

College Policies and Procedures

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Freedom of Speech

Statement on Freedom of Speech

Adopted by Governing Body: November 2024

Review Date: Michaelmas Term 2027

This statement sets out Murray Edwards College's commitment to freedom of thought and expression, outlines the various legislative frameworks under which such freedoms must be upheld and may be circumscribed, and summarises the procedures used by the College to manage these issues.

Murray Edwards College is fully committed to the principle, and to the promotion, of freedom of speech and expression. The College's core values are 'freedom of thought and expression' and 'freedom from discrimination, and thus it fosters an environment in which all of its Fellows, staff and students can participate fully in College life, and feel able to question and test received wisdom, and to express new ideas and controversial or unpopular opinions within the law, without fear of intolerance or discrimination. In exercising their right to freedom of expression, the College expects its Fellows, staff, students and visitors to be tolerant of the differing opinions of others, in line with the College's core value of freedom of expression. The College also expects its Fellows, staff, students and visitors to be tolerant of the diverse identities of others, in line with the College's core value of freedom from discrimination. While debate and discussion may be robust and challenging, all speakers have a right to be heard when exercising their right to free speech within the law.

The College will ensure that Fellows and staff are able to exercise freedom of thought and expression within the law without placing themselves at risk of losing their job or any College privileges and benefits they have. The College expects all Fellows, staff and students to engage with intellectual and ideological challenges in a constructive, questioning and peaceable way, even if they find the viewpoints expressed to be disagreeable, unwelcome or distasteful. The right of Fellows, staff and students to freedom of assembly, and to protest against certain viewpoints, should not obstruct the ability of others to exercise their lawful freedom of expression.

These commitments are reinforced by the Human Rights Act 1998, which brings the European Convention on Human Rights into direct effect in national law. Article 10 of the Convention articulates freedom of expression as a human right and sets out the limited circumstances in which that right might be circumscribed (such as to protect public safety, for the prevention of disorder or crime, or for the protection of the reputation or

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rights of others). These commitments also exist within other UK legislation. Universities in England and Wales, notably, have a statutory duty under section 43 of the Education (No. 2) Act 1986 to take such steps as are reasonably practicable to ensure that lawful freedom of speech and expression is secured for all Fellows, staff and students and for visiting speakers. As part of this statutory duty the College is also required to issue and keep up to date a code of practice to be followed by all members, students, and employees of the College for the organisation of meetings and other events whether indoors or outdoors on College premises. The Code also sets out the conduct required of all individuals involved in such meetings and events.

In addition, section 26 of the Counter-Terrorism and Security Act 2015 places a duty on certain bodies, including Higher Education Institutions, in the exercise of their functions to have 'due regard to the need to prevent people from being drawn into terrorism'. This necessitates the establishment of protocols and procedures by which to assess the risks associated with meetings or events that are College hosted, affiliated, funded, or branded. This Act also requires Higher Education Institutions to have particular regard to other statutory duties with regard to academic freedom and freedom of expression. Debate, discussion, and critical enquiry are, in themselves, powerful tools in preventing people from being drawn into terrorism.

An active speaker programme is fundamental to the academic and other activities of the College and Fellows, staff and students are encouraged to invite a wide range of speakers and to engage critically but courteously with them. This Statement and the Code provide the only mechanism by which the College can cancel or impose conditions on meetings or events where this action is deemed necessary as a result of the event's subject matter and/or speaker(s). This is to ensure that the use of College premises is not inappropriately denied to any individual or body of persons on any ground connected with their beliefs or views or the policy or objectives of a body (with the exception of proscribed groups or organisations) of which they are a member.

The College's policy, in line with its duty under section 43 of the Education (No. 2) Act 1986, is that any speaker who has been invited to speak at a meeting or other event, on College premises must not be stopped from doing so unless: they are likely to express unlawful speech, or their attendance would lead the host organisation to breach other legal obligations, and no reasonably practicable steps can be taken to reduce these risks. However, all speakers should anticipate that their views might be subject to robust debate, critique and challenge.

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External speakers who are known to be members of proscribed groups or organisations, or who are likely to encourage support for proscribed groups or organisations under UK law, should not be invited to speak at College events.

The College will not unreasonably either refuse to allow events to be held on its premises or impose special or unreasonable or onerous conditions upon the running of those events. The lawful expression of controversial or unpopular views will not in itself constitute reasonable grounds for withholding permission for a meeting or event.

The College may only restrict speaker events given a reasonable belief that such events are likely to involve speech that violates the law, that falsely defames a specific individual, that constitutes a genuine threat or harassment, that unjustifiably invades substantial privacy or confidentiality interests, or that is otherwise directly incompatible with the functioning of the College. In addition, the College may reasonably regulate speaker events to ensure that they do not disrupt the ordinary activities of the College.

These narrow exceptions to the general principle of freedom of expression are not intended ever to apply in a way that is inconsistent with the College's commitment to the completely free and open discussion of ideas.

Code of Practice on Meetings and Public Gatherings on College Premises

Adopted by Governing Body in March 2021

Review Date: Lent Term 2024

Note

This Code should be read alongside the following College Policies:

- Management of External Events and External Speakers
- Code of Practice regarding Elections and Party Political Activity

Section 43 of the Education (No2) Act 1986, referring to freedom of speech in universities, polytechnics, and colleges, requires the College to issue and keep up to date a code of practice to be followed by all Fellows, staff and students of the College for the organisation of meetings and other events which are to be held on College premises, and for the conduct required of Fellows, staff and students of the College in connection with such meetings and events. This Code of Practice therefore applies to all Fellows, staff and students of the College, in respect of all College premises, whether indoors or outdoors.

College Policies and Procedures

The Code should be read in conjunction with the University Statement on Freedom of Speech.

Fellows, staff and students of the College are reminded that alleged breaches of the general regulations for discipline or of the rules of behaviour applicable to current registered students or of any relevant conditions of employment may be brought before the relevant disciplinary authority.

Authority and approval processes for meetings and events on College premises

Any meeting or event on College premises should have at least one organiser who is responsible for the meeting or event and is a Fellow, member of staff or student of the College. If a meeting or event is proposed by an external group or individual without such an organiser, it may only proceed on condition that an individual to whom this Code applies is identified or nominated as the organiser responsible for the meeting or event.

Authority is required for meetings and events to be held on College premises, whether indoors or outdoors. It is anticipated that, in the vast majority of cases, the authority in question will straightforwardly consider the request as part of normal business. However, in the exceptional circumstances that the authority in question considers that the holding of the meeting or event might reasonably be refused because of the duty to prevent people from being drawn into terrorism or for some other valid reason as indicated in the College's Statement on Freedom of Speech, there is a process of escalation to the College Officers. Only the College Officers may refuse permission in this way and on these bases.

The request should be forwarded to the College Officers with a statement of the concerns. This referral should be made at least seven working days in advance of the proposed meeting or event. Members of the College who are concerned that a particular forthcoming meeting or event should be escalated to the College Officers may do so directly. The College Officers will, in consultation as necessary, determine whether the meeting or event can go ahead as originally planned, or in alternative premises, at a later date, or in a different format. Only in exceptional circumstances, when there are risks which cannot be mitigated or the event organiser refuses to meet any conditions imposed, will permission be withheld. An organiser who is unhappy with the College Officers' decision has the right of appeal to Council.

Any decision by the College Officers (including one upheld on appeal) that a meeting or event should not take place, or may only take place subject to conditions, is binding and

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takes precedence over any other decision which may have been taken by any other body or officer in the College.

Organisation and management of meetings and events on College premises

Once approved, the organisers of meetings and events must comply with any conditions set by the College authority concerned for the organisation of the meeting or event. Such conditions may include the requirement that tickets should be issued, that an adequate number of stewards or security staff should be available, that the the Police should be consulted and their advice taken about the arrangements, and that the time and/or place of the meeting should be changed. The cost of meeting the conditions, and the responsibility for fulfilling them, rests with the organisers.

Other legal considerations

The attention of organisers of meetings and events is drawn to sections 11 and 14 of the Public Order Act 1986, concerning the conduct of processions and assemblies. Other legal requirements may also affect the conduct of meetings and events. These include incitement to violence, to breach of the peace, or to racial hatred. Meetings and events, even if directed to lawful purposes, cease to be lawful if they cause serious public disorder or breach of the peace. Attention is also drawn to the provisions of the Licensing Acts. These Acts require the licensee to maintain good order on licensed premises, and give the licensee the power to expel persons from the premises if they consider it necessary.

The application of this Code

Any person who is in any doubt about the application of this Code to any meeting or event in the College must consult the Events Manager, who, in consultation with the Bursar, will determine whether the provisions of the Code apply.

Adopted by Governing Body in March 2021

Review Date: Lent Term 2024

Note

This Code should be read alongside the following College Policies:

College Policies and Procedures

- Management of External Events and External Speakers
- Code of Practice regarding Elections and Party Political Activity

Section 43 of the Education (No2) Act 1986, referring to freedom of speech in universities, polytechnics, and colleges, requires the College to issue and keep up to date a code of practice to be followed by all Fellows, staff and students of the College for the organisation of meetings and other events which are to be held on College premises, and for the conduct required of Fellows, staff and students of the College in connection with such meetings and events. This Code of Practice therefore applies to all Fellows, staff and students of the College, in respect of all College premises, whether indoors or outdoors. The Code should be read in conjunction with the University Statement on Freedom of Speech.

Fellows, staff and students of the College are reminded that alleged breaches of the general regulations for discipline or of the rules of behaviour applicable to current registered students or of any relevant conditions of employment may be brought before the relevant disciplinary authority.

Management of External Events and External Speakers

Adopted by Council: May 2016

Review Date: Easter Term 2021

Committee Ownership: Domestic & Estates

Context

1. Colleges are required to have written procedures to demonstrate their compliance with their new legal duties as set out in the Counter-Terrorism and Security Act 2015 and the Prevent duty guidance issued by government. In particular, they are required to have written procedures on how they manage the risk assessment and subsequent management of "external events", which in this context relates to scheduled or advertised meetings or activities that include visiting speakers (i.e. speakers who are not members of the University or one of the Colleges) and/or significant numbers of attendees from outside of Collegiate Cambridge.

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2. This applies, for example, to student society events hosting a visiting speaker held in College or elsewhere, and to external bookings made with the College (e.g. graduate seminars, alumni events and conferences).

Principles

3. The College is strongly committed to the principle of freedom of speech and expression and will have a published statement to that effect: this must be referenced in an appropriate place for those seeking to book College rooms for an external event: students who take the lead in managing College student societies (including but not limited to the JCR and MCR) should have it brought to their attention.
4. This document outlines key elements of written procedures for:
 - the management of external events at which controversial views may be expressed (whether or not they are held at the College); and
 - the management of visiting speakers at meetings held within the College.

Approval and risk management of events

5. At enquiry, the Events Office will clarify the:
 - a. Type of booking e.g. -Student/Departmental/Research/Commercial
 - b. Purpose of booking e.g. -lecture/debate/networking/sales/training
 - c. Target audience
6. At provisional booking stage, the Events Office will:
 - a. Identify information required before confirmation of the event can be given
 - Title of the event
 - Detailed summary of event Topics
 - b. Follow up for additional information if concern is given over the subject matter
 - Identity of the presenters
 - Breakdown of expected target audience demographic with evidence from previous events
 - c. Researching details of their event and organisation/s online.

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- d. Highlighting the Prevent Statutory Duty within the provisional booking letter.
 - e. Point clients to the section of the T&Cs in the provisional letter, with permanent paragraphs that appear on every letter
7. At confirmation stage
- a. Make reference to the Counter Terrorism and Security Act 2015 and Prevent Statutory Duty within our Terms and Conditions and what due diligence consists of.
 - b. Identify our right to cancel and if we believe event details change without sufficient time to carry out our due diligence.
 - Clients will be pointed to this section of the T&Cs in the confirmation letter, with permanent paragraphs that appear on every letter.
8. Pre-event day
- a. We will monitor all events, as we currently do, for timely payments and consistent and complete information provided on request and at least 10 days before their event start date (as required by our T&Cs).
 - b. If this information is not provided within the time-frame, the event will be deemed to be cancelled by the client or student and we will communicate this decision.
9. On the event day, we will advise clients that a member of staff from the College may, at any time, listen to their event as it takes place and read any associated literature on or off-line.
10. The nominated members of staff (Events team) are confident to ask more questions about the booking, have conversations with the person making the booking and conduct additional research should the information provided at any stage raise any concern.
11. Events that are planning to discuss controversial views will be subject to risk assessments to ensure that the risks can be fully mitigated whilst allowing for free speech. If the risks cannot be mitigated, the event will not go ahead.
12. Activities likely to be considered inappropriate to be conducted on College premises include:
- internal or external speakers giving talks which directly or indirectly promote violence towards members of the College or the general public, or which

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may advance the radicalisation of College members (as it is defined in the Colleges' statement on freedom of speech);

- internal or external speakers whose presence or activity, in the view of the College, carries a reasonable likelihood of risk to the health or safety of its members or of the general public;
- physical activities where there has not been due regard for the safety of participants and onlookers;
- activities where the College has been advised by the police that they represent a high risk at the specified time or location proposed.

13. Risk: We can have written confirmation from the organiser that nothing to contradict the Counter Terrorism and Security Act 2015 will occur, however we would only know that something controversial has occurred if it is reported by someone in attendance at the event.

Code of Practice regarding Elections and Party Political Activity

Current Version Adopted by Council: May 2017

Review Date: May 2023

Committee Ownership: Council

The College's objectives are learning, education and research and maintaining a College for students to study for degrees in the University. Party political campaigning does not support the delivery of these objectives and therefore, in accordance with Charity Commission guidance, the College may not engage in it. As a consequence of this, the public display of party political posters within public spaces within the College (including College houses) or via electronic media controlled by the College and similar or related party political activities are not permitted. Students are reminded that MECSU and the MCR are statutory bodies of the College and therefore also represent the College for these purposes.

However, the College's policies on freedom of speech do not prevent the holding of events by members on the College's premises subject to the College's normal decanal processes for the approval and holding of meetings and "Prevent" duty procedures. Also College members may display material in their rooms (subject to the terms of room licences generally).

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In relation to handling electoral communications and canvassing:

1. Electoral communications received by post will be dealt with in the same way as other post received by the College for its resident members.
2. Door-to-door delivery of written material is not permitted with the College or College houses.
3. Written material relating to an election issued by a candidate's agent may be delivered to the Porter's Lodge. It will then be made available to resident members by being placed in common rooms, but will not be put into individual pigeon holes.
4. Door-to-door canvassing is not permitted in Colleges or College houses.

College Policy on Harassment & Sexual Misconduct

Adopted by Council in November 2019

To be reviewed in Michaelmas Term 2022

Murray Edwards College is committed to providing a safe environment in which all members of the College can participate freely and contribute fully to the life of the College, University and city without fear for their personal security. A safe environment, free of harassment or threat, is fundamental to the academic and social life of our community here in College and within the wider University. Sexual harassment and misconduct will not be tolerated. All members of the community must treat each other with respect and there must be a clear understanding of the types of behaviour which are inappropriate and unacceptable. The College will support and assist the victim of any harassment or assault.

Harassment

In line with the University, the College defines harassment as single or repeated incidents involving unwanted or unwarranted conduct towards another person which it is reasonable to think would have the effect of (i) violating that other's dignity or (ii) creating an intimidating, hostile, degrading, humiliating, or offensive environment for that other.

Harassment may be verbal, psychological or physical, in person or via a virtual platform or through other methods of contact.

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Unacceptable behaviour, whether intentional or not, can take a variety of different forms.

Behaviour is defined as inappropriate if:

- it is unwanted by the recipient;
- it is perceived by the recipient as violating their dignity and/or creating an intimidating, hostile, degrading, humiliating or offensive environment; and
- the behaviour could reasonably be considered as having that effect having regard to all the circumstances, including the recipient's perception.

These definitions apply whether or not there was an intention to cause the effect.

