Senior Tutor Services

(Senior Tutor's Office, Tutorial Service and Postgraduate Advisory Service)

Financial Assistance Privacy Statement

Introduction

This is a statement of the practices of the Senior Tutor Services, Trinity College Dublin, The University of Dublin (the "University") of College Green, Dublin 2, Ireland in connection with the capture and use of personal data of applicants for student Financial Assistance by the Senior Tutor's Office, the (undergraduate) Tutorial System and the Postgraduate Advisory Service, and the steps taken by the University to respect your privacy.

The University fully respects your right to privacy and actively seeks to preserve the privacy rights of those who share information with the University. Any personal information which you volunteer to the University will be treated with the highest standards of security and confidentiality, in accordance with Irish and European Data Protection legislation. From 25 May 2018, we shall process your personal data in accordance with the General Data Protection Regulation (EU) 2016/679.

The privacy notice explains the following:

- Why we collect your personal data
- What data we collect
- How we collect and use your personal data
- The purpose and legal basis for collecting your personal data
- How we ensure your consent to gathering, storing and sharing your personal data
- How we store and secure personal data
- Details of third parties with whom we share personal data
- What your rights are
- How you can raise queries and complaints

Why we collect your personal data

Personal data of Financial Assistance applicants is collected for two purposes:

- 1. To assess whether a student satisfies the requirements for financial assistance, namely meeting the allocation criteria for the Student Assistance/Hardship Funds (undergraduate or postgraduate, as appropriate), Sports Waivers and/or Benefactions.
- 2. For University reporting and auditing requirements, namely that as a condition of Trinity continuing to receive the funding to support financial assistance, the awarding authorities who allocate funds to the University for distribution require certain information on how the funds were distributed, how they were spent and the impact the funds may have had.

What data do we collect?

Data Type	Required for Student Assistance/ Hardship Funds?	Required for Benefactions?	Required for Sports Waivers?
Registration Status	Yes	Yes	Yes
Student Name	Yes	Yes	Yes
Student ID Number	Yes	Yes	Yes
Gender Identity	Yes		
TCD Email address	Yes	Yes	Yes
Date of Birth	Yes	Yes	Yes
Course of study	Yes	Yes	Yes
Current year of course	Yes	Yes	Yes
College Entry route (CAO, etc)	Yes		
Previous educational attainment	Yes		
Ethnic/ Cultural background	Yes		
Free status (EU/ Non- EU)	Yes		
Area of origin (EU/ EEA, etc.)	Yes		
Residency status	Yes		
Previous receipt of SAF	Yes		
SUSI status	Yes		
Other bursaries/ scholarships	Yes		
Age (if over 54 or under 25 on 1 st September of current academic year)	Yes		
Employment status	Yes		Yes
Household income	Yes		Yes
No. of Dependents/	Yes		Yes
Family status			
Living arrangements	Yes		Yes
Disability Service Registration Status	Yes		
Membership of Clubs		Yes* for applications to Minchin and Taverners Cricket Sports Bursary only	

How we collect and use your personal data

The personal data we collect from you will be used only by the University for lawful purposes outlined in this privacy notice.

Personal data will be collected in the following ways:

Electronic format – when students apply online to the Student Assistance/Hardship Funds, (undergraduate or postgraduate, as appropriate) they are required to share information relating to their personal circumstances, including previous educational attainment, employment status and financial information.

Students applying to the Student Assistance Funds are also required to provide information on the financial circumstances of their household (parents/ guardians in the case of dependant students and/or partners in the case of married couples, civil partners or cohabiting partners

Email— Students applying to the Student Assistance/Hardship Funds also be required to submit documentary evidence of their/ their household's circumstances directly to the relevant student support officer via email to <u>ug_hardship@tcd.ie</u> (for undergraduates) and <u>pgsupp@tcd.ie</u> (for postgraduates) *)*. These can also take the form of document attachments which will be treated in a similar way to the contents of an email.

Students applying for a waiver of the Sports Centre Charge will be required to submit an application form and documentary evidence of their/ their household's circumstances directly to the relevant student support officer via email.

Students applying for additional Benefactions (i.e. individual Bursaries, Exhibitions and Awards) will be required to submit an application form and documentary evidence of their/ their household's circumstances directly to the relevant student support officer via email.

How we share your personal data

Personal data will be disclosed only to funding authorities or awarding committees, as appropriate, and only when it is necessary for them to review an application for financial assistance or as a reporting and audit requirement of the University in order to continue to receive funding for the awards.

Data of applicants who receive financial assistance allocated from the European Social Funds Student Assistance Fund with be shared with the ESF Managing Authority, as required. When we share your personal data with the third parties outlined above, the University will ensure that the data is only processed according to our specific instructions and that the same standards of confidentiality and security are maintained. Once the processing of personal data is complete any third parties with whom data was shared will be required to return the data to the University, save where they are required to retain it by law.

Data contained in the applications will be shared with the following funders/awarding committees for the following purposes only:

Funder/ Awarding Committee	Data sharing purpose	
DES European Social Fund (ESF) Managing	To satisfy statistical and outcome reporting	
Authority (awardees of the ESF Student	requirements of the funding authority, for	
Assistance Fund only)	auditing purposes, and in order to release	

	funding to the University annually
Trinity Disability Service (awardees of the ESF Student Assistance Fund only)	To satisfy statistical and outcome reporting requirements of the funding authority, for auditing purposes, and in order to release funding to the University annually
Trinity Access Programmes (awardees of the ESF Student Assistance Fund only)	To satisfy statistical and outcome reporting requirements of the funding authority, for auditing purposes, and in order to release funding to the University annually
Financial Assistance Committee [membership of which is published in the College Calendar]	To assess undergraduate student applications to the Student Assistance/Hardship Funds, undergraduate Sports Centre Charge Waivers and benefactions whose allocations fall to the responsibility of the Financial Assistance Committee ¹ and approve allocation of assistance.
Postgraduate Financial Assistance Committee [membership of which is published in the College Calendar]	To assess postgraduate applications to the Postgraduate Student Assistance/Hardship Funds and postgraduate Sports Centre Charge Waivers and approve allocation of assistance.
