health issues for workplace planning.Procesing is necessary for the purposes of our or someone else'sist employment and eqaultiy law and our obligations to HMRC. We, you and other	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	N/A	N/A
(including maternity	ng but not limited to vacation, ity/paternity/shared parental leave,	from you absences. We generate this data	dependants, and career breaks will be retained for 7 years from the date of the	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and otherProecssing is necessary for compliance with a legal obligationpeople have a legitimate interest in health issues for workplace planning.Procesing is necessary for the purposes of ourpeople have a legitimate interest in health	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as	N/A	N/A
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43 Opinions a student's expressed meetings 44 Computer login, use College IT connect t	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on it's academic and other reports, and red during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of our contract with you.Processing is necessary for the performance of a task carried out in the public interest.To the extent that the materials in question relate to the education provided at the College, the processing is necessary legitimate interest in maintaining records of College matters, including reports and discussions thereon. In some circumstances processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomsWe have a legitimate interest in the proper management of College IT resources.	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
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43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with you Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interestswith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a task carried out in the public interest.Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests,To the extent that the materials in question relate to the education provided at the College, the processing is necessary for the 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you ted or logged in to our network, records	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with you Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interestswith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a task carried out in the public interest.Processing is necessary for compliance with a legal obligation Processing is necessary for compliance with a legal obligation Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you ted or logged in to our network, records	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with you Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interestswith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a task carried out in the public interest.Processing is necessary for compliance with a legal obligation Processing is necessary for the purposes of our or someone else's legitimate interests,To the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a public task. We also have a legitimate interest in maintaining records of discussions thereon. In some circumstances 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you ted or logged in to our network, records	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interestswith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a public task. We also have a Processing is necessary for the performance of a public task. We also have a legitimate interest in maintaining records of discussions thereon. In some circumstances processing is necessary for the purposes of our our employment, equality or other legal Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomsWe have a legitimate interest in the proper management of College IT resources.Processing is necessary 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you ted or logged in to our network, records	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with youwith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Igal obligation Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of our contract with you.Processing is necessary for the performance of our contract with you.To the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a public task. We also have a performance of a public task. We also have a legitimate interest in maintaining records of college matters, including reports and discussions thereon. In some circumstances processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomsWe have a legitimate interest in the proper management of College IT resources.Processing is necessary 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A
43 Opinions a student's expressed meetings 44 Computer login, use College IT connect ta allocated connected connecte	ng but not limited to vacation, ity/paternity/shared parental leave, f for dependants, career breaks, etc.) as and comments made by you on 's academic and other reports, and ed during or in relation to College gs (to the extent recorded). ter and email information, including sername and password information for IT systems, IP addresses of devices you t to College IT systems, equipment ed to you, and details of when you ted or logged in to our network, records	from you We generate this data about youabsences.We obtain this data from you We generate this data about youAs part of College records and minutes concerning teaching, management and administration. Copies are provided to the College Archives.We obtain this data from youCollege Archives.We obtain this data about youFor the proper management of College IT resources.We obtain this data from the University of Oxford We generate this data about youFor the proper management of College IT resources.	dependants, and career breaks will be retained for 7 years from the date of the absence. In perpetuity as part of College archives.	for performance of our contract with you Processing is necessary for the purposes of our or someone else's legitimate interestswith employment and eqaultiy law and our obligations to HMRC. We, you and other people have a legitimate interest in health issues for workplace planning.Processing is necessary for the purposes of our or someone else's legitimate interestsTo the extent that the materials in question relate to the education provided at the College, the processing is necessary for the performance of a public task. We also have a Processing is necessary for the performance of a public task. We also have a legitimate interest in maintaining records of discussions thereon. In some circumstances processing is necessary for the purposes of our our employment, equality or other legal Processing is necessary for the purposes of our or someone else's legitimate interests, except where overridden by your data protection rights and freedomsWe have a legitimate interest in the proper management of College IT resources.Processing is necessary 	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws	health or reasons linked to 'special category'	for carrying out obligations or exercising our or your rights or obligations in employment or social security/protection as authorised by UK laws allegations of criminal behaviour or criminal convictions. N/A N/A		N/A