Unacceptable behaviour may include a number of specific behaviours - such as bullying or harassment on account of

- age
- disability
- gender reassignment
- marriage and civil partnership
- pregnancy and maternity
- race
- religion or belief
- sex
- sexual orientation

Behaviour that may appear trivial as a single incident can constitute harassment or bullying when repeated.

Online harassment may take the form of intimidating, offensive or graphic posts on social media sites or chat rooms, or communications by email, text or instant messaging.

Sexual Misconduct

Sexual misconduct includes (but is not limited to) the following, whether or not within a sexual or romantic relationship, including where consent to some form of sexual activity has been given and then withdrawn, or if consent has been given on previous occasions:

- sexual intercourse or engaging in a sexual act without consent;
- attempting to engage in sexual intercourse or a sexual act without consent;
- sharing private sexual materials of another person without consent;
- kissing without consent;
- touching inappropriately through clothes without consent;
- inappropriately showing sexual organs to another person;
- repeatedly following another person without good reason;
- making unwanted remarks of a sexual nature.

Environmental Issues

Adopted: March 2021

Review Date: Lent Term 2024

Committee Ownership: Domestic & Estates

The College aims to manage its activities and buildings to promote environmental sustainability, to conserve and enhance natural resources and to prevent environmental pollution.

The College will comply fully with environmental legislation and will make continued efforts:

- to promote sound environmental management policies and practices;
- to increase awareness of environmental responsibilities amongst staff and students;
- to work with other agencies locally, nationally, and internationally to promote appropriate environmental policies;
- to implement policies and procedures that contribute to a reduction in the College's carbon footprint having regard to the need for prudent use of financial resources;
- to minimise waste and pollution, and to operate effective waste management procedures;
- to reduce the consumption of fossil fuels;
- to reduce water consumption;
- to promote a purchasing policy which will have regard to those products and services which cause the least harm to the environment bearing in mind the financial impact;
- to avoid use, wherever possible, of environmentally damaging substances, materials, and processes;
- to maintain the grounds and buildings of the College in an environmentally sensitive way;
- to have regard to environmental factors as far as practicable in respect of the growth of the College and the integration of new developments into the local environment.

Smoking Policy

December 2019

Purpose

This policy has been developed to protect all Fellows, staff employees, students, conference delegates and visitors to the College from exposure to secondhand smoke and to ensure compliance with the Health Act 2006. Exposure to secondhand smoke increases the risk of lung cancer, heart disease and other serious illnesses. Ventilation or separating smokers and non-smokers within the same airspace does not completely stop potentially dangerous exposure.

Policy

It is Murray Edwards College policy that all our College buildings are smokefree, and all employees have a right to work in a smokefree environment. Smoking is prohibited in all enclosed and substantially enclosed premises. This policy applies to all Fellows, staff employees, students, conference delegates and visitors to the College.

Implementation

Overall responsibility for policy implementation and review rests with the College Health & Safety Officer. However, all members of the College and visitors are obliged to adhere to, and support the implementation of the policy. Appropriate 'no-smoking' signs will be clearly displayed at the entrances to and within the college premises.

Help to Stop Smoking

The NHS offers a range of [free services](#) to help smokers give up.

College Statement on Ethical and Environmental matters with examples of practice

Adopted by Council: 26 November 2018

Review Date: Michaelmas Term 2021

Committee ownership: Council

College Policies and Procedures

Matters of ethical and environmental policy touch many areas of the College's activities. This statement highlights principal policies and gives some examples of practice.

Overall statement on ethical principles

The guiding principles of the College are the Nolan principles and business shall be conducted in accordance with them: selflessness, integrity, objectivity, accountability, openness, honesty and leadership.

Personal integrity

As this is fundamental to the College's ethical conduct, the remainder of the policy is re-stated here in its entirety.

Staff and Fellows must not use their authority or office for personal gain and must always seek to uphold and enhance the standing of the College.

Staff and Fellows must declare to their Head of Department any personal interest which may affect any College business and act in accordance with the instructions given as to management of any conflict.

Members of Council are required to complete an annual declaration of interests and eligibility to be a trustee.

Where staff or Fellows have a conflict of interest they must seek the written advice of the person to whom they are responsible, for example the Bursar or the President, and act as advised.

In relation to the receipt of gifts of hospitality the College's Anti-Bribery Policy shall apply.

Investment

In relation to environment, social and governance matters, the Investment Policy states the College exercises its investment powers in accordance with the fiduciary duties pertinent to charity trustees, i.e. it exercises them primarily in the best interests of the College and to support financially its objects of education, learning, and research and maintenance of a College. The outcome of the policy is that the majority of the College's assets are managed according the ethical policy of the COIF Charities Investment Fund. An extract of the policy applying at the date of this document is shown in the appendix.

Fund-raising

In relation to fund-raising activity, the College adheres to the Institute of fundraising's Code of Fund-raising Practice and in addition it is registered with the Fundraising

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Regulator, thereby subscribing to its terms and conditions including the Fundraising Promise, subject to amendment of certain of the standard requirements as agreed with the Fundraising Regulator in a side letter governing the particular circumstances of Cambridge Colleges.

In relation to donations and gifts the College applies its Ethical guidelines for the acceptance of gifts and donations.

Operational activities

The College's Policy on Operational environmental issues addresses the manner in which the College approaches environmental concerns in its day-to-day operations in running its physical activities.

Examples of the application of these principles are available and the following important comments are reproduced here:

- **Living Wage:** In setting pay for staff, the College has regard to The Living Wage Foundation's recommendation of an hourly rate of pay. The College reviews and adjusts pay, every year on 1st August ensuring that no staff are paid less than the Real Living Wage. Additionally, any increases to the Real Living Wage occurring during the year are implemented within the recommended timeframe.
- **Food waste:** It is inevitable waste will occur in making sure there is enough food for unpredictable demand, and there tends to be more waste where more choice is provided. The College does what it can to minimise waste. This involves planning how excess food can be used in other meals if there is greater supply of some dishes than there is demand, but always with food safety in mind. Inevitably, there will be food which can't be used in this way, along with the waste from people's plates. We generally send this for bio-digestion which results in the production of fuel and fertilisers.
- **Energy:** The College encourages students to engage in good energy habits. For example, the Student Switch-Off Campaign encourages turning off lights, heating and electric appliances including computers when they are not in use. The College participates in college-wide energy purchasing and in October 2017 this enabled many electricity supplies to be switched to a provider which purchases 99% of its electricity from "green" renewable resources, including wind, biomass similar sources of electricity.

Appendix

Extract of the college's investment policy

"6.1 The College exercises its investment powers in accordance with the fiduciary duties pertinent to charity trustees, i.e. it exercises them primarily in the best interests of the College and to support financially its objects of education, learning, and research and maintenance of a College.

6.2 However, in addition to the level of investment return, it addresses the following considerations:

6.2.1 It does not invest in activities that are illegal or contravene international conventions;

6.2.2 It does not invest in businesses that would create a patent or reasonably self-evident conflict with the College's objects;

6.2.3 It takes into account environmental, social and governance considerations, where doing so is consistent with the financial interests of the College, for example it may choose to avoid investments that are seen as having the potential to deter supporters, benefactors or beneficiaries if on balance alienating these groups would cause greater financial harm than the decision to avoid the investments in question;

6.3 In addition, the College may incorporate a specific ethical policy into its investment strategy, providing it does not entail material financial detriment and it does so by considering favourably, in its choice of investment managers, those which have strong ethical policies and where the managers have also generated excellent financial returns over the long term.

6.4 The Investment Committee review regularly their investment managers' policies on corporate governance as well as social, environmental and ethical investment."

Extract from the scheme particulars for the COIF Charities Investment Fund as at November 2017

"Client-driven ethical exclusions prohibit investment in companies:

producing landmines or cluster bombs

with significant (>33%) turnover relating to tobacco, online gambling or the production of pornography.

In addition, remaining companies that continue, after persistent engagement, to violate international and/or industry norms in relation to the following will be excluded:

public health in the UK (alcohol and food)

human rights, employment standards and climate change disclosure (relevant companies in developed markets).

This policy also applies to bonds issued by these companies. The Fund also takes a positive approach to stewardship as defined in the UK Stewardship Code for Institutional Investors. The Manager's response to this code and its voting and engagement records are available at www.ccla.co.uk. The Manager is also a signatory to the United Nations backed Principles for Responsible investment.”

For more information see the scheme particulars.

Investment Policy

Adopted by Council: February 2020

Review Date: Michaelmas Term 2023

Introduction

1.1 The College’s investment assets are divided between (a) long term endowments, corporate capital and reserves (“Long-Term Funds”) which should be invested to provide income and capital growth or a total return sufficient to support spending requirements and maintain a capital value at least in line with inflation over the long term; and (b) shorter term endowments and other funds which should be invested emphasising certainty of value and ready availability (“Short-Term Funds”).

1.2 The spending rule for funds invested for total return is reviewed and agreed by the Investment Committee annually at a meeting in the Lent term.

Investment Objectives

2.1 The College seeks to produce the best financial return within an acceptable level of risk.

2.2 The investment objective for Long-Term Funds is to generate a return, net of expenses associated with managing the funds, which

2.2.1 is in excess of inflation over the long term and

2.2.2 generates income or sustains withdrawal (as the case may be) sufficient to support the ongoing activities of the College:

2.2.2.1 at a level which is reviewed annually by the Investment Committee and

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Finance Committee;

2.2.2.2 does not prejudice long term capital preservation in real terms; and

2.2.2.3 complies with relevant donation agreements or terms of trusts.

2.3 The investment objective for Short Term Funds is to preserve the capital value with a minimum level of risk. Assets should be sufficiently liquid to meet anticipated cash requirements.

2.4 The College is either permitted or required to adopt a total return approach on a substantial proportion of its assets. The total return approach generates the investment return from (a) income (whether accrued or received) and (b) capital gains or losses (whether realised or unrealised); less (c) the costs of management (accrued or paid). For Long-Term Funds within this category, it is expected that, if in any one year the total return on the investments is insufficient to meet the budgeted expenditure or spending rule applicable to the funds, then the real value of the portfolio over the long term will still be maintained, in accordance with the investment objective above. Conversely, returns in excess of the spending rule applicable to the funds will be retained to achieve those investment objectives.

2.5 For a small proportion of its Long-Term Funds, the terms of the trusts require that the College may only spend the income generated. The maintenance of the capital value of such funds is of greater importance than short-term income requirements. It is the medium-term intention of the College to make the constitutional and governance changes required to permit a total return approach to investment of these funds.

Risk

3.1 The College's principal financial risks and uncertainties relate to being under-capitalised in an uncertain economic environment, while facing the challenges of the higher education sector.

3.2 A key risk to the Long-Term Funds is inflation and these assets should be invested to mitigate this risk over the long-term. The key risk to the Short-Term Funds is financial security because they are expected to be required within a short timeframe and these assets should be invested to achieve this goal.

3.3 The College's assets may be invested widely and should be diversified by asset class and security. The Investment Committee is charged with agreeing a suitable asset allocation strategy for the funds with the investment managers.

3.4 The College's expenditure and the base currency of the investment portfolio is sterling. Investment within the portfolio may be made in non-sterling assets. Currency

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hedging is permitted in order to reduce the portfolio's exposure to negative currency fluctuations against sterling.

3.5 The College's management of its operational cash balances is contained within a separate policy.

Liquidity

4.1 The Investment Committee reviews the capital and income withdrawal required from the funds annually based on budgeted expenditure and spending rules for funds invested for total return and it addresses the liquidity considerations which arise from these requirements.

4.2 The College operates a substantial income earning business in the form of academic fees, charges for the provision of accommodation and catering to students and for commercial conferencing. The College manages its operational cash requirement by reference to regularly updated cash flow forecasts. This is considered to fulfil the requirements of the Charities Commission guidance CC19 in relation to the potential maintenance of a specific balance of reserves invested for short-term liquidity.

Time Horizon

5.1 The College is expected to exist in perpetuity and the Long-Term Funds should be managed in accordance with the investment objective in paragraph 2.2. in order and to ensure its sustainability.

Responsible Investment

6.1 The College exercises its investment powers in accordance with the fiduciary duties pertinent to charity trustees, i.e. it exercises them primarily in the best interests of the College and to support financially its objects of education, learning, and research and maintenance of a College.

6.2 In addition to the level of investment return, it addresses the following considerations:

6.2.1 It seeks not to invest in activities that are illegal or contravene international conventions;

6.2.2 It seeks not to invest in businesses that would create a patent or reasonably self-evident conflict with the College's objects;

6.2.3 It takes into account environmental, social and governance considerations, where doing so is consistent with the financial interests of the College, for example it may choose to avoid investments that are seen as having the potential to deter supporters, benefactors or beneficiaries if on balance alienating these groups would cause greater financial harm than the decision not to avoid the investments in question;

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6.3 In its choice of investment managers, the College favours those which have strong responsible investment policies and where the managers have also generated excellent financial returns over the long term.

6.4 The Investment Committee review regularly their investment managers' policies on corporate governance as well as social, environmental and ethical investment.

Management, Reporting and Monitoring

7.1 The College appoints managers to manage financial assets on a discretionary basis in line with this investment policy. The College has nominated a list of authorised signatories, two of which are required to sign instructions to the investment manager.

7.2 The College appoints advisers to advise on individual property assets.

7.3 The College appoints professional custodians to provide custody for quoted investments managed on a discretionary basis.

7.4 The investment managers of financial assets will provide the following information on at least a quarterly basis: valuation of investments, transaction report, cash reconciliation, performance analysis and commentary.

7.5 The Investment Committee, chaired by the President, has oversight of and monitors the investment assets. The Committee meets once a term and will review the information provided by the investment managers at each meeting. The investment managers of active portfolios will be required to present in person to the Committee as the Committee sees fit, normally on a termly basis.

7.6 Performance of the Long Term Funds will be measured against inflation and agreed market indices. The return of the Short Term Funds will be monitored against benchmark cash rates.

Approval and Review

8.1 This Investment Policy Statement will be reviewed on an annual basis to ensure continuing appropriateness.

Reserves Policy

Adopted by Council: November 2019

Review Date: Michaelmas Term 2023

Committee Ownership: Finance Committee

The College intends to continue to pursue its objects in perpetuity. Its activities require financial support from funds, which include the College's corporate capital, its endowments, and its restricted and unrestricted reserves. These funds are necessary to continue to underpin the significant public benefit provided by the College in pursuance of its objects in the areas of learning, education and research.

Free reserves are those reserves which are freely available to spend on any of the College's objects and as such exclude unexpendable reserves, reserves applied to tangible fixed assets and reserves designated for or restricted to a certain purpose or purposes.

The College considers a suitable minimum level of free reserve to be an amount broadly equivalent to six months' essential operational spend, currently £4m. Such reserves will provide support should the College face an unforeseen downturn or significant event which has an adverse financial impact.

The College intends to increase its contribution to public life and benefit and intends to grow its reserves as it seeks opportunities to do so. The College has not therefore determined a maximum level of free reserves.

The policy and compliance with this policy is reviewed annually and particularly in the event of material change, upwards or downwards, in the level of free reserves. The College has complied with the policy in all material respects during the financial year 2018-19.

Ethical Guidelines for the Acceptance of Gifts and Donations

Adopted by Council: May 2023

Review Date: Easter Term 2026

1. Murray Edwards College was founded on [benefaction](#), and to advance the College's mission and strategic objectives we will seek philanthropic support or sponsorship which is aligned with our values, strategic goals and financial needs, as a legitimate, sustained and vital component of our income. Such support may be sought and accepted from

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alumnae, friends, organisations, companies and charitable trusts and foundations. The acceptance of benefactions can give rise to ethical considerations.

