

Children and Young Person Privacy Notice: How we use your personal information at CUSU

This page provides information about the use of your personal information by CUSU, whether this is as part of a single survey, an ongoing campaign, or participation in CUSU activities more widely.

Cambridge University Students' Union ("we", "our" or "us") promises to respect any personal data you share with us, or that we get from other organisations and keep it safe. We aim to be clear when we collect your data and not do anything you wouldn't reasonably expect.

1. What is 'personal information'?

'Personal information' means any information which relates to or identifies you as an individual.

2. How does this webpage relate to other information about data protection?

CUSU engages with you in a number of ways in the course of its legitimate activities as a students' union. In the course of your interaction with CUSU your data may be retained, and where this occurs, CUSU will be able to demonstrate a legal basis for doing so and will, wherever required, inform you of its collection. This page outlines how CUSU processes data and aims to notify you of how your data is processed.

Whilst the majority of children and young person's information you provide to us is mandatory, some of it is provided to us on a voluntary basis. In order to comply with the data protection legislation, we will inform you whether you are required to provide certain information to us or if you have a choice in this.

In addition to the information published here, when you use specific activities and facilities offered by CUSU, you will be told about any other uses of your personal information for that specific purpose, where consent is required.

3. Who will process my personal information?

The information published here applies to the use, sharing and disclosure of your personal information by Cambridge University Students' Union ('CUSU'). CUSU is a separate legal entity from both the University of Cambridge (<http://www.cam.ac.uk/>), and each of the 31 Cambridge Colleges for these purposes. The University and your College will provide you with its own statement setting out how it will use, share and disclose your personal information while you are a student.

Only CUSU employees, or contracted agents working under the direction of our employees, will process your information; and those employees with responsibility for processing will undertake their duties in accordance with CUSU's Safeguarding Policy. As part of this, personnel engaged with work supporting children and young people will have been checked under the Disclosure and Barring Service.

4. What personal information will be processed?

CUSU will keep a record of the information you submit in the course of participation in any of its activities and/or with its personnel: such as any given survey, campaign-orientated or consultative exercise, involvement in any schemes or outreach programs, correspondence, or use of CUSU services and facilities. CUSU will keep a record of the details you provide in

these instances, as well as any supplementary personal information from the University or your school.

The categories of this information that we collect, process, hold and share include: personal information (such as name, unique pupil number and address) and personal characteristics (such as ethnicity, language and free school meal eligibility). This personal information may include data such as your name, home address, date of birth, equality and diversity data, courses studied, expected grades and any relevant medical information.

Your personal information is created, stored and transmitted securely in a variety of paper and electronic formats. Access to your personal information is limited to CUSU employees who have a legitimate interest in this data collected for the purpose of carrying out their contractual duties relating to the legitimate charity activities of the students' union. Our use of your personal information will not be excessive or unwarranted. We do not give out any of your details to third-parties for the purpose of marketing or solicitation.

In addition to this, CUSU may process some information about you that is classed as 'sensitive' or 'special category' personal data, and which requires additional protections. This includes information concerning your ethnicity, sexual orientation, religious beliefs or health/disability that we use for planning and monitoring purposes, or in order to provide care, help or suitable adjustments, as well as to assess the equalities-culture of the student body and the University and those children and young people participating in our programmes. Access to, and the sharing of, your 'sensitive' personal data is controlled very carefully.

The categories of child and young person's information that we *may* process include:

- a) personal identifiers and contacts (such as name, unique pupil number, contact details and address);
- b) characteristics (such as ethnicity, language, and free school meal eligibility);
- c) safeguarding information (such as court orders and professional involvement);
- d) recognised Widening Participation identifiers (such as postcode area and social rankings related to educational attainment, career success/social mobility indicators and economic indicators of wealth, privilege or earnings of parents);
- e) assessment and attainment (such as key stage 4 and above, post 16 courses enrolled for; and any relevant results);
- f) attendance (such as sessions attended, number of absences, absence reasons and any previous schools attended);
- g) special educational needs (including the needs and ranking); and
- h) behavioural information (such as exclusions and any relevant alternative provision placements put in place).

Ordinarily we would only expect to process categories a) to e), however from time-to-time in the conduct of organising safe, compliant activities for children and young people, the additional categories may need to be processed.

5. What is the purpose and legal basis of the processing?

We use children and young person's data to:

- a) enable us to carry out specific functions for which we are responsible and you have approached us regarding;
- b) derive statistics which inform decisions that relate to the programmes you participate in and our own charitable objects; and to
- c) assess performance and to review our progress against our aims.

CUSU will process your personal information for a range of contractual and internal purposes, including the following:

- to represent student interests at the University of Cambridge in accordance with the Union's constitution and democratic functioning;
- to provide, run and coordinate activities and facilities to you (e.g. Access and Widening Participation initiatives, etc.);
- to enable your participation in organised activities and events (e.g. student schemes such as the Shadowing Scheme; attendance at training, forum or social events organised for you to attend; etc.);
- to communicate effectively with you (predominantly via email and online/via digital means), including the distribution of relevant [e-]newsletters, memos and circulars, and notice of plans, applications and arrangements;
- to gauge member satisfaction and gather feedback, operate security (including CCTV), deal with complaints and issues, and for monitoring purposes;
- to support your training, medical, safety, welfare and religious requirements; and
- to compile statistics and conduct research for internal reporting purposes.

When we seek to obtain information for a specific project or survey, which aims to solicit your opinion, we will seek your consent at the point of collection (which you can withdraw at any time); this will detail the purposes that this data will be used for. However, this data may also be used for equalities monitoring and performance review, and as this processing is in the course of the official duties of CUSU, the law does not require your consent for us to use your data in this way. However, your data will not be processed in such a way as to make you as an individual identifiable to any external or unauthorised parties, except where your explicit consent is given.