	Leave and buy-out requests, including records			Records will be retained for 6 years from the date of the decision.	Processing is necessary	N/A	N/A		N/A	N/A
(of request consideration and decisions.	from the University of Oxford	subsequent to successful grant applications.		for performance of our					
		Oxford We obtain this data			contract with you					
		from you								
	Employment records: sickness records and	We obtain this data		Sickness records including Medical and Self Certificates will ordinarily be held for 7		Processing is necessary To the extent that absences are due to ill	N/A		Occupational Health	N/A
	related documentation, including sickness	-	in the management of employees suffering ill	years.	for performance of our employment law, equality law, and Health and				providers	
	absence forms, employee 'Fit' notes, return to Work documentation.	_	health, to monitor reasons for absences, to consider relevant Health and Safety issues	Where records are known to be those of employees exposed to a substance	contract with you. Safety obligations.	obligations or information as defined under GDPR. exercising our or your				
	work documentation.	'		hazardous to health (i.e. those who have been diagnosed with an asbestos-related	Processing is necessary	rights or obligations in				
			time.	illness, or where the College is aware that the employee has been exposed to an	for compliance with a	employment or social				
				actionable levels of asbestos as set out in the Control of Asbestos at Work	legal obligation	security/protection as				
				Regulations 2002; those who have been exposed to lead in accordance with the		authorised by UK laws				
				Lead (Control of Lead at Work Regulations		Processing is necessary				
				1980) or those exposed to radiations in accordance with the (Ionising Radiation		for the assessment of				
				Regulations 1985)), those records will will be retained for 40 years from the		the working capacity				
				termination of employment.		of the employee, medical diagnosis, the				
						provision of health and				
						social care or				
						treatment				
	Research project and funding applications and		As part of your record as an employee or office	Permanently	Processing is necessary We have a legitimate interest in recording the		N/A		Bodies tasked with	N/A
ľ	renewals.	from the University of	holder at the College.		for performance of our research activities of our employees and office				assessment and/or grading	
		Oxford			contract with you. holders, and identifying sources of funding				of teaching and research	
		We obtain this data			they receive and supporting applications for Processing is necessary funding made				outputs, including but not	
		from you			Processing is necessary funding made. for the purposes of our				limited to those involved in the Teaching Excellence	
					or someone else's				Framework and the	
					legitimate interests,				Research Excellence	
					except where				Framework	
					overridden by your					
					data protection rights					
					and freedoms					
	Capability procedure records, including			This data will be retained for 6 years from the end of the capability procedure.	Processing is necessary We have a legitimate interest in managing the		N/A		N/A	N/A
		-	and to appropriately manage under-		for performance of our under-performance of employees	for carrying out				
	performance indicators, records of review		performance.		contract with you. appropriately.	obligations or				
	meetings and feedback, decisions and	We obtain this data			Processing is percessing	exercising our or your				
ľ	outcomes.	from you We generate this data			Processing is necessary for the purposes of our	rights or obligations in employment or social				
		about you			or someone else's	security/protection as				
		Third party			legitimate interests,	authorised by UK laws				
					except where					
					overridden by your					
					data protection rights					
					and freedoms					
	End of employment records, including details			These records will be retained for seven years from the date of termination of your		a Explicit consent		Where allegations of, or convictions for,	N/A	N/A
	•	'	office holders leave, to identify trends and issues, and to enable us to make	employment.	for the purposes of our legitimate interest in understanding the or someone else's reasons that employees and office holders			criminal offences are held as part of leaver records, this data will usually be either public		
	and redundancy records (redundancy details, calculations of payments, refunds, notification	-	improvements going forward. Where		or someone else's reasons that employees and office holders legitimate interests, leave. We also have a legitimate interest in			information, held for the purpose of obtaining		
	to the Secretary of State) or termination		employees have left due to redundancy or		except where holding appropriate records relating to			legal advice in connection with legal		
	records.		their contracts have been terminated, we keep		overridden by your potentially contentious decisions.			proceedings, be necessary for the exercise of a		
			records to ensure we can respond		data protection rights			function conferred on the College by an		
			appropriately to any ongoing queries.		and freedoms			enactment or the rule of law, or held in the		
								public interest for the purpose of protecting		
							-	the public against unfitness, improper conduct		
							connection with legal	or similar.		
							proceedings (including prospective legal	Where no such grounds for processing this		
								data apply, it will be held and processing only		
		1	1					based on your consent.		