2. The College is registered with [The Fundraising Regulator](#) (FR) which sets out a Code of Practice for fundraising, including standards on accepting, refusing and returning donations. The FR, the [Charity Commission](#) and the Chartered Institute of Fundraising all highlight the importance of registered charities establishing clear policies and the requirement of trustees to act in the best interests of the charity (1). The Council for Advancement and Support of Education ([CASE](#)) provides guidelines and principles for UK universities to consider when developing policies and procedures with regard to the criteria that determine whether any particular benefaction should be accepted from any particular benefactor (2). Reflecting on all the guidelines provided this paper outlines the set of ethical principles under which the College will or will not pursue potential benefactions, and establishes procedures in the case of potentially controversial gifts or donors.

3. The following questions will be considered by Development Office staff in the context of all benefactions proposed or received:

- Is the proposed gift or sponsorship consistent with the College's mission, strategic plan and values, as determined by the College Council?
- Is the proposed gift or sponsorship in support of or for a current or agreed/approved College activity or project?
- If there are stipulations attached to the proposed gift or sponsorship, have the implications of accepting these been assessed (e.g., time and resources required for delivering the stipulations) and considered appropriate?
- By accepting the proposed gift or sponsorship is there a possibility that it will expose or put any College staff or Fellows, students, visitors or other members of the public at serious risk (for example, from protests)?
- Has the gift or sponsorship or a previous gift or sponsorship from this donor or organisation previously been refused by the College or University for any reason?
- Is there published or other credible evidence that the benefaction will be or has been made from a source that arises in whole or in part from an activity that:
 - Evaded taxation or involved fraud?
 - Violated international conventions that bear on human rights?
 - Suppressed or falsified academic research?
 - Was linked in any way to bribery of a member of the College or any other person?

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- Is there evidence that the proposed gift or sponsorship, or any of its terms will:
 - Require action that is illegal or non-compliant with Charity Commission guidance?
 - Limit freedom of enquiry?
 - Limit independence or freedom of decision making for the College?
 - Suppress or falsify academic research?
 - Seriously damage the reputation of the College or the University of Cambridge?
 - Create unacceptable conflicts of interest for the College or the University of Cambridge?
 - Led to an undue and inappropriate third-party influence, or impression of such influence, on institutional decisions of the College?
 - Harm the College relationship with other benefactors, partners, potential students or research supporters?
- Is there any question that the identity of the ultimate donor is undisclosed or that the apparent donor is an agent of an undisclosed principal?
- In line with the policy of the University, the College will not accept funding from sources where to do so would be incompatible with its commitment to address climate change through a transition to a zero carbon world. The guidelines agreed by the University Committee on Benefactions and External and Legal Affairs (CBELA) will apply.

Procedure

4. For all gifts with a value of over £10,000, and any company/corporate donations or sponsorships, the Director of Development will undertake necessary research and due diligence. The Director of Development is authorised to make an acceptance decision on any gifts where there are no concerns up to the value of £100,000. If any prospective gift should give rise to potential concerns over its acceptance the procedure to determine a decision is as follows:

- a) If s/he has any concerns regarding gifts at any level, the Director of Development will, at an early stage in discussions, seek advice from the College Officers.
- b) All gifts at the level of above £100,000 will be tabled for discussion by the College Officers. If there are no concerns, then the College Officers are authorised to make an acceptance decision.
- c) Where there are concerns and the gift is above £100,000 the Director of Development will convene a Gift Acceptance Meeting comprised of the President,

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Bursar and at least two other Fellows from the Gift Acceptance Group. The Gift Acceptance Group consisting of six Fellows will be appointed by Council for a three-year term. Fellows appointed to the group may be called upon at any point in the year. A decision on gift acceptance may be made at the Gift Acceptance Meeting or can be referred for further discussion within a meeting of the College Council.

- d) The Gift Acceptance Group may decide to consult an external body for their advice and information which will then be reviewed by the College Council.
- e) The final decision on gift acceptance where there may be a concern lies with the College Council.

Freedom of Information

FOI Publication Scheme Introduction

This page describes the Publication Scheme, in accordance with the Freedom of Information Act (2000).

This publication scheme follows the model prepared and approved by the Information Commissioner.

This College makes information available to the public as part of its normal activities. The information covered is included in the classes of information mentioned below, where this information is held by the College.

The College intends:

- to publish or otherwise make available as a matter of routine, information which is held by the authority and falls within the classifications below
- to specify the information which is held by the College and falls within the classifications below
- to publish or otherwise make available as a matter of routine, information described in this scheme
- to publish the methods by which information is routinely made available so that it can be easily identified and accessed by members of the public
- to review and update on a regular basis the information the authority makes available under this scheme
- to produce a schedule of any fees charged for access to information which is made available
- to make this publication scheme available to the public

Classes of Information

- Governance
- Strategic Direction
- [Policies & Procedures](#)
- Lists & Registers
- Services

The classes of information will not generally include:

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- Information the disclosure of which is prevented by law, or exempt under the Freedom of Information Act, or is otherwise properly considered to be protected from disclosure
- Information in draft form
- Information that is no longer readily available as it is contained in files that have been placed in archive storage, or is difficult to access for similar reasons

The method by which information published under this scheme will be made available

The College will indicate clearly to the public what information is covered by this scheme and how it can be obtained.

Where it is within the capability of the College, information will be provided on its website. Where it is impracticable to make information available on its website or when an individual does not wish to access the information by the website, the College will indicate how information can be obtained by other means and provide it by those means.

In exceptional circumstances some information may be available only by viewing in person. Where this manner is specified, contact details will be provided. An appointment to view the information will be arranged within a reasonable timescale.

Information will be provided in the language in which it is held or in such other language that is legally required. Where an authority is legally required to translate any information, it will do so.

Obligations under disability and discrimination legislation and any other legislation to provide information in other forms and formats will be adhered to when providing information in accordance with this scheme.

Charges which may be made for information published under this scheme

The purpose of this scheme is to make the maximum amount of information readily available at minimum inconvenience and cost to the public.

Material which is published and accessed on the College's website will be provided free of charge.

Charges may be made for information subject to a charging regime specified by Parliament.

Charges may be made for actual disbursements incurred such as:

- photocopying

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- postage and packaging
- the costs directly incurred as a result of viewing information

Against each entry we have indicated the manner in which the information described will be available. In those instances where a charge applies it will be necessary to supply the Freedom of Information Officer with a stamped addressed envelope with a stamp affixed sufficient for the posting an A4 envelope. If the costs of photocopying and postage are significantly higher, or time required for collation are non-trivial we will contact you with a request for additional payment.

Charges may also be made for information provided under this scheme where they are legally authorised, they are in all the circumstances, including the general principles of the right of access to information held by public authorities, justified and are in accordance with a published schedule or schedules of fees which is readily available to the public.

Written requests

Information held by the College that is not published under this scheme can be requested in writing, when its provision will be considered in accordance with the provisions of the Freedom of Information Act.

Complaints procedure

If you have a complaint, then information is provided.

General Data Protection Regulations

Personal information, its processing and privacy

Purpose and scope

1. The purpose of this policy is to ensure compliance with **data protection law** in the UK (the General Data Protection Regulation and related national legislation). Data protection law applies to the **processing** (collection, storage, use and transfer) of **personal information** (data and other personal identifiers) about **data subjects** (living identifiable individuals).
2. Under data protection law, the College is identified as a **data controller** and as such is subject to a range of legal obligations. For clarity, the University of Cambridge and the other Colleges in Cambridge are separate data controllers, with their own policies and procedures. Sharing of personal information between the University and the Colleges is covered by a formal data sharing protocol.
3. This policy applies to all **staff** and **members** of the college, except when they are acting in a private or external capacity. For clarity, the term **staff** means anyone working in any context for the College at any level or grade (whether permanent, fixed term or temporary) and including employees, retired but active members and staff, visiting Fellows, workers, trainees, interns, seconded staff, agency staff, agents, volunteers, and external members of College committees. Equally, the term **member** includes senior members (Fellows) and junior members (students and alumni) of the College when they are handling or processing personal information on behalf of the College, except when they are acting in a private or external capacity.
4. This policy should be read in conjunction with:
 - College Statutes and Ordinances;
 - staff employment contracts and comparable documents (which outline confidentiality obligations when processing information of the College);
 - policies, procedures and terms of conditions of the College and, where relevant, similar documents of the University of Cambridge with regard to:

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- information security;
 - acceptable use of IT facilities (including use of personal devices);
 - records management and retention;
 - any other contractual obligations on the College or the individual which impose confidentiality or information management obligations (which may at times exceed those of College policies with respect to storage or security requirements – e.g. for funded research).
5. This policy is approved by College Council. It is reviewed at least once every three years. The Council remains responsible for ensuring appropriate resources are in place to achieve compliance with data protection law in line with an appropriate overall risk profile.

Obligations of the College

6. The College upholds data protection law as part of everyday working practices, through:
- a. ensuring all **personal information** (see Annex) is managed appropriately through this policy;
 - b. understanding, and applying as necessary, the **data protection principles** (see Annex) when processing personal information;
 - c. understanding, and fulfilling as necessary, the **rights given to data subjects** (see Annex) under data protection law;
 - d. understanding, and implementing as necessary, the College's **accountability obligations** (see Annex) under data protection law; and
 - e. the publication of **data protection statements** outlining the details of its personal data processing in a clear and transparent manner.
7. The College shall appoint a statutory data protection officer, who will be responsible for:
- a. monitoring and auditing the College's compliance with its obligations data protection law, especially its overall risk profile, and reporting on such annually to the College;

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- b. advising the College on all aspects of its compliance with data protection law;
 - c. acting as the College's standard point of contact with the Information Commissioner's Office with regard to data protection law, including in the case of personal data breaches; and
 - d. acting as an available point of contact for complaints from data subjects.
8. The College shall otherwise ensure all members and staff are aware of this policy and any associated procedures and notes of guidance relating to data protection compliance, provide training as appropriate, and review regularly its procedures and processes to ensure they are fit for purpose. It shall also maintain records of its information assets.
9. Individual members and staff are responsible for:
- a. completing relevant data protection training, as advised by the College;
 - b. following relevant College policies, procedures and notes of guidance;
 - c. only accessing and using personal information as necessary for their contractual duties and/or other College roles;
 - d. ensuring personal information they have access to is not disclosed unnecessarily or inappropriately;
 - e. where identified, reporting personal data breaches, and co-operating with College authorities to address them; and
 - f. only deleting, copying or removing personal information when leaving the College as agreed with the College and as appropriate.

Non-observance of the responsibilities in paragraph 9 may result in disciplinary action against individual members or staff.

10. The obligations outlined above do not waive any personal liability for individual criminal offences for the wilful misuse of personal data under data protection legislation.

Updated: January 2021, Records Manager

Annex

Legal Definition of personal information

Personal information is defined as data or other information about a living person who may be identified from it or combined with other data or information held. Some “special category data” (formerly sensitive personal data) are defined as information regarding an individual’s racial or ethnic origin; political opinion; religious or other beliefs; trade union membership; physical or mental health or condition; sexual life; or criminal proceedings or convictions, as well as their genetic or biometric information.

Data Protection Principles

The data protection principles state that personal data shall be:

- processed (i.e. collected, handled, stored, disclosed and destroyed) fairly, lawfully and transparently. As part of this, the College must have a ‘legal basis’ for processing an individual’s personal data (most commonly, the processing is necessary for the College to operate a contract with them, the processing is necessary to fulfil a legal obligation, the processing is in the legitimate interests of the College and does not override their privacy considerations, or they have consented to the processing);
- processed only for specified, explicit and legitimate purposes;
- adequate, relevant and limited;
- accurate (and rectified if inaccurate);
- not kept for longer than necessary;
- processed securely.

Data Subject Rights

An individual’s rights (all of which are qualified in different ways) are as follows:

- the right to be informed of how their personal data are being used. This right is usually fulfilled by the provision of ‘privacy notices’ (also known as ‘data protection statements’ or, especially in the context of websites, ‘privacy policies’) which set out how an organisation plans to use an individual’s personal data, who it will be shared with, ways to complain, and so on;
- the right of access to their personal data;

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- the right to have their inaccurate personal data rectified;
- the right to have their personal data erased (right to be forgotten);
- the right to restrict the processing of their personal data pending its verification or correction;
- the right to receive copies of their personal data in a machine-readable and commonly-used format (right to data portability);
- the right to object: to processing (including profiling) of their data that proceeds under particular legal bases; to direct marketing; and to processing of their data for research purposes where that research is not in the public interest;
- the right not to be subject to a decision based solely on automated decision-making using their personal data.

Accountability

The College is required under law to:

- comply with data protection law and hold records demonstrating this;
- implement policies, procedures, processes and training to promote “data protection by design and by default”;
- have appropriate contracts in place when outsourcing functions that involve the processing of personal data;
- maintain records of the data processing that is carried out across the College;
- record and report personal data breaches;
- carry out, where relevant, data protection impact assessment on high risk processing activities;
- cooperate with the Information Commissioner’s Office (ICO) as the UK regulator of data protection law;
- respond to regulatory/court action and pay administrative levies and fines issued by the ICO.

Data Processing Statements

Data Protection for Job Applicants

How we use your personal information

This statement explains how Murray Edwards College (“we” and “our”) handles and uses information we collect about applicants (“you” and “your”) for jobs.

In broad terms, we use your data to manage your application to the College and our subsequent recruitment processes.

The controller for your personal information is Murray Edwards College, University of Cambridge, Huntingdon Road, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar (Rob Hopwood) - bursar@murrayedwards.cam.ac.uk

The legal basis for processing your personal data is that it is necessary either in order for you to enter into an employment contract with us or for us to fulfil our legal obligations should we become your employer.

How your data is used by the College

Your data is used by us in the first instance solely for the purposes of considering your suitability for employment and for us to manage our recruitment processes, including our monitoring of equality and diversity within the College. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below.

The College holds the following personal data relating to you, in line with the purposes above:

A* personal details, including name, contact details (phone, email, postal);

B* evidence of your right to work in the UK (e.g. copies of your passport or birth certificate and any relevant visas)

C your application form and associated information submitted by you at that time;

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D other data relating to your recruitment (including references we take up as part of the recruitment process, any pre-employment assessment of you, and any assessment of you at an informal or formal interview);

E* any occupational health assessments and/or medical information you have provided, and related work requirements;

F* information relating to your age, nationality, gender, disability, religion or beliefs, sexual orientation, gender identification and ethnicity;

G any correspondence relating to the outcome of the recruitment process (either successful or unsuccessful).

Those marked with an * relate to information provided by you. Other data and information is generated by us or, where self-evident, provided by a third party.

We will not access personal data about you from social media sites, unless there is a legitimate interest for us to do so (for example, the role you have applied for has a significant public-facing element to it, or is involved with publicity and presenting us to the general public). Consequently, we do not routinely screen applicants' social media profiles but, if aspects of your social media profile are brought to our attention and give rise to concerns about your suitability for the role in question, we may need to consider them.

For certain posts, we may use the Disclosure and Barring Services (DBS) and Disclosure Scotland to help assess your suitability for certain positions of trust. If this is the case, we will make this clear to you in separate correspondence. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information. We recognise that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

Who we share your data with

Information is not shared with other third parties without your written consent.

If you are successful in your application, the data is subsequently held as part of your employment record with us. Where unsuccessful we retain all data and information for no more than 12 months after the closing date of the application process.

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In either case, where the post has required a “resident market test” (needed if the post is open to applicants from outside the European Union), the College will retain the application records of any shortlisted candidates for the duration of the sponsored post and twelve months thereafter.

Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Failure to provide the information reasonably requested of you may result in an automatic disqualification from the recruitment process.

You retain the right at all times to lodge a complaint about our management of your personal data with the [Information Commissioner’s Office](#).

Last updated: January 2021, Records Manager

Data Protection for College visitors and guests

How we use your personal information

This statement explains how Murray Edwards College (“we” and “our”) handles and uses information we collect about visitors, guests and attendees of the College (“you” and “your”), for events and other reasons. In broad terms, we use your information to manage your visit or the event(s) you are attending, including dinners and accommodation and other needs requested by you, as well as to maintain our records of previous, current and future attendees for events management for the College.

