

Brasenose Colleges GDPR ROPA - Student Applicant & Outreach Processing Activities - v1.2 (May 2018)

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 grounds	Special category- details of public interest etc (where appropriate)	Criminal conviction/ criminal allegation grounds	Criminal conviction/criminal allegation grounds (further information)
1	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: EITHER for 25 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.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years after the last date when you could have enrolled.	You have given your consent to the processing for one or more specific purposes.					
2	Records of open days and study days: these can include attendees names and contact details, email addresses, dietary requirements, accommodation bookings we make (and if you book accommodation, your phone number and emergency contact numbers).	We obtain this data from you We generate this data about you		Two years after the open day or study day	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 and prospective students have a legitimate interest in arranging and attending open days to share and learn about College life before deciding whether to apply.				
3	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 during the application process.  [Colleges will need to insert other data sources appropriate to their circumstances e.g. where data relating to candidates for ministerial training is supplied by the Church of England, listing what that data consists of and considering whether it contains special category information e.g. on the candidates' religion/belief]	We obtain this data from the University of Oxford	To make admission decisions.	Successful applicants who enrol: EITHER for 25 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.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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.  [In the example of Church of England ministerial training the ground is arguably that the candidate's religion and belief is "manifestly made public" in their application (GDPR 9(2)(c)) although detailed analysis is beyond the scope of our instruction. The other alternative would be to obtain explicit consent from the applicant but query could withdrawal of consent cause problems for the course delivery.]				
4	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: EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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.				

5	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: EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years after the last date when you could have enrolled.	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.
6	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 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.	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: EITHER for 25 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.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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.				
7	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.	Successful applicants who enrol: EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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 receiving and responding to a range of queries from prospective students.				
8	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/undergraduate/applying-to-oxford/decisions/contextual-data?wsl=1">https://www.ox.ac.uk/admissions/undergraduate/applying-to-oxford/decisions/contextual-data?wsl=1</a>	Successful applicants who enrol: EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years after the last date when you could have enrolled.	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.				
9	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: EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years 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	EITHER for 25 years after the end of the academic year when you cease to be a registered student.  OR IF ALL RETAINED IN ARCHIVE: Permanently.  Unsuccessful applicants: for 6 years after the end of the application cycle.  Successful applicants who do not enrol: 6 years after the last date when you could have enrolled.	Explicit consent			