									1	
							necessary for the			
							purpose of obtaining			
							· ·			
							purpose of obtaining			
							purpose of obtaining			
			As part of the proper functioning of the	These records will be retained for 7 years from the date of termination of your	Processing is necessary for performance of our	N/A	purpose of obtaining		N/A	N/A
	membership details, including (where relevant)) from you	employee and office holder benefits system.	These records will be retained for 7 years from the date of termination of your employment.	for performance of our	N/A	purpose of obtaining legal advice.		N/A	N/A
1	membership details, including (where relevant) but not limited to subscriptions for childcare) from you We generate this data	employee and office holder benefits system.			N/A	purpose of obtaining legal advice.		N/A	N/A
	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare) from you We generate this data about you	employee and office holder benefits system.		for performance of our	N/A	purpose of obtaining legal advice.		N/A	N/A
	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare) from you We generate this data about you	employee and office holder benefits system.		for performance of our	N/A	purpose of obtaining legal advice.		N/A	N/A
	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare providers used, healthcare interest free loans and travel passes.) from you We generate this data about you Third party	employee and office holder benefits system.	employment.	for performance of our contract with you	N/A	purpose of obtaining legal advice.			N/A
	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare providers used, healthcare interest free loans and travel passes. Library access and book records, overdue book) from you We generate this data about you Third party	employee and office holder benefits system.	employment. These records will be retained for a period of one year from the date of closure of	for performance of our contract with you Processing is necessary	N/A N/A	purpose of obtaining legal advice.		N/A N/A	N/A N/A
	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare providers used, healthcare interest free loans and travel passes.) from you We generate this data about you Third party	employee and office holder benefits system.	employment.	for performance of our contract with you	N/A	purpose of obtaining legal advice.			N/A N/A
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	membership details, including (where relevant) but not limited to subscriptions for childcare vouchers and details of relevant childcare providers used, healthcare interest free loans and travel passes. Library access and book records, overdue book records, records of library cards and library) from you We generate this data about you Third party	employee and office holder benefits system.	employment. These records will be retained for a period of one year from the date of closure of	for performance of our contract with you Processing is necessary for performance of our contract with you. Processing is necessary	N/A N/A N/A	purpose of obtaining legal advice.			N/A N/A
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Records of information security incidents and of PC misuse incidents		updated and secure, and in case records are required for subsequent disciplinary or police	This data will be retained for a period of one year from the last date of action in relation to the incident.		The College has a legitimate interest in the effective management, and proper use, of its IT systems.	N/A		The processing is necessary for the purpose of obtaining legal advice or is otherwise necessary for establishing, exercising or defending legal rights. The processing meets a condition in Parts1-3 of Schedule 1 to the Data Protection Act 2018	Most commonly such data would be processed in connection with the detection or prevention of an unlawful act.		N/A
Email contact information used in ad hoc mailing lists, for example for College events.	We obtain this data from you We generate this data about you		Your email contact data will be removed from mailing lists within three months of the termination of your employment.		The College, its employees and office holders have a legitimate interest that employees and office holders are notified of College events.	N/A		N/A		N/A	N/A
Records generated for legal or statutory compliance purposes that contain names and/or associated personal data. For example, copies of data supplied pursuant to requests made under data protection and/or freedom of information legislation, records made to comply with safeguarding, health and safety or counter-terrorism legislation, in connection with legal advice or claims, or to comply with auditors' requirements.	about you	So that we have a record of information supplied, both in the interests of good administration and also to meet legal and regulatory requirements.	This data will be retained for a period of 7 years from the termination of your employment, unless there is compelling justification for the data to be retained fo a longer period eg in connection with legal advice, or in relation to auditing obligations.	Processing is necessary r for compliance with a legal obligation		Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	a condition in Part 2 of Schedule 1 to the Data Protection Act 2018	Where it processes special category data for these purposes, the College is exercising functions conferred under legislation. The processing is necessary for reasons of substantial public interest, namely the requirement for the College to comply with its statutory and legal obligations.	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; College auditors	N/A
Joint equity scheme arrangements, including title documents, copies of mortgage paperwork and payment records		equity scheme arrangement.	These records will be retained for 7 years following release of the College's charge over the property.	Processing is necessary for performance of our contract with you. Processing is necessary in order to take steps at your request prior to entering a contract		Data Protection Act	To the extent that is it necessary to process special category data, this will be done for reasons of substantial public interest under the UK Data Protection Act 2018.		To the extent that criminal conviction data is relevant and processed by use in relation to the joint equity scheme, we would process it for the purpose of obtaining legal advice.	Mortgage providers, letting agencies	g N/A
SCR membership files: names, contact details, commencement of membership, terms.	from you	Certain individuals are members of the College SCR post-employment or in circumstances where they have never been employed by the College. Files relating to such members, which provide a record of arrangements in place between us, are kept by the College.			The proper maintenance of SCR records is in you, and our, legitimate interests.	Explicit consent		N/A		N/A	N/A