The controller for your personal information is Murray Edwards College, Huntingdon Road, Cambridge, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is Rob Hopwood, Bursar:
bursar@murrayedwards.cam.ac.uk

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The legal basis for processing your personal information is that it is necessary in order for you to enter into a contract to provide facilities and resources to you. In many cases, you will be providing the personal information to us alongside consent for us to use that information to provide for your needs or otherwise to provide you with an improved service while you are at the College. We will retain your information for the periods stated below unless or until you request us to do otherwise.

We collect and process your personal information for the following purposes:

- A. maintaining clear contact information for the booking, provision and payment of services. We will hold your name, address, email address, phone number and other relevant contact details you provide to us, and will use this information to maintain contact with you to provide your requested services, manage their delivery and bill you for them. We retain relevant information in our events records for four years after the most recent visit or event you attend. If you are a member of the College (including if you are a former student), we will provide our Development Office with your contact details in order for them to update their records, if you are happy for us to do this.
- B. providing you with necessary and preferred services.

Where relevant, we will also collect data for the provision of services, your reason(s) for attending the event, your nationality and passport details, your car registration, your credit or debit card information and/or any service preferences you request specifically (e.g. room type, dietary requirements, amenities requested). This may include you providing sensitive personal information. We will not retain this information for any longer than necessary for the provision of the specific event or visit, which might require you to provide it on successive occasions.

- C. providing you with details about future College events.

While we retain your contact information, we will contact you about future College events we believe may be of interest to you, providing you have given us explicit consent to do so. Consent may be withdrawn at any time.

- D. fulfilling our legal obligations.

The College is required to keep for 12 months the names and nationalities of all those staying in accommodation. In the case of nationals outside of the UK, Republic of Ireland and the Commonwealth, we must also keep a record of your

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passport details and next destination. The College is also required to keep details relating to any financial transaction for a period of seven years.

We also operate CCTV on our site which will capture footage. Our CCTV policy can be viewed [here](#)

We do not share personal information with third parties. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given above.

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Last updated: 20/03/2019 Lisa Hutchins, Records Manager

Data Protection for Senior Members

How we use your personal information

Murray Edwards College is committed to respecting the privacy of its staff and to ensuring that the personal data that we hold for you is processed in a fair and transparent way in accordance with the Data Protection Act 1998 and the General Data Protection Regulation.

This statement explains how Murray Edwards College ("we" and "our") handles and uses information we collect about our staff ("you" and "your"). For these purposes, "staff" is intended to include employees, workers and casual workers and contractors (e.g. undergraduate supervisors, ad-hoc or temporary catering staff etc.)

The controller for your personal information is Murray Edwards College, University of Cambridge, Huntingdon Road, Cambridge, CB3 0DF. The person responsible for data

protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar (Rob Hopwood) – Bursar@murrayedwards.cam.ac.uk

How your data is used by Murray Edwards College

In broad terms, we use your data to manage your employment with the College, including providing you with your remuneration and statutory benefits, managing your role and the performance of it, and supporting you as an employer, as well as fulfilling our statutory obligations relating to your employment.

For most of the personal data we request from you, the legal basis for processing it, unless otherwise stated, is the fulfillment of **the employment contract** we hold with you. We collect this data from you by means of the new joiner form which we ask you to complete at the start of your employment, plus subsequent correspondence with you, such as updates to your personal details.

In connection with your employment, some of the data we collect and process is so that we can **fulfill our statutory legal obligations**. This data is collected at the start of your employment and updated during your employment, and include:

- your personal identity and contact details (*full name, date of birth, gender, postal address, NI number*) to inform HMRC of your employment with us;
- evidence of your right to work in the UK (*passport, birth certificate, visa*) to comply with immigration law.

The kinds of purposes for which we may use your personal data in order to fulfill the employment contract or in some cases to comply with legal obligations as employer, fall into the following categories:

*Data marked above and below with an * relate to information most probably provided by you, or created in discussion and agreement with you. Other data and information is generated by the College or, where self-evident, provided by a third party.

- Ensuring that you have the right to work for the College:
 - *your recruitment documents* and information (including your application documents);*

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- *other data relating to your recruitment (including your offer of employment and related correspondence, references, and any pre-employment assessment of you);*
- *your nationality and evidence of your right to work in the UK* (e.g. copies of your passport);*
- *the outcome of a Disclosure and Barring Service (DBS) check on you (where relevant to your role).*
- **Paying you and providing you with employment benefits:**
 - *personal details* (full name, postal address, NI number, date of birth, gender)*
 - *your bank details*;*
 - *your current and previous salary (and other earnings e.g. maternity pay, allowances), and your tax information;*
 - *your pension scheme and policy details*;*
 - *your personal details such as may be needed to register you for employment benefits* (e.g. gym);*
 - *sickness certificates, to ensure you are paid appropriately for company or statutory sick pay* (basing our processing of such data on condition (b) of Article 9(2) of the GDPR as this may be classed as special category data);*
 - *your car registration for parking in the College car park* (where applicable);*
 - *correspondence between you and the College, and between authorised staff of the College for legitimate processing purposes, relating to your pay and other remuneration, pension and benefits.*
- **Supporting your employment and your performance in your role:**
 - *personal details* (name, contact details (phone, email, both work and personal));*
 - *your current role description and any previous job descriptions;*
 - *your current (and any previous) contracts of employment and related correspondence;*
 - *any occupational health assessments and medical information you provide relating to your ability to carry out your role and any related work requirements you might need*; (we base our processing of such data on condition (h) of Article 9(2) of the GDPR as this may be classed as special category data,);*
 - *any relevant dietary or religious requirements that might dictate your meal or other requirements as part of the College community (we base our processing of such data on condition (a) of Article 9(2) of the GDPR as this may be classed as special category data,);*

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- *your training and development requirements, requests and qualifications**
 - *any legal undertaking you may be asked to participate in as part of your role.*
- Administering HR-related processes, including records of absences and regular appraisals of your performance and, where necessary, investigations or reviews into your conduct or performance:
 - *a photo of you* for the provision of your College security card and for the staff photo board and in some cases the College website;*
 - *details of your preferred emergency contact* (name, relationship to you and contact details) so that we can contact them in the event that something happens to you or we can't reach you;*
 - *records of your induction programme and its completion;*
 - *records of your performance appraisals with your line manager;*
 - *records, where applicable, of any investigation or review into your conduct or performance;*
 - *records of Health & Safety matters or incidents so that the College can comply with its obligations under Health & Safety law and can maintain a safe and healthy working environment;*
 - *records of roles you might undertake on behalf of the College e.g. in the capacity of First Aider;*
 - *records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave)*
 - *correspondence between you and the College, and between members and staff of the College, regarding any matters relating to your employment and related issues (including but not limited to changes to duties, responsibilities, benefits, your retirement, resignation or exit from College, personal and professional references provided by College to you or a third party at your request).*
 - *details of how your post is funded.*
- Ensuring that you are suitable for certain positions of trust.
 - For certain posts, we may use the Disclosure and Barring Services (DBS) / Disclosure Scotland to help assess your suitability for a position of trust. If this is the case, we will make this clear to you. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage, retention and destruction of certificates and certificate information, recognising that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

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- Disclosing personal information about you to external organisations, as permitted or required by law
 - e.g. submissions to the Office of National Statistics
 - e.g. the police, should you be involved in criminal activity or a criminal investigation

In a small number of cases, we exercise our **legitimate organisational interest** in collecting and / or processing data. This might include *records of your use or take-up of any benefit schemes provided by us to enable us to monitor to review the effectiveness of these benefits and ensure that benefit schemes represent good value for money (both to you and us) and that you do not overuse your entitlements.*

On rare occasions we might monitor social networking sites to ensure compliance with an agreed plan, such as a homeworking agreement but we would only do so if we had informed you in advance that we might do this. In almost all other regards we would not monitor social media sites for any personal data relating to you, but, if aspects of these are brought to our attention and give rise to concerns about your conduct, we may need to consider them. Our social media guidelines are available at: <https://www.murrayedwards.cam.ac.uk/>. We also operate CCTV on our College site which will capture footage. Our CCTV policy is available [here](#).

Please let us know of any concerns or queries you may have relating to any of these purposes, or to how we communicate with you.

Who we share your data with

We share relevant personal data with our sub-contracting agents and with relevant government regulatory bodies (e.g. HMRC or the Office of National Statistics).

We also share your relevant personal details with benefits providers e.g. your pension provider.

We also share personal identification details (your name and date of birth) with the University of Cambridge and / or its component institutions, for example in order to register you with its Information Systems department for an IT account, or to give you access both to the College library and to the University of Cambridge Library, or for membership of Regent House. In addition, the University uses your personal information to monitor, evaluate and support your research activity; for example as part of the Research Excellence Framework ([further details](#)).

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We may also liaise with the University's Training department and likewise with any third party trainers, including on occasions your name and role details, to provide you with training related to your role.

We also share employment related details on a non-identifiable basis with professional advisors, and with inter-collegiate bodies to assess and monitor fair grading, remuneration and employment approach.

Employment related data may be shared, again on an anonymous non-identifiable basis and often in aggregated format, with external bodies for the purposes of monitoring equal opportunities.

Information is not shared with other third parties without your written consent, other than your name, role and employment contact details which are made publically available. Generally, personal data is not shared outside of the European Economic Area.

How we store your data

We hold all information for the duration of your employment and thereafter for up to 12 months in electronic and hard copy. Hard copy information is stored in locked cupboards or cabinets and in locked rooms. Data in electronic format is stored under password protection.

After an initial 12 months we hold personal data on electronic and hard copy archive generally for no more than 10 years after your relationship with the College ends. We reserve the right to retain the personal data longer than the periods stated above where it becomes apparent that there is a need to do so (for example, in the event of a major health or personal injury incident, records may need to be kept for up to 40 years).

Details we hold would be:

- personal details, including name and your preferred personal contact details* (if we still have these);
- your previous salaries and other earnings, pensions and the amounts you have paid in statutory taxes;
- records of your performance appraisals with your line manager;
- absence and attendance records
- records, where they exist, of any investigation or review into your conduct or performance;

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- your reasons for leaving and any related correspondence;
- any references we have written subsequent to your employment with us;
- roles held within College (in certain instances members may be asked to approve the retention of their data for other reasons, for example archival records of College history);
- information about instances, appointments and elections which may be approved by Council and details of which may be kept within council agendas and minutes in perpetuity.

Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them. Failure to provide the information reasonably requested of you may result in disciplinary action taken by the College, which could ultimately lead to your dismissal from employment. You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Last updated: May 2018, HR

Data Protection for Staff

How we use your personal information

Murray Edwards College is committed to respecting the privacy of its staff and to ensuring that the personal data that we hold for you is processed in a fair and transparent way in accordance with the Data Protection Act 2018 and the UK General Data Protection Regulation.

This statement explains how Murray Edwards College ("we" and "our") handles and uses information we collect about our staff ("you" and "your"). For these purposes, "staff" is intended to include employees, workers and casual workers and contractors (e.g. undergraduate supervisors, ad-hoc or temporary catering staff etc.)

College Policies and Procedures

The controller for your personal information is Murray Edwards College, University of Cambridge, Huntingdon Road, Cambridge, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar (Rob Hopwood) – bursar@murrayedwards.cam.ac.uk.

How your data is used by Murray Edwards College

In broad terms, we use your data to manage your employment with the College, including providing you with your remuneration and statutory benefits, managing your role and the performance of it, and supporting you as an employer, as well as fulfilling our statutory obligations relating to your employment.

For most of the personal data we request from you, the legal basis for processing it, unless otherwise stated, is the fulfillment of the contract we hold with you, either a contract of service or a contract for services. We collect this data from you by means of the new joiner form which we ask you to complete at the start of your employment, plus subsequent correspondence with you, such as updates to your personal details or other form to collect relevant details from you when you are engaged to perform services for the college.

In connection with your employment, some of the data we collect and process is so that we can fulfill our statutory legal obligations. This data is collected at the start of your employment and updated during your employment, and include:

- your personal identity and contact details (*full name, date of birth, gender, postal address, NI number*) to inform HMRC of your employment with us;
- evidence of your right to work in the UK (*passport, birth certificate, visa*) to comply with immigration law.

The kinds of purposes for which we may use your personal data in order to fulfill the employment contract (or contract for services) or in some cases to comply with legal obligations as employer, fall into the following categories:

**Data marked above and below with an * relate to information most probably provided by you, or created in discussion and agreement with you. Other data and information is generated by the College or, where self-evident, provided by a third party.*

- Ensuring that you have the right to work for the College:

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- *your recruitment documents* and information (including your application documents);*
- *other data relating to your recruitment (including your offer of employment and related correspondence, references, and any pre-employment assessment of you);*
- *your nationality and evidence of your right to work in the UK* (e.g. copies of your passport);*
- *the outcome of a Disclosure and Barring Service (DBS) check on you (where relevant to your role).*
- **Paying you and providing you with employment benefits:**
 - *personal details* (full name, postal address, NI number, date of birth, gender)*
 - *your bank details*;*
 - *your current and previous salary (and other earnings e.g. maternity pay, allowances), and your tax information;*
 - *your pension scheme and policy details*;*
 - *your personal details such as may be needed to register you for employment benefits* (e.g. gym);*
 - *sickness certificates, to ensure you are paid appropriately for company or statutory sick pay* (basing our processing of such data on condition (b) of Article 9(2) of the GDPR as this may be classed as special category data);*
 - *your car registration for parking in the College car park* (where applicable);*
 - *correspondence between you and the College, and between authorised staff of the College for legitimate processing purposes, relating to your pay and other remuneration, pension and benefits.*
- **Supporting your employment and/or your performance in your role:**
 - *personal details* (name, contact details (phone, email, both work and personal);*
 - *your current role description and any previous job descriptions;*
 - *your current (and any previous) contracts of employment and related correspondence;*
 - *any occupational health assessments and medical information you provide relating to your ability to carry out your role and any related work requirements you might need*; (we base our processing of such data on condition (h) of Article 9(2) of the GDPR as this may be classed as special category data,);*
 - *any relevant dietary or religious requirements that might dictate your meal or other requirements as part of the College community (we base our*

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processing of such data on condition (a) of Article 9(2) of the GDPR as this may be classed as special category data,);

- *your training and development requirements, requests and qualifications**
 - *any legal undertaking you may be asked to participate in as part of your role.*
 - *online identifiers such as IP address to facilitate remote working.*
-
- Administering HR-related processes, including records of absences and regular appraisals of your performance and, where necessary, investigations or reviews into your conduct or performance:
 - *a photo of you* for the provision of your College security card and for the staff photo board and in some cases the College website;*
 - *details of your preferred emergency contact* (name, relationship to you and contact details) so that we can contact them in the event that something happens to you or we can't reach you;*
 - *records of your induction programme and its completion;*
 - *records of your performance appraisals with your line manager;*
 - *records, where applicable, of any investigation or review into your conduct or performance;*
 - *records of Health & Safety matters or incidents so that the College can comply with its obligations under Health & Safety law and can maintain a safe and healthy working environment;*
 - *records of roles you might undertake on behalf of the College e.g. in the capacity of First Aider;*
 - *records of absences from work (including but not limited to annual leave entitlement, sickness leave, parental leave and compassionate leave)*
 - *correspondence between you and the College, and between members and staff of the College, regarding any matters relating to your employment and related issues (including but not limited to changes to duties, responsibilities, benefits, your retirement, resignation or exit from College, personal and professional references provided by College to you or a third party at your request).*
 - Ensuring that you are suitable for certain positions of trust.
 - For certain posts, we may use the Disclosure and Barring Services (DBS) / Disclosure Scotland to help assess your suitability for a position of trust. If this is the case, we will make this clear to you. Certificate and status check information is only used for this specific purpose, and we comply fully with the DBS code of Practice regarding the correct use, handling, storage,

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retention and destruction of certificates and certificate information, recognising that it is a criminal offence to pass this information on to anyone who is not entitled to receive it.