We consider the processing of your personal information for these purposes to be either necessary for the performance of our contractual obligations with you (e.g. to manage your experience on an outreach programme coordinated by the Union), or necessary for compliance with a legal obligation (e.g. equal opportunities monitoring), or necessary for the performance of tasks we carry out in the public interest (e.g. Widening Participation activities), or necessary for the pursuit of the legitimate interests of CUSU or an external organisation (e.g. to enable your access to external services).

We will obtain your given explicit consent in order to process your application for any Access and Widening Participation initiative. We will also seek the consent of your legal guardian where appropriate. We also consider the processing of your personal sensitive information for these purposes to be either necessary to protect the vital interests, such as by ensuring a fair and transparent applications process is coordinated for our Access activities.

We will not use your personal information to carry out any wholly automated decision-making that affects you¹.

We will ensure that:

- data is kept safe and secure;
- data is handled legally, responsibly, and ethically;
- we are open and transparent about what data we are using and why; and

¹ Automated decision making is the ability to make decisions without human involvement. In practice, profiling can often be a precursor to automated decision making. 'Profiling' is a form of 'automated processing' of personal data used to analyse or predict matters relating to an individual.

- all legal requirements are met regarding data privacy.

6. Who will my personal information be shared with?

In the course of its legitimate activities as a students' union, CUSU may share your information with service-providers contracted to support its operations. For example, CUSU may engage the services of an email client to process its email; may utilise online storage services; or may engage in services that help to securely manage sensitive datasets such as mailing lists or survey data. In the course of engaging with any third party services your data will only ever be shared for legitimate administrative purposes and for CUSU's own legitimate activities; your data will never be sold to third parties and strict contractual provisions will be in place, along with internal management controls, to ensure contracted services facilitate CUSU's legitimate use of your data only.

In the course of delivering outreach activities or ongoing Access initiatives, such as e-mentoring, the Shadowing Scheme or Target Schools, we may share your information to contracted third parties where necessary for the fulfilment of the activity. We will also share your information with your parent or guardian, representatives of your school (e.g. teacher) and student volunteers allocated to provide activity for you at the University (such as a mentor and an elected volunteer coordinating volunteer activities). This will be obvious when you provide your information to us. In order to host children and young people at the University of Cambridge in our organised activities we will share your information, only as necessary to ensure your safety, to organise a successful visit, and to inform monitoring activities, with representatives of the University and its Colleges.

In the course of informing university-wide campaigns CUSU may share your information with either the University or individual Colleges, especially concerning matters of your welfare² or for monitoring purposes (such as reviewing the impact of an Access Scheme on your decision-making to Higher Education). When matters concerning the well-being of a specific student arise, you may be identified to a College or the University, but only when this is necessary for the health or safety of an individual (such as for law-abiding purposes).

As described above, your personal information is shared with relevant staff at the Cambridge Colleges as required and with the University. In addition, it is shared as permitted or required by law, on a considered and confidential basis, with a range of external organisations, which may include the following where necessary for legitimate processing:

- external individuals involved in relevant CUSU committees or procedures;
- relevant Higher Education bodies (e.g. Office for Students, Office of the Independent Adjudicator, National Union of Students, the organisation(s) running the National Student Survey and other student and leaver surveys);
- on occasion and where necessary, the police and other law enforcement agencies;
- on occasion and where necessary, independent auditors or Government taxation agencies;
- on occasion and where necessary, subsidiary companies of the University;
- companies or organisations providing specific services to, or on behalf of CUSU, the University and/or one or more Colleges; or
- the providers of any external/collaborative learning and training placements or opportunities.

We hold information about young people living in the UK, including about their education and training history. This is to support the Union's programmes that aim to increase

² CUSU is only able to share the data it collects (e.g. via correspondence, or its daily activities), and only obligations to the law or safety of individuals shall necessitate a conflict to confidentiality expressed during collection.

participation from less traditional backgrounds at the University of Cambridge. Under parts 1 and 2 of the Education and Skills Act 2008, education institutions and other public bodies (including the Department for Education (DfE), police, probation and health services) may pass information to us to help us to support these provisions.

On occasion, the above types of sharing may involve the transfer of your personal information outside the European Economic Area (e.g. to facilitate your participation in an activity, or to utilise a secure administrative service for CUSU's day-to-day activities). Such transfers usually are necessary in order to meet our legal or contractual business obligations, and are carried out with appropriate safeguards in place to ensure the confidentiality and security of your personal information.

Other than as set out above, we will not normally publish or disclose any personal information about you to other external enquirers or organisations unless you have requested it or consented to it, or unless it is in your vital interests to do so (e.g. in an emergency situation).

7. How long is my information kept?

Any information that you submit to CUSU, or that was otherwise collected, is kept for a period of seven years, or longer dependent upon the use of your data as outlined at the point of collection – such as the use of multi-year statistics in order to inform campaigns and initiatives. Anonymised forms of your data may be kept beyond this.

8. How can I access my personal information?

Under data protection legislation, parents and pupils have the right to request access to information about them that we hold. To make a request for your personal information, or be given access to data held on your child, contact info@cusu.cam.ac.uk.

You also have the right to:

- a) object to processing of personal data that is likely to cause, or is causing, damage or distress
- b) prevent processing for the purpose of direct marketing
- c) object to decisions being taken by automated means
- d) in certain circumstances, have inaccurate personal data rectified, blocked, erased or destroyed; and
- e) claim compensation for damages caused by a breach of the Data Protection regulations

If you have a concern about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you would like further information about this privacy notice, please contact: info@cusu.cam.ac.uk