- Disclosing personal information about you to external organisations, as permitted or required by law
 - e.g. *submissions to the Office of National Statistics*
 - e.g. *the police, should you be involved in criminal activity or a criminal investigation*

In a small number of cases, we exercise our legitimate organisational interest in collecting and/or processing data. This might include *records of your use or take-up of any benefit schemes provided by us to enable us to monitor to review the effectiveness of these benefits and ensure that benefit schemes represent good value for money (both to you and us) and that you do not overuse your entitlements.*

On rare occasions we might monitor social networking sites to ensure compliance with an agreed plan with employees, such as a homeworking agreement but we would only do so if we had informed you in advance that we might do this. In almost all other regards we would not monitor social media sites for any personal data relating to you, but, if aspects of these are brought to our attention and give rise to concerns about your conduct, we may need to consider them. Our social media guidelines are available in the staff handbook. We also operate CCTV on our College site which will capture footage. Our CCTV policy is available [here](#).

Please let us know of any concerns or queries you may have relating to any of these purposes, or to how we communicate with you.

Who we share your data with

We share relevant personal data with our sub-contracting agents and with relevant government regulatory bodies (e.g. HMRC or the Office of National Statistics).

We also share your relevant personal details with benefits providers e.g. your pension provider.

We also share personal identification details (your name and date of birth) with the University of Cambridge and/or its component institutions, for example in order to register you with its Information Systems department for an IT account, or to give you access both to the College library and to the University of Cambridge Library.

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We may also liaise with the University's Training department and likewise with any third party trainers, including on occasions your name and role details, to provide you with training related to your role.

We also share employment related details on a non-identifiable basis with professional advisors, and with inter-collegiate bodies to assess and monitor fair grading, remuneration and employment approach.

Employment related data may be shared, again on an anonymous non-identifiable basis and often in aggregated format, with external bodies for the purposes of monitoring equal opportunities.

Information is not shared with other third parties without your written consent, other than your name, role and employment contact details which are made publicly available.

How we store your data

We hold all information for the duration of your employment and thereafter for up to 12 months in electronic and hard copy. Hard copy information is stored in locked cupboards or cabinets and in locked rooms. Data in electronic format is stored under password protection.

After an initial 12 months we hold personal data on electronic and hard copy archive generally for no more than 10 years after your relationship with the College ends. We reserve the right to retain the personal data longer than the periods stated above where it becomes apparent that there is a need to do so (for example, in the event of a major health or personal injury incident, records may need to be kept for up to 40 years).

Details we hold would be:

- personal details, including name and your preferred personal contact details* (if we still have these);
- your previous salaries and other earnings, pensions and the amounts you have paid in statutory taxes;
- records of your performance appraisals with your line manager;
- absence and attendance records
- records, where they exist, of any investigation or review into your conduct or performance;
- your reasons for leaving and any related correspondence;

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- any references we have written subsequent to your employment with us;
- roles held within College (in certain instances members may be asked to approve the retention of their data for other reasons, for example archival records of College history).

Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them. Failure to provide the information reasonably requested of you may result in disciplinary action taken by the College, which could ultimately lead to your dismissal from employment. You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Last updated: January 2021, Records Manager

Data Protection for Students

How we use your personal information

This statement explains how Murray Edwards College (“the College”, “we” and “our”) handles and uses information we collect about those applicants we make an offer of study to, and students once they join the College (“you” and “your”). In broad terms, we use your personal information to manage the ongoing relationship between the College and you as part of our lifelong community of scholars. This includes guiding and supporting your academic studies, maintaining and reviewing your academic progress and pastoral welfare, reviewing your financial commitments to the College and (if you live in College accommodation) managing our relationship with you as a resident.

When changes are made to this statement, we will publish the updated version on our website and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal information is Murray Edwards College, Huntingdon Road, University of Cambridge, Cambridge CB3 0DF. The person responsible for data protection

at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar, Mr Rob Hopwood, (bursar@murrayedwards.cam.ac.uk).

The normal legal basis for processing your personal information is that it is necessary in the performance of one or more contracts with us (including preparing to become a student and member of the College, the expectations on both sides during your course of studies and any related accommodation contract). We have commitments to other external bodies (particularly the University of Cambridge) as part of those contracts, and we outline below (see “*How we share your personal information*”) how and when we ordinarily will share your personal information. For some specific purposes, we may rely on another legal basis, including where we are required for compliance with a legal obligation (e.g. financial records, equal opportunities monitoring), or where we believe it is in our legitimate interest to do so (e.g. to enable your access to external services). You may ask us for further information on these matters at any time if you have specific concerns.

How your information is used by the College

We collect and process your personal information, as specified below, for a number of purposes, including:

- E. maintaining your personal details, including ensuring effective communications with you;
- F. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere;
- G. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere;
- H. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing;
- I. maintaining financial records relating to your studies, your funding and other financial support arrangements;
- J. provision of references to third parties, including retaining information that will allow such references to be meaningful and personalised;
- K. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you;
- L. maintaining a record of any complaints you make to the College and their outcomes;

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- M. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

Further details are provided in the Annex. If you have concerns or queries about any of these purposes, please contact us at the address given below, or speak to the Senior Tutor.

We also operate CCTV on our main College site, which will capture footage. Our CCTV policy can be viewed [here](#)

Please note that if you engage with us for any other purpose (e.g. you work for us, or volunteer for us), there are additional data protection statements that you will be provided with for those other purposes, usually at the first point of engagement.

How long we keep your information for

The Annex outlines specific retention periods for certain categories of information: most of these are determined by legal requirements relating to that specific information.

The College publishes a data retention schedule, which is available on request from the Head of Tutorial.

Finally, we strongly encourage all of our students to remain in touch with the College after they leave and, for that reason, we transfer a subset of this information to our alumnae office who keep this information on a separate, secure database. You are encouraged to read our separate statement about personal information for alumnae, which covers your ongoing lifelong membership of the College at [www.murrayedwards.cam.ac.uk/alumnae/new-hall-society/data-protection-sta....](http://www.murrayedwards.cam.ac.uk/alumnae/new-hall-society/data-protection-sta...)

How we share your personal information

Within the College

We share the following information with relevant people within the College: USN, name, subject, matriculation term, expected graduation term, crsid, Tutor, Director of Studies, pigeonhole number and year of study. Again, this is considered necessary for the College to operate smoothly but you can request a greater level of privacy by contacting the Senior Tutor.

The College shares your email address with the Murray Edwards College JCR (undergraduates) or MCR (postgraduates) for the purpose of facilitating student

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representation and welfare. It may occasionally share other information of relevance, such as your sporting interests or achievements.

The College also takes photographs of its students as a group in a matriculation and graduation photograph. These are used within the College and may be on public display.

Otherwise, the College restricts the sharing of your personal information within the College in line with its [confidentiality policy](#)

With the University

By being a member of a College and registering for a course of study, you are automatically a member of the University of Cambridge. The academic and student support arrangements between the College and the University of Cambridge are complex and varied depending on your course and level of study. Information relating to you (and particularly your academic studies) is shared routinely and often with the University, and the University and its partners (including the College) have a data sharing agreement to govern such interactions and information transfers in both directions, as well as a shared student record system and database.

The personal information shared with the University will include only that which is necessary for you to undertake and complete your studies and your examinations, and in addition will include any information necessary for the College to fulfill its obligations and agreements with the University about the shared University community (including sufficient information for the University to record and collate instances of student behaviour or complaints across all of the Colleges and the University). Where possible, the College will notify you of its intention to share such data in advance.

The University is a separate legal entity from the College and has its own statement about your personal information and its procedures, which you can view at: <https://www.information-compliance.admin.cam.ac.uk/data-protection/student-data>. It in turn shares information with the affiliated student unions and a number of other bodies for statutory and other purposes.

With other organisations

The College routinely shares information with, and receives information from, where appropriate:

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- the Cambridge City Council and other local authorities (to provide evidence of any rights to or exemptions from local services and taxes, including electoral registration and council tax);
- your funding providers or sponsors, as agreed with them and/or you, including the Student Loans Company;
- Universities and Colleges Admissions Service (in relation to your application, offer and requirements to meet any offer of study).

We may also be subject to a legal requirement (with or without your consent) to share your personal information with some government agencies under special circumstances (e.g. relating to crime or health and safety), such as the police or security services or other statutory authorities with investigatory powers. Where possible, the College will notify you of its intention to share such information in advance.

We will normally provide confirmation of your qualifications and other academic references to a prospective employer or financial sponsor if it is reasonably clear that it would be in your interests to do so, and we have made reasonable checks to ensure the information is being requested for that purpose.

We may also provide personal information to agencies and trusted advisers in order to receive professional advice or guidance in relation to a number of matters (examples of such advice include legal and audit services, fee status verification services, intercollegiate agreement services) or to provide services to you through a third party on our behalf. In such circumstances, data sharing agreements are in place to ensure your personal information is not retained by them for longer than necessary or otherwise shared more widely.

The College may share information with organisations overseas as part of arrangements related to your membership of the College (e.g. field trip, student exchange programme, an overseas funding provider). In most cases, this will be related to the operation of a contract.

Publication of your personal information

We would not normally make your personal information publicly available without your consent.

Please also note the University's people search function may also be widened to be accessible to the general public by changing the settings at <http://www.lookup.cam.ac.uk/self>: its default setting is otherwise access to all members

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of the University and all Colleges: we share this because we believe it helps significantly in building community relations and networks and helps others get in touch with you easily.

We would encourage you to be careful when sharing personal information about other students in public social media sites and other similar environments.

Your rights

You have the right: to ask us for access to, rectification or erasure of your personal information; to restrict processing (pending correction or deletion); to object to communications; and to ask for the transfer of your personal information electronically to a third party (data portability).

Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

If you have questions or concerns about your personal information, or how it used, please speak to the relevant College staff in the first instance. If you need further guidance, please contact the Senior Tutor using the details given above.

If you remain unhappy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<https://ico.org.uk/>).

Last updated: 19.4.18

Dr Juliet Foster, Senior Tutor

Annex

We collect and process your personal information, as specified below, for a number of purposes, including:

- A. maintaining your personal details, including ensuring effective communications with you;

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- i. your current name and any previous names you have had;

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- ii. unique personal identifiers (e.g. student number, CRSID, date of birth, photograph);
- iii. your current and previous contact details;
- iv. next-of-kin or emergency contacts.

We will assume that you have obtained permission from your next-of-kin or emergency contact for us to hold their information for that purpose.

- B. maintaining a formal record of your academic progress and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- i. your application details, our assessment of your application and the details of any offer(s) of study we have made;
- ii. records of your academic provision from the College (including supervisions, College examinations and other academic support);
- iii. matriculation and graduation details and records of your academic qualifications (including those prior to becoming a member of the College);
- iv. other details of your academic progress or achievements (e.g. College or University awards or prizes).

Where an award or prize is provided by an external sponsor, we will normally share details about you and your academic performance with them. We also display a list of prizewinners in College immediately after the exam period.

- C. maintaining a formal record of your other engagements with and achievements at the College, the University of Cambridge and elsewhere:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- i. records of your membership of College committees, the Junior Common Room (JCR), Middle Common Room (MCR) and College clubs and societies;
 - ii. awards, prizes and achievements in College or University-related activities (e.g. music, arts, sports etc.).
- D. maintaining a record, where appropriate, of any particular personal needs you require to participate fully in College and University life (including any support

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needs that are, or have been, provided by the College or the University during your course of studies), as well as information about your general health and wellbeing:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- i. details of any disability, illness, and any consequent learning support, social support or other support needs;
- ii. details of any serious risks affecting you (e.g. severe allergies);
- iii. arrangements agreed with you to manage your use of College and University facilities (e.g. computing services, sports facilities, libraries, accommodation, learning spaces), including any special requirements that may be linked to your health or religious beliefs;
- iv. other information to support your health, safety and wellbeing.

We may also retain copies of statements from professional medical advisers, provided either by you or directly to us.

All personal information will be managed in line with our confidentiality policy. We recognise that much of the personal information outlined above is of a sensitive nature and requires a high level of discretion. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

Please note that where you are referred to services not offered directly by the College (e.g., counsellor retained by the College for students' use, the University Counselling Centre and the University's Disability Resource Centre), these support services will have their own data protection statement (or privacy notice) and we advise you pay close attention to these.

- E. maintaining financial records relating to your studies, your funding and other financial support arrangements:

We retain personal information (provided by you or by the University of Cambridge, or created by us), including:

- i. records of your sources of funding support and tuition fee liabilities and, where relevant, records of your accommodation liabilities and other related charges (e.g.

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overhead and IT charges), as well as what monies are to be, and have been, collected by the College on behalf of itself and the University;

- ii. records of any financial support agreed by the University and/or the College (including Cambridge Bursaries, other studentships or awards, additional discretionary funding, benefits or waivers approved by the College);
- iii. where you reside in accommodation owned or managed by the College, copies of any accommodation contract(s);
- iv. where appropriate, your banking details in order to make any payments due to you, and records of such transactions;
- v. records of your College financial account, including balance and transactions;
- vi. copies of any correspondence with you about any of the above matters.

Where this information includes the personal information of others (e.g. parental income evidence), we will assume that you have their permission to provide it to us for our purposes. This information is normally retained until seven years after you complete your studies.

F. provision of references to third parties:

In addition to the information above (and particularly your achievements in B and C above), we retain personal information (provided by you or created by us), including:

- i. records of your advisers, including where relevant your Tutor, Director of Studies and other nominated College personnel who provided you with personal support.

G. maintaining a record of your behaviour and in particular where there has been concerns or complaints raised about you:

We retain personal information (provided by you or by others, or created by us), including:

- i. details of any investigations undertaken by the College into your conduct or behaviour (e.g. disciplinary investigations, fitness to study investigations, complaints made against you);
- ii. a record, including the final outcome, of any investigation of the University into your conduct or behaviour.

The College has several complaints procedures, relating to different matters, and, in all cases, personal information will be managed in line with our confidentiality policy. We recognise that investigations may include information or statements of either a sensitive or

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disputed nature, and that such records require a high level of confidentiality. Wherever possible, we will discuss and agree with you in advance with whom and when we share this information, but reserve the right to disclose information to others in matters relating to significant risks to your health and safety or the health and safety of others.

This information is normally retained until one year after you complete your studies.

- H. maintaining a record of any complaints you make to the College and their outcomes:

We retain personal information (provided by you or by others, or created by us), including:

- i. details of any complaints you have made to the College and their outcomes, where these have been taken through the College complaints procedure.

This information is normally retained until three years after you complete your studies.

- I. maintaining data to enable the College and the University to produce statistics and research for internal and statutory reporting purposes.

It is difficult to provide a comprehensive list, but we retain personal information (provided by you), including:

- i. information relating to “equal opportunities” (e.g. nationality, ethnicity, religious and other beliefs, gender, sexuality, age) in order to fulfill legal requirements of the College or the University;
- ii. information relating to known family, working or social relationships with other members (past or present) of the University of Cambridge or any of the Colleges;
- iii. information relating to your rights to live, work and study in the United Kingdom;
- iv. any criminal record that may affect your status as a student of the University or the College.

If you have concerns or queries about any of these purposes, please contact us, or speak to the Senior Tutor or to the Bursar.

Data Protection for Event Organisers

How We Use Your Personal Information

College Policies and Procedures

This statement explains how Murray Edwards College ("we" and "our") handles and uses information we collect about event organisers that use College facilities ("you" and "your"). In broad terms, we use your information to manage the event(s) we either host for you or otherwise provide facilities, as well as maintain our records of previous, current and future clients for events business for the College.

The controller for your personal information is the Murray Edwards College, New Hall, Huntingdon Road, Cambridge, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar, Rob Hopwood, bursar@murrayedwards.cam.ac.uk.

The legal basis for processing your personal information is that it is necessary in order for you to enter into a contract to provide events facilities and resources to you. We will retain your information for the periods stated below unless or until you request us to do otherwise.

We collect and process your personal information for the following purposes:

- A. maintaining clear contact information for the booking, provision and payment of events.

We will hold your name, address, email address, phone number and other relevant contact details you provide to us, and will use this information to maintain contact with you to provide your requested services, manage their delivery and bill you for them. We retain this information in our events records for six years after the most recent event we host for you, and for seven years in our financial records (due to statutory requirements). Where we have not hosted an event for you, we will retain the details relating to your initial enquiries of services for no more than two years.

- B. providing you with details about future event provision services.
- C. we may collect information when you voluntarily complete customer surveys.

While we retain your contact information, we will contact you about our services. You may unsubscribe from such communications at any time.

We do not share personal information with third parties. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given above.

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We will always hold your information securely. To prevent unauthorised disclosure or access to your information, we have implemented strong physical and electronic security safeguards.

Personal information of delegates of your event

The provision or management of your event by us might require you to provide us with personal information relating to your event delegates (such as name, dietary requirements, accommodation requirements. This may include the provision of sensitive personal information. We will not retain this information for any longer than necessary for the provision of the specific event, which might require you to provide it on successive occasions. We will assume that you have obtained the consent from your delegates for us to hold their personal information for that purpose.

Children: If You are booking on behalf of a child aged under 16, You must have permission of their legal guardian to process their data.

We also operate CCTV on our entire property, which will capture footage. Our CCTV policy can be viewed [here](#).

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them. You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint/>

Last updated: 10/05/18 Chris Pope, General Manager of Residences, Catering and Events.

Data Protection for Alumnae and Supporters

This statement explains how the College (“we” and “our”) handles and uses data we collect about our alumnae and our past, current and future supporters (“you” and “your”) and those who have requested to be kept informed as a Friend of the Women’s Art Collection. In broad terms, we use your data to keep in touch with you as alumnae (as life-

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long members of the College) and supporters, in order to keep you up to date with our activities and developments, to provide services to you, and to identify ways in which you can support us, through donations and/or volunteering your time and expertise.

We will retain your data indefinitely or until you request us to do otherwise. When changes are made to this statement, we will publish the updated version to our website and notify you by other communications channels as we deem appropriate or necessary.

The controller for your personal data is Murray Edwards College, New Hall, Huntingdon Road, Cambridge, CB3 0DF. The Data Protection Officer for the College is Beatrice Jamnezhad at the Office of Intercollegiate Services Ltd (OIS), 12B King's Parade, Cambridge; 01223 768745; college.dpo@ois.cam.ac.uk. OIS should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal data, is the Bursar, Rob Hopwood, bursar@murrayedwards.cam.ac.uk.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms, except where elsewhere in this statement we have indicated otherwise. You may ask us to explain our rationale at any time.

How your data is used by the College

Your data is used by us for a number of interdependent purposes, including alumnae relations, communications and fundraising. These include:

- publications
- surveys
- appeals and requests for donations
- the promotion of alumnae and other College events
- the promotion of other services open to College members

Communications to you may be sent by post, telephone or electronic means, depending on the contact details we hold and the preferences expressed by you about the types of communications you wish to receive. We may use automated or manual analysis to link data together to help us identify your potential for supporting us and/or the University. If

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you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given below.

What data is held by the College

We work closely with the University as a result of their shared interest in having a coordinated approach to their alumni and supporters. We have a separate database from the University, but we also have access to the University's database. The University has its own data protection statement and procedures.

Where provided by you, or provided by the University or obtained from public sources, records may contain:

- details of your school, College and University education
- unique personal identifiers (e.g. student number, date of birth)
- your contact details
- your attendance at College or University events
- other contact with us or the University since graduation
- your key relationships with other alumni or supporters of the College and/or the University and other Colleges within Cambridge
- your career highlights and other life achievements
- financial information relating to you and any of your key relationships (including but not necessarily limited to income, philanthropy and other giving)
- information about donations made by you to either the College or the University
- information about your areas of personal interest
- photographs of you
- personal data provided by you for a specific purpose or purposes (for example disability or catering preferences for event management)
- your communication preferences

Communications

If you are a new contact for our Development Office, we will ask you at the outset how you would like to receive news and other communications from us. If you are already receiving

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such communications, you are able to change your preferences (or ask us to stop sending you news and other communications completely) by email to newhallsociety@murrayedwards.cam.ac.uk. You may request changes at any time.

When the College shares your data with others

We do not sell your personal data to third parties under any circumstances, or permit third parties to sell on the data we have shared with them.

Depending on constraints set by you, and which you may change at any time, we may share any of the above categories of data with the University.

We believe that most alumnae understand in detail the complex and many interactions of the College with the University of Cambridge. Personal data of our members is shared with the University routinely throughout any course of study, and it is our strong preference to continue such collaborative working thereafter.

The University and its partners (including the College) have a data sharing agreement to govern the sharing of personal data of alumni and other supporters. This is necessary because they are distinct legal entities. The agreement outlines that, depending on constraints set by you, and which you may change at any time, the University and College may share any of the above categories of personal data with the University and can be viewed in full at URL. Any transmission of data to or from the University is managed through agreed processes which comply with UK data protection legislation.

For clarity, the College has a separate database from the University, but has access to the University's database: additionally, we maintain other electronic and paper records.

The University has its own [data protection statement and procedures](#).

We share data on a considered and confidential basis, where appropriate, with:

- Cambridge in America (the University's affiliate alumni office in the U.S.)
- Third-party agencies who provide us with data in the public domain about alumnae and supporters
- Companies who provide College-branded or College-endorsed products and services
- Volunteers closely related to us (e.g. year and local alumnae representatives)

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- Contractors providing services to you on our behalf or services to us (our ‘data processors’), including but not limited to database software providers (currently Blackbaud Inc), telephone fundraising consultants (currently Buffalo Fundraising Consultants) and mailing providers for publications. This list of contractors is updated as required. Use of the data is restricted to purposes defined by the College.

We also facilitate communication between individual alumnae (of the College or the University), but in doing so we do not release personal contact details without prior permission.

Your rights

You have the right: to ask us for access to, rectification or erasure of your data; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your data electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

Where you opt out of all future communications or exercise your right to erasure, we will continue to maintain a core set of personal data (name, subject(s), matriculation and graduation details, unique University identification number and date of birth) to ensure we do not contact you inadvertently in future, while still maintaining our record of your academic achievements. We may also need to retain some financial records about you for statutory purposes (e.g. Gift Aid, anti-fraud and accounting matters).

You retain the right at all times to lodge a complaint about our management of your personal data with the [Information Commissioner’s Office](#).

Data Protection for Student Societies

All Murray Edwards College students are part of Cambridge University Student Union or the Graduate Union. CUSU’s privacy notice and data protection statement can be found here <https://www.cusu.co.uk/data/> and Graduate Union privacy notices are [here](#)

Data protection information for specific student societies at Murray Edwards should be obtained from those groups’ organisers.

Websites

Murray Edwards College Website

How we use your personal information

This statement explains how Murray Edwards College (“we” and “our”) handles and uses information we collect when you visit the College website – www.murrayedwards.cam.ac.uk. Where you engage with the College for another purpose (e.g. as a prospective or current student, as a previous student, as a member of the College or as a visitor to the College), there are other data protection statements to explain our management of your personal information. Where you enter your personal information into an online form for any specified purpose, you will be told about the use we will make of that information (e.g. to send you newsletters or to enable your attendance at an event).

The controller for your personal information is Murray Edwards College, New Hall, Huntingdon Road, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar, Rob Hopwood, bursar@murrayedwards.cam.ac.uk.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. You may ask us to explain our rationale at any time.

We collect and process your personal information for operating and improving our webpages, analysing their use and ensuring the security of our website.

We use a third party service, Google Analytics, to collect standard internet log information and details of your visitor behaviour patterns. We do this to find out, for example, the number of visitors to each page of our website.

We use a plugin called Disqus to facilitate the ability for visitors to comment on our news and blog articles. You can read the Disqus Privacy Policy here: <https://help.disqus.com/terms-and-policies/disqus-privacy-policy>

We have a shop on our website, which requires personal information for the purpose of billing and delivering purchases only. The shop is powered through a Drupal Commerce plugin for iATS.

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There are a number of webforms on our site which require you to provide personal information. This information is used only to fulfil the purpose of the form – for example, to update your details in our alumnae database or to book your place at graduation.

We also collect the request made by your browser to the server hosting the website which includes the IP address, the date and time of connection and the page you ask for. We use this information to ensure the security of our websites and we store it for 7 days. We may use and disclose it as necessary in the event of a security concern or incident.

For information about how we use cookies on our websites, please see <https://www.murrayedwards.cam.ac.uk/privacy-and-cookies>

If you have concerns or queries about any of the above, please contact us at the address given above.

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Last updated: 9th May 2018

Events Website

How we use your personal information

This statement explains how Murray Edwards College ("we" and "our") handles and uses information we collect when you visit the College website(s) – www.murrayedwardsevents.co.uk.

Murray Edwards College is committed to the proper management of personal data.

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Where you engage with the College for another purpose (e.g. as a prospective or current student, as a previous student, as a member of the College or as a visitor to the College), there are other data protection statements to explain our management of your personal information.

Where you enter your personal information into an online form for any specified purpose, you will be told about the use we will make of that information (e.g. to log the enquiry in our database, send newsletters or to enable your attendance at an event).

The controller for your personal information is the Bursar, Murray Edwards College, New Hall, Huntingdon Road, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant legislation in relation to the protection of personal information, is the Bursar, Rob Hopwood, bursar@murrayedwards.cam.ac.uk.

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. You may ask us to explain our rationale at any time.

What information do we collect?

We collect background information about you when you use our website, including your IP address, date and time of connection and the pages you visit. We also employ cookies on our websites. The legal basis for processing your personal information is that it is our legitimate interests to provide and monitor the usefulness of our website and to ensure it is kept secure.

We use a third party service, Google Analytics, to collect standard internet log information and details of your visitor behaviour patterns. We do this to find out, for example, the number of visitors to each page of our website. This data is deleted by Google in accordance with their Data Retention Policy after 26 months. More detail is available www.support.google.com/analytics/answer/7667196?hl=en

We also collect the request made by your browser to the server hosting the website which includes the IP address, the date and time of connection and the page you ask for. We use this information to ensure the security of our websites and we delete it after a maximum of 3 months. We may use and disclose it as necessary in the event of a security concern or

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incident. For more technical details please see <https://help.uis.cam.ac.uk/policies/university-it-facilities-and-services-privacy-notice>.

For information about how we use cookies on our websites, please see www.murrayedwards.co.uk/privacy-and-cookies/

We do not share personal information with third parties. If you have concerns or queries about any of these purposes, or how we communicate with you, please contact us at the address given above.

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office at <https://ico.org.uk/concerns/>

Last updated: 10/05/18 Freya Vaughan, Marketing & Events Officer

The Women's Art Collection

How we use your personal information

This statement explains how Murray Edwards College ("we" and "our") handles and uses information we collect when you visit the The Women's Art Collection website – <https://womensart.murrayedwards.cam.ac.uk/>.

Where you engage with the College for another purpose (e.g. as a prospective or current student, as a previous student, as a member of the College or as a visitor to the College), there are other data protection statements to explain our management of your personal information – please see GDPR section above.

The controller for your personal information is Murray Edwards College, New Hall, Huntingdon Road, CB3 0DF. The person responsible for data protection at the time of issue, and the person who is responsible for monitoring compliance with relevant

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legislation in relation to the protection of personal information, is the Bursar, Rob Hopwood, bursar@murrayedwards.cam.ac.uk

The legal basis for processing your personal data is that it is necessary for the purposes of our legitimate interests, where we have concluded that our interests do not impact inappropriately on your fundamental rights and freedoms. You may ask us to explain our rationale at any time.

What do we use your information for?

We collect and process your personal information for operating and improving our webpages, analysing their use and ensuring the security of our websites. We also collect information to send you news and information about The Women's Art Collection, when you sign up online to our mailing list.

We use Google Analytics to collect standard internet log information and details of your visitor behaviour patterns. We do this to find out, for example, the number of visitors to each page of our website. More information is available at:

<https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage#HowGAUsesCookies>

We also collect the request made by your browser to the server hosting the website which includes the IP address, the date and time of connection and the page you ask for. We use this information to ensure the security of our websites and we store it for 7 days. We may use and disclose it as necessary in the event of a security concern or incident. For more technical details, please see:

<https://help.uis.cam.ac.uk/policies/university-it-facilities-and-services-privacy-notice>.

For information about how we use cookies on our website, please see:

<https://womensart.murrayedwards.cam.ac.uk/data-protection-and-cookie-policy/>.

If you have concerns or queries about any of the above, please contact us at the address given above.

How do we protect your information?

Data retained by the College is kept on secure servers and shared only with staff who are directly involved with the running of The Women's Art Collection. Account data as

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described above is held for a period of seven years from creation and then permanently deleted.

Do we disclose any information to outside parties?

We do not sell, trade, or otherwise transfer to outside parties your personal information. This does not include trusted third parties who assist us as noted above in operating our website, conducting our business, or servicing you, so long as those parties agree to keep this information confidential. We may also release your information when we believe release is appropriate to comply with the law, enforce our site policies, or protect ours or others rights, property, or safety. However, non-personally identifiable visitor information may be provided to other parties for marketing, advertising, or other uses.

We share your email address with Mailchimp when you sign up for The Women's Art Collection newsletter. Their data protection statement can be accessed at:

<https://mailchimp.com/legal/privacy>

In addition, we use Eventbrite as a booking system for Art Collection events. Their data protection statement can be accessed at:

https://www.eventbrite.com/support/articles/en_US/Troubleshooting/eventbrite-privacy-policy?lg=en_US

Your Rights

You have the right: to ask us for access to, rectification or erasure of your information; to restrict processing (pending correction or deletion); to object to communications or direct marketing; and to ask for the transfer of your information electronically to a third party (data portability). Some of these rights are not automatic, and we reserve the right to discuss with you why we might not comply with a request from you to exercise them.

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner's Office at

<https://ico.org.uk/concerns/>

Last updated: May 2018

Sarah Greaves, College Administrator

Photography

If you are commissioning photography or video recordings or taking your own photographs of individuals for use by the College, then you need to have the individual's permission. Photographs and film/video images of people are considered to be personal data and are covered by data protection legislation (General Data Protection Regulation (GDPR)). It is therefore important to keep a written record of consents taken when commissioning images or recordings.

When using images or recordings of people, where any individuals feature prominently and are clearly identifiable, a consent form must be signed by those individuals giving their permission for any images in which they appear. The consent form should be stored alongside the images for as long as the image/recording is retained. The consent form must state clearly what the use of the image(s) will be.

- Adult Consent Form
- Parent/Guardian Consent Form

Individuals should be made aware that any images used on websites can be viewed throughout the world and not just in the United Kingdom and that some overseas countries may not provide the same level of protection to the rights of individuals as UK legislation provides.

Children and young people

Images of children and young people under the age of 18 require the consent of a parent or guardian and special care should be taken to ensure that the consent form is fully understood. Children and young people between 12 and 18 years of age, who have a sufficient understanding of the consent process and its implications for them should be involved in completing the form and their consent should be sought. The child/young person may also sign the form. There is a separate consent form for children and young people under the age of 18.

When is a consent form not necessary?

A consent form is not necessary when there is a large group of individuals e.g. at a conference or an event. It is usually sufficient to notify those in attendance that

photography or filming will be taking place either verbally or with a notice clearly visible, and those who do not wish to be in a photograph or recording can opt out.

A consent form is not necessary where there is a large group of people with no one standing out in a place where photography is expected e.g. spectators at a sporting event. A consent form is not necessary where there is a large group of people who could not be clearly identified.

For further information about data protection in relation to photographs and recordings please contact the [Archivist](#).

Adopted by the College Officers: September 2022

To be reviewed: Michaelmas Term 2025

Prevent Policy

Adopted: January 2025

Review Due: Lent Term 2028

Purpose

Murray Edwards College is required under the Counter-Terrorism and Security Act 2015 to 'have due regard to the need to prevent people from being drawn into terrorism'. Under section 29, it must have regard to guidance issued by the Home Secretary.

Scope

The Prevent Policy applies to all Fellows, staff and students of Murray Edwards College.

Approach

1. The College takes seriously its responsibility to ensure the safety and wellbeing of students, staff, Fellows and the wider community and as part of this would wish to do all that it can to prevent any member of the college community from being drawn into terrorism. It also values the principles of academic freedom and general freedom of expression and has a statutory duty to protect them.

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2. The Senior Tutor has been identified as the member of senior management responsible for ensuring that the College complies appropriately with the Prevent Duty, in liaison with key stakeholders within and beyond the College, including the Prevent Committee. An annual accountability and monitoring return to the Office for Students will be produced, in compliance with the ongoing conditions of the College's registration.
3. As required by the Prevent Duty, the College carries out assessments of the risk of College members being drawn into terrorism. This risk assessment is reviewed at least annually by the Prevent Committee. Where any significant risk is identified, the College will consider what action might mitigate the impact/likelihood of that risk crystallising.
4. The College will ensure that it meets the different legal requirements, not least the duty under the Education (No. 2) Act 1986 to secure freedom of speech within the law. In complying with the Prevent Duty, the College will not provide a platform for any proscribed terrorist organisation or encourage terrorism in any way.
5. The College will carry out training on a biennial basis for all relevant staff so that they can recognise those who are vulnerable of being drawn into terrorism and potential signs of radicalisation. This training will include an explanation of how to handle appropriately and sensitively any concern that may emerge.
6. The College will support vulnerable students in whatever circumstance they find themselves, recognising that radicalisation could occasionally be occurring when certain behaviour is manifest but that other explanations will usually apply. The College seeks to ensure that appropriate provision is made for those of any faith (or those without faith) to access appropriate facilities for pastoral care and for religious purposes.
7. The College considers it unacceptable for its IT networks to be used in any way that supports, promotes or facilitates terrorism. Social media services provide new avenues for the distribution and accessing of extremist material, and the College takes the challenges presented by social media very seriously.
8. The College will not permit material supporting terrorism to be displayed within College premises and will remove any such material if it is found. Likewise, it will seek to ensure that the College's printed and electronic communications (including

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its website) do not contain or support terrorist material or material likely to encourage terrorism and will investigate immediately if any such instances are raised. It is acknowledged that there will be legitimate reasons to display materials relating to terrorism as part of legitimate teaching and research activities.

Roles and Responsibilities

1. The Council is responsible for approving the Prevent Policy and for approving the College's annual accountability and monitoring return to the Office for Students in compliance with the ongoing conditions of the College's registration.
2. The Prevent Committee will review the policies, risk assessments and resulting action plans relating to the College's duties under the Counter-Terrorism and Security Act. They will compile College's annual accountability and monitoring return to the Office for Students in compliance with the ongoing conditions of the College's registration.
3. All Fellows, staff and students should be aware of the College's responsibilities under the Prevent Duty and of the measures set out above to comply with it. Members of the college community who are concerned about a student who might be at risk of being drawn into terrorism should report this to their line manager or the Senior Tutor. Concerns about Fellows or staff who might be at risk of being drawn into terrorism should be reported to the Senior Tutor.

Related Policies

Freedom of Speech - see above

Management of External Events and External Speakers - see above

Code of Practice regarding Elections and Party Political Activity - see above

Computer Regulations

Safeguarding Policy

Adopted by Council: Easter Term 2023

Review Date: Easter Term 2026

Committee Ownership: Council

[Safeguarding Concern Form](#)

1. Aims

a. The College aims to adopt the highest standards and take all reasonable steps in relation to the safety and welfare of children, young people and adults at risk. From time to time, the College encounters children, young people and adults at risk through its teaching and research activities. However, the majority of engagement will be through recruitment and outreach programmes.

b. We recognise that anyone can be subject to discrimination, harassment and victimisation because of age, culture, disability, sexual orientation, gender reassignment, married or civil partnerships, and religion or belief. Comments and actions that contribute to discrimination, harassment or victimisation are not acceptable and will be challenged.

c. This policy aims to support these activities and to offer assurances to those engaged in the work of the College that, through its implementation, the College seeks to protect children, young people and adults at risk and keep them safe from harm when in contact with the College's employees, Fellows, volunteers, students or other representatives (whether acting in a paid or unpaid capacity) as listed below under Scope. It is also intended to safeguard the interests of employees, Fellows, volunteers, students and anyone who works on behalf of the College and who comes into contact with children, young people or adults at risk.

d. This policy seeks to:

i. promote and prioritise the safety and wellbeing of everyone, particularly children, young people and adults who may be at risk;

ii. ensure that roles and responsibilities are made clear in respect of safeguarding matters and that an appropriate level of information, training and support is provided to those within the College for whom it is necessary;

iii. offer assurances to staff, students, parents, carers, volunteers and visitors that safeguarding concerns will be dealt with effectively and in a timely manner;

iv. follow safer recruitment processes to prevent the employment or ongoing employment of individuals to work with children, young people or adults at risk where they have been barred by the Disclosure and Barring Service (DBS) or are deemed by the College to pose an unacceptable risk;

v. manage effectively the risks associated with activities and events involving children, young people and adults at risk.

2. Scope

- a. The College's Fellows, employees, workers, volunteers, students, alumnae or anyone working on behalf of the College (in a paid or unpaid capacity) are subject to this policy. This includes external speakers at student events.
- b. The policy covers all events and activities organized by those working on behalf of or representing the College, as well as official events and activities organized by its students. Such activities include open days, applicant visits and interviews, the interactions between students and the College nurse or counsellor and visits from members of the public.
- c. It is expected that external bodies utilising the College's premises or facilities for external events will have their own safeguarding policies and procedures in place and will take full responsibility for the safeguarding of individuals involved in any related activities. When working with young people on roll with schools, Access & Student Recruitment will refer any concerns directly to that school's Designated Safeguarding Lead.

3. Definitions

- a. Safeguarding (1): arrangements in place to protect children, young people and adults at risk in vulnerable circumstances from abuse or neglect.
- b. Child/Children: anyone under the age of 18.
- c. Adult at Risk: to any person aged 18 years and over who has needs for care and support and, is experiencing, or is at risk of, abuse and neglect and, as a result of those care needs is unable to protect themselves from either the risk of, or the experience of, abuse or neglect.
- d. Abuse: physical, sexual, psychological/emotional, financial/material or professional abuse which can also arise from neglect, including those found in Annex A.
- e. Murray Edwards College has assessed and analysed eligibility of all job roles via the DBS tool at www.gov.uk/find-out-dbs-check. Regulated activity in relation to adults at risk (2): activities provided to any adult which, if any adult requires them, will mean that the adult will be considered at risk at that particular time. Any time a person engages in one or more of the activities set out below in relation to any adult, they are deemed to be engaging in regulated activity and that adult is deemed to be at risk at that time (3):
 - i. Providing health care (whether physical or mental, including palliative) provision by any health care professional who is regulated by General Medical Council, General Dental Council, Nursing and Midwifery Council, Health Professions Council.

College Policies and Procedures

- ii. Providing psychotherapy and counselling which is related to health care the adult is receiving from, or under the direction or supervision of a health care professional.
- iii. Providing first aid, when any person administering it is doing so on behalf of an organization established for the purpose of providing first aid (e.g. Red Cross).
- iv. Providing personal care as a result of physical or mental illness, including physical assistance with eating or drinking, going to the toilet, washing, bathing, dressing etc., or supervising, training or providing advice/guidance to an adult to undertake these activities themselves where they cannot make the decision to do so unprompted.
- v. Providing social work.
- vi. Assisting with general household matters (e.g. managing a person's money, paying their bills, shopping on their behalf).
- vii. Assisting in the conduct of a person's affairs (e.g. undertaking lasting or enduring power of attorney for an adult under the Mental Capacity Act 2005, being an independent mental health advocate etc.).
- viii. Conveying (e.g. driving a person specifically for the purpose of conveying them to and from places to receive care as detailed above).

4. Roles

- a. The College Council has overall ownership of this Policy, and may nominate one (or more) of its members to oversee and scrutinise safeguarding arrangements. It is the duty of the Trustees to report notifiable incidents to the Charity Commission.
- b. The Senior Tutor is the College's designated Safeguarding Officer, with the Bursar and Deputy Senior Tutor acting as deputies. As such, he/she takes responsibility for the implementation of the policy and will promote the importance of safeguarding within the College. The responsibilities of the Safeguarding Officer are outlined in [Annex C](#). The Safeguarding Officer may delegate responsibilities as appropriate. Given the complexity of safeguarding matters, it is essential that any concerns are reported to the Safeguarding Officer to ensure that one person has access to all the relevant information. This is particularly important where a number of seemingly minor issues may collectively give rise to a more substantial concern.
- c. In the event that a complaint or accusation is made about the Safeguarding Officer, this will be considered independently by the appropriate deputy (or another council member). The event may be referred to social services or the police, if appropriate.
- d. Each Head of Department is accountable for the adoption and implementation of this policy and for promoting safeguarding within their Department. Every member of the College must abide by this policy.

5. Planning Activities

- a. The College Council delegates responsibility to the Head of Department to retain oversight and documentation of regulated activities within their area and to ensure:
 - i. appropriate training and supervision is available to those employees, workers, Fellows, volunteers or students engaging in them;
 - ii. occasions in which those engaged in them will need to work alone in an unsupervised way are documented and minimised; and
 - iii. that they are appropriately risk assessed; and
 - iv. that children and adults engaged in regulated activities are given clear information about how, and to whom, they can report any safeguarding concerns.

6. Safeguarding Risk Assessment

- a. The College Council delegates responsibility to the Head of Department to ensure:
 - i. that a safeguarding risk assessment is undertaken for all activities within their area (the assessment should consider how the risks identified can be minimised or eliminated, outline the local processes for reporting concerns, take account of health and safety considerations and record training requirements);
 - ii. that completed safeguarding risk assessments are made available to employees, Fellows, workers, volunteers or students who are involved in the activity; and
 - iii. that the implementation and review of actions identified within a safeguarding risk assessment is undertaken in a timely manner.
 - iv. A template safeguarding risk assessment can be found in [Annex D](#).

7. Induction and Training

- a. The College Council delegates responsibility to the Head of Department to:
 - i. Ensure that any employee, worker, Fellow, volunteer, student or any other representative as outlined in the Scope, who is working on behalf of the College within their area:
 - a. is made aware of the existence of this policy and asked to familiarize themselves with the contents as part of their induction.
 - b. completes safeguarding training, together with any additional training that may have been identified by any relevant risk assessment processes Prior to engaging in a regulated activity.

ii. Monitor the safeguarding training undertaken by those working on behalf of the College in their area and provide details to Human Resources for recording.

A list of those roles which require training is available from Human Resources.

8. Recruitment and Disclosure and Debarring Service (DBS) checks

a. It is the responsibility of the Head of Human Resources to determine with the Safeguarding Officer what level of DBS check may be required for a role which is to be recruited to.

b. Appropriate DBS checks will be undertaken as appropriate via the HR department when recruiting to the roles in the following departments: Porters' Lodge, Tutorial Office, Wellbeing, Admissions, Access & Student Recruitment and any other relevant role that the College Council sees appropriate and as deemed appropriate under legislation. The College will undertake additional pre-employment checks where necessary as part of its safeguarding duty, including checking the accreditation of anyone employed by the College as a healthcare or psychotherapy professional such as a Counsellor or Nurse. References from recent previous employers will also be sought.

c. The Safeguarding Officer may refer someone to the DBS as per the [guidance](#).

9. Arrangements for supporting students under the age of 18

a. The College is not able to take on the authority, rights and responsibilities of parents in relation to their children, and it will not act in loco parentis in relation to students who are under the age of 18 years. However, when admitting a student who will be significantly under the age of 18 when coming in to residence, the College will consider a wide range of issues, including social interaction, provision of tutorial support and supervision as follows.

i. Tutorial support and teaching – the format of tutorial and teaching support when under-18s are involved will seek, insofar as their educational experience would not be compromised, to avoid singleton tutorials or supervisions. It is recognized, however, that one-to-one contact with Tutors, Directors of Studies and Supervisors at meetings may be necessary.

ii. IT – Use of the internet by under-18s for study will be as for all students.

iii. Alcohol and student arranged activities – Access to alcohol by undergraduates under the age of 18 at any activity which is signed off by or known to the College will not be permitted. It is acknowledged that the individual student must also bear responsibility for his or her actions at any event. Safeguarding issues will be covered at the sign-off stage with student organisers. Consideration should be given to any risk posed by students over

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18 at these events.

iv. The College Bar – the College has effective systems and practices to counter underage drinking and no student under 18 is permitted to work in the College bar.

v. Liaison with Faculties and Departments – the College will inform/consult with the relevant Faculty or Department as early as possible about any student who will be under the age of 18 who is being admitted so that the University can put appropriate measures in place to meet its safeguarding obligations.

vi. Residential accommodation offered by the College is generally intended for the use of adults and, except in exceptional circumstances, special arrangements are not made for students who are under the age of 18 years.

vii. It will be necessary to investigate whether the Home Office will issue a visa to an overseas student who is significantly under the age of 18.

b. [Annex E](#) records the arrangements for any academic events sponsored by the College for persons less than 18 years of age.

c. [Annex F](#) records the arrangements for events sponsored by external parties and hosted by the College for persons less than 18 years of age.

10. Raising a concern or allegation of abuse

a. Any person involved in the work of the College (Fellows, employees, workers, volunteers, students or anyone working on behalf of the College in a paid or unpaid capacity) can raise a concern or allegation of abuse directly with the Safeguarding Officer or a deputy. If a concern or allegation is against the Safeguarding Officer, it should be reported the President or the Vice-President.

b. The Safeguarding Officer or the deputy will complete a Safeguarding Concern Form (available from the HR Manager).

c. If a concern or allegation is against the Safeguarding Officer, the President or Vice-President will lead the procedure.

11. Procedure for dealing with suspicions or allegations of abuse

a. Those working with children and engaged in regulated activities may:

- have alleged abuse disclosed to them;
- be concerned about events they have heard or seen;
- or be accused of abusing those in their charge.

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Whilst these issues may require very different courses of action, it is essential that the safety and welfare of the child or adult at risk is prioritised.

- b. The Safeguarding Officer has responsibility for ensuring that they (or a nominated deputy) are available during normal working hours to respond to allegations without delay, and for procedures to be in place should issue arise outside of normal working hours.
- c. In the event there is a risk of immediate serious harm to a child or adult at risk, the emergency services should be contacted via 999 without delay. Anybody can make a referral in these circumstances. The Safeguarding Officer should then be notified of the case.
- d. Where a child or adult at risk discloses alleged abuse, or a member of the College suspects abuse which is not deemed to be an emergency, this should be referred immediately to the Safeguarding Officer who will consider what action is required. A referral should be made even where concerns are seemingly minor; in some instances it is a pattern or range of minor incidents which, when taken together, amount to a more significant concern requiring investigation. It is therefore vital that the Safeguarding Officer is privy to all concerns as they arise.
- e. Appropriate records will be retained by the Safeguarding Officer in accordance with the College's Data Protection Policy. Where the matter relates to both staff and students, the Safeguarding Officer will determine where the file should be kept.
- f. In consultation with the President and HR Manager the Safeguarding Officer will be responsible for contacting any statutory agencies if necessary. The Safeguarding Officer will also have responsibility for fulfilling any legal obligations to report an individual to the DBS.
- g. The College is not expected and should not attempt to investigate suspicions of abuse independently.
- h. Where a suspicion needs to be investigated by the relevant authority, it may be necessary for the College to do one or more of the following, as advised by social services or the police:
 - i. move the victim of an alleged safeguarding breach to a safe place;
 - ii. suspend the individual(s) about whom an allegation or suspicion has arisen;
 - iii. prevent the individual(s) about whom an allegation or suspicion has arisen from engaging in any regulated activities.

- i. Serious safeguarding breaches may constitute gross misconduct under the College's disciplinary policy and may lead to summary dismissal.
- j. If a concern or allegation is against the Safeguarding Officer, the President or Vice-President will lead the procedure.

12. Relevant College policies

This policy should be read in conjunction with the College's policies, in particular:

- Appropriate Relationships between Fellows, Bye-Fellows, Staff, Postgraduates engaged in teaching and Students
- Harassment and Sexual Misconduct
- Student Complaints Procedure
- General Data Protection Regulations
- Alcohol Misuse
- Drugs Misuse
- Equal Opportunities
- Health and Safety
- Freedom of Speech
- Prevent
- Online Safeguarding

(1) See [Care Act 2014](#)

(2) [Full definitions of regulated activity in relation to adults](#)

(3) *The roles of the College's nurse or counsellor are considered to involve engaging in regulated activity with adults. The roles of the College's academic Senior Tutor, Tutors, Directors of Studies and Supervisors are not considered to involve engaging in regulated activity with adults as defined by the relevant legislation.*

Annex A: Definitions of Abuse

The following are examples of abuse; this list is not exclusive.

Abuse

A form of maltreatment of a child or adult at risk. Somebody may abuse or neglect a child or adult at risk by inflicting harm, or by failing to act to prevent harm. Children or adults at

risk may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children or adults at risk may be abused by an adult or adults, or another child or children.

Physical Abuse

A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child or adult at risk. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child or an adult at risk.

Emotional Abuse/Psychological Abuse

The persistent emotional maltreatment of a child or adult at risk such as to cause severe and persistent adverse effects on the individual's emotional development. It may involve conveying to the individual that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the individual opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

Sexual Abuse

Involves forcing or enticing a child or adult at risk to take part in sexual activities, not necessarily involving a high level of violence, whether or not the individual is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children or adults at risk, in looking at, or in the production of, sexual images, watching sexual activities, encouraging them to behave in sexually inappropriate ways, or grooming an individual in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect

The persistent failure to meet a child or adult at risk's basic physical and/or psychological needs, likely to result in the serious impairment of their health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- protect a child or adult at risk from physical and emotional harm or danger
- ensure adequate supervision (including the use of inadequate care-givers)
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child or adult at risk's basic emotional needs.

Self-Neglect

This covers a wide range of behaviours such as neglecting to care for one's personal hygiene, health or surroundings and includes behaviour such as hoarding.

Financial or material abuse

This can include theft, fraud, internet scamming and the misuse or misappropriation of property, possessions or benefits. It also includes coercion in relation to an adult's financial affairs or arrangements, including wills, property, inheritance or financial transactions.

Domestic Abuse

Domestic abuse is categorised by any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass physical, emotional, psychological, sexual and financial abuse.

Modern Slavery

Modern Slavery can take many forms including the trafficking of people, forced labour, servitude and slavery. Children (those aged under 18) are considered victims of trafficking, whether or not they have been coerced, deceived or paid to secure their compliance. They need only have been recruited, transported, received or harboured for the purpose of exploitation.

Discriminatory Abuse

Discriminatory and oppressive attitudes towards people on the grounds of disability, gender and gender identity and reassignment, age, race, religion or belief, sexual orientation, and political beliefs.

It may be a feature of any form of abuse and manifests itself as physical abuse/assault, sexual abuse/assault, financial abuse/theft, neglect and psychological abuse/harassment. It includes verbal abuse and racist, sexist, homophobic or ageist comments, or jokes or any other form of harassment. It also includes not responding to dietary needs and not providing appropriate spiritual support.

Prevent

The Prevent duty was introduced under the Counter Terrorism and Security Act (2015) so that education providers, including universities to have regard to the need to prevent people from being drawn into terrorism or extremism. This is sometimes referred to as being at risk of radicalisation.

For further information see:

- [Cambridgeshire and Peterborough Safeguarding Children Partnership Board \(CPSCPB\)](#)
- [Cambridgeshire and Peterborough Safeguarding Adults Board](#)

Annex B: Guidance for those acting on behalf of the College carrying out activities involving children or adults at risk

This guidance should be read in conjunction with the College's Safeguarding Policy.

General considerations

If you are acting in a position of trust with children or adults at risk, you are expected to be mindful that you are acting as a role model and therefore should behave accordingly. Care should be taken to ensure that your conduct is appropriate to each circumstance and environment as well-intentioned actions can be misinterpreted.

All regulated activities should have undergone a risk assessment process, and you should have a copy of the relevant risk assessment which will identify the person to whom any concerns should be addressed promptly.

In your role you may become aware of, or suspect another person of abusing a child or adult at risk or they may disclose an allegation of abuse to you. You should raise any concerns with the Safeguarding Officer.

Allegations of inappropriate behaviour may also be made against you, and such allegations will need to be investigated, and may result in referral to external agencies.

Safeguarding of children, young people and adults at risk

You should:

- Treat everyone within the College community with respect
- Provide an example of good conduct which others can follow;
- Ensure you have completed any required training and that you know what you should do if a child or adult at risk makes a disclosure to you;
- Ensure you are familiar with any relevant risk assessment(s) and understand who the key contact is for the activity you are engaged in;
- Give due regard to cultural difference;
- Be alert to and tackle inappropriate behaviour in others, including peer-to-peer behaviours. Abusive behaviour such as bullying (including cyber-bullying), ridiculing or aggression should not go unchallenged;
- If you have to give feedback, take care that it is not unnecessarily negative;

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- Avoid being in a situation where you are alone with a child and make sure that others can clearly observe you;
- Take care that your language is not open to sexual connotation;
- Report any suspicions promptly and confidentially to the Safeguarding Officer;
- Deal with information sensitively and be aware that special caution may be required in moments when discussing sensitive issues with children, young people and adults at risk.

You should not:

- Engage in, or allow, any form of unnecessary physical contact. This would include doing personal things for a child or an adult at risk that they can do for themselves. Where the person is disabled, tasks should only be carried out with the full consent of the individual, (or their parent);
- Use inappropriate language, or allow others to use it without challenging it;
- Allow yourself to be drawn into inappropriate attention-seeking behaviour;
- Show favouritism to any individual;
- Rely on the College's good name to protect you;
- Engage in any physical sexual relationship with a person to whom you are in a position of trust, even if they give their consent;
- Give your personal contact details (such as personal phone number, home address, email, Skype address or other communication routes) to a child or adult at risk, or use any unofficial route to communicate with a child or adult at risk;
- Interact in a personal capacity with children or adults at risk outside of the regulated activity, including through any form of social media, for example, by becoming 'friends' on Facebook;
- Allow allegations of inappropriate behaviour to go unchallenged, recorded or acted on;
- Allow personal preconceptions about people to prevent appropriate action being taken;
- Accept gifts which could in anyway be considered a bribe or inducement to enter into a relationship or give rise to an allegation of improper conduct against you;

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- Take photographs, or make other recordings of at children or adults at risk without specific written consent of the individual, or someone with parental responsibility for that individual.

You should seek advice from the Safeguarding Lead if:

- You suspect a relationship is developing which may be an abuse of trust;
- You are worried that a child or adult at risk is becoming attracted to you or a colleague;
- You think a child or adult at risk has misinterpreted something you have done or said;
- You have had to physically restrain a child or adult at risk to prevent them from harming themselves, another person or causing significant damage to property;
- A child or adult at risk tells you that they are being abused, or describes experiences that you consider may be abuse;
- You see suspicious or unexplained marks on a child or adult at risk or witness behaviours which are unusual or inappropriate.

If an concern or allegation is against the Safeguarding Officer, concerns should be reported to an appropriate deputy.

Dealing with disclosures of allegations, or suspicions, of inappropriate behaviour

- Consider the urgency of the situation: in the event there is a risk of immediate serious harm to a child or adult at risk, the emergency services should be contacted via 999. Anybody can make a referral in these circumstances. The relevant Safeguarding Officer should then be notified of the case and will need to determine whether to refer serious cases to the relevant authorities within one working day;
- Remain calm, avoid expressions of anger or upset and ensure that the person knows you are taking them seriously. Reassure them that they are right to have told someone, but do not touch them (for example by putting an arm round them);
- DO NOT try to investigate or act on the matter yourself: doing so may seriously compromise an investigation by the relevant authorities. You need only clarify what is being said to you (in order to establish that there is a suspicion of harm), and then refer the matter to the appropriate individual as set out in the policy;

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- Be supportive but DO NOT promise confidentiality. A duty of care obligates the College to act on information where a safeguarding issue has been identified and this takes precedence over the need for confidentiality. Explain that, in order that the allegation can be addressed you will have to talk to other people about it. Explain who you will talk to;
- Avoid 'leading' questions, or expressing a view about what you have been told;
- Use clear language, appropriate to the person you are dealing with;
- Do not talk to anyone else about the matter within your Department, or your family and friends; if you need to seek support for yourself you should speak to the Safeguarding Officer;
- Complete the College's Safeguarding Concern Form as soon as possible. In all events this must be done on the same day but this should not delay prompt action. Write down exactly what was said in the person's own words as far as possible, include the time, place, and as much detail as you can remember, but ensure that the note is as factual as possible and avoid assumption, speculation or opinion. Bear in mind that the note will be disclosable to both internal and external agencies.
- Observe confidentiality with colleagues, students, friends and family.

Annex C: Role of Safeguarding Officer

This guidance should be read in conjunction with the College's Safeguarding Policy.

The role of the Safeguarding Officer is as follows:

1. To promote a safe environment for the children , young people and adults at risk within the organisation, including overseeing safer recruitment.
2. To raise awareness by:
 - a. Reviewing on a regular basis the activities of the College involving children or adults at risk;
 - b. acting as a senior strategic figurehead for safeguarding issues at the College;
 - c. ensuring that the Safeguarding Policy is implemented, and promulgated;
 - d. ensuring regular review of the Safeguarding Policy, at least annually, including making recommendations for the amendment of the Policy in line with changes to legislation, when required.
3. To manage referrals by:
 - a. ensuring the person with the concern completes a Safeguarding Concern Form within 24 hours;
 - b. keep a record of all agencies and/or professionals the matter is referred to, including when and what the actions/outcomes are;
 - c. keepi an accurate record of any incidents or matters that raise issues concerning the protection of children, young people or adults at risk, in line with the College's policy on data protection and retention;
 - d. advising and taking appropriate action in the event that allegations of abuse are made in the contexts set out in the policy;
 - e. contacting agencies immediately for advice if not making a referral. If agency investigations are required for allegations against position of trust and/or complaints, the LADO (Local Authority Designated Officer) or adult social care services will take the lead and advise what needs to be done and by whom, along with the police.
 - f. ensuring that those involved in any case are appropriately supported.
4. To undertake and promote appropriate training by:
 - a. engaging in training to ensure that knowledge is kept up to date;
 - b. ensuring that appropriate information and training are available to members of the College who in the nature of their role will come into contact with adults at risk and children.
5. The Safeguarding Officer will be responsible for identifying roles within the College for which a DBS check is required, and recommending these to Council for approval

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6. The Safeguarding Officer will report annually to the College Council / Governing Body on matters concerning the protection of children, young people and adults at risk and on the operation of the College's Safeguarding Policy.

Annex D: Safeguarding Risk Assessment Form

Form

Annex E: Arrangements for events sponsored by the college for persons less than 18 years of age

This guidance should be read in conjunction with the College's Safeguarding Policy.

General

The College does not organise residential events for children expected to be under 16. Children under 16 would only be accepted if a parent attends with them. The College requires students aged 11 to 16 attending daytime events to be accompanied by staff who are responsible for their students at all times.

Where externally organised groups of children and young people are attending College, it is the responsibility of the sending organisation to ensure they supervise their group adequately throughout their time at College. College staff managing the activity should ask the sending organisation for confirmation of the arrangements and contact information in advance of the activity taking place.

Where children and young people attend the College in an individual capacity, it is the responsibility of Access and Student Recruitment to provide adequate supervision throughout the time the participants are at College. College staff managing the event must ensure that contact details for participants, as well as contacts for parents or carer, have been received.

Residential activities (i.e. those where participants stay one or more nights in College) managed by Access and Student Recruitment will follow the supervision requirements set out in the College's Safeguarding Policy. Such activities constitute Regulated Activity as defined in the Safeguarding Vulnerable Groups Act 2006 (SVGA), amended by the Protection of Freedoms Act 2012 (PoFA). Any adult that undertakes such responsibility must have the required DBS check in place, as well as receive adequate training from the sending organisation (if supervising their own group), or from College (if supervising participants attending in an individual capacity).

In all scenarios, the College Porters will be available in College to support Access and Student Recruitment staff.

Supervision

The College requires adult to children supervision levels as follows ([adult-to-child ratio as recommended by NSPCC](#)):

9-12	1:8
13 -18	1:10

There will be a minimum of two adults at all times.

Term time events

Under 18s invited to residential term-time events (in practice, the Offer Holders' Overnight Stay) will be given shared rooms for overnight accommodation. There will generally be two under 18s and one current student over the age of 18.

When under-18s are present during evening events, current students are not permitted to consume alcohol at formal hall which under 18s are also attending. Only non-alcoholic drinks should be consumed in the bar when it is planned that under 18s are present.

The following wording is used to obtain parental consent for all attendees of residential term-time college events:

I am aware that my daughter/charge will be sharing a room overnight with a girl of a similar age and a current Murray Edwards College student and that she will be taking part in activities organised by the college as well as more informal activities, within and outside College premises, with other students, where she chooses to do so.

Should an offer holder below the age of 17 wish to attend any such overnight event, there will be liaison with the school/family of the individual and any special arrangements made accordingly.

Murray Edwards students hosting offer holders will be briefed appropriately by the Schools Liaison Officer, Senior Recruitment and Outreach Officer or Admissions Tutor (as appropriate).

Events held in college during vacations

Under 18s are accommodated in single, en suite rooms with corridors separated by gender as far as possible. Lights out checks are conducted at 11pm. Attendees are only allowed to leave College at specified times, if at all.

Procedures for protection of and by College Staff

College staff will be provided with training on appropriate behaviour for protection of themselves and protection of children and vulnerable adults, in particular, Porters, Maintenance and Housekeeping. All Porters and Admissions staff are DBS checked.

Recognising that details of children and young people attending events are subject to change, as far as practicable Access and Student Recruitment will provide the Porters with information of activities taking place in College at least one week in advance.

Annex F: Arrangements for events hosted by the college but sponsored by external parties involving persons less than 18 years of age or adults at risk

This guidance should be read in conjunction with the College's Safeguarding Policy.

Under the College's standard terms and conditions for events organised by external parties, principal responsibility for the safety and welfare of young and adults at risk remains with external party but the college aims to support and promote that safety and welfare.

Due Diligence

Before acceptance of summer schools or events with prisons, hospitals or other regulated institutions, the college will seek evidence that external organisers have addressed their safeguarding responsibilities adequately. This may extend to obtaining copies of their own policies and procedures.

Supervision

The college requires adult to children supervision levels as follows ([adult to child ration recommended by NSPCC](#)):

11-12	1:8
13 -18	1:10

In no circumstances does the college accept groups of children aged less than 11 years. Where a client has mixed age group students the supervision level should be appropriate to the number of students in each age range and rounded up. There will be a minimum of two adults at all times.

Segregation

The College separates accommodation by gender with an appropriate level of same sex supervision available as far as possible unless otherwise reasonably directed by the client. The College endeavours to house students on floors or staircases which are private to individual client groups where numbers and the building configuration permit. Where this is not entirely achievable we use supervisors' accommodation and the building features to provide notional and physical separation.

In relevant areas the College will keep otherwise available rooms unoccupied to achieve segregation where necessary at no additional charge to the client.

Procedures for protection of and by College staff

Maintenance requests and the servicing of rooms will be carried out between 8.30am-11.30am Monday to Friday and the client is required to ensure that young persons or adults at risk are either temporarily vacated from the relevant room or that college staff are appropriately supervised. College staff will be provided with training on appropriate behaviour for protection of themselves and protection of children, young people and adults at risk, in particular, Porters, Maintenance and Housekeeping. All Porters and Admissions staff are DBS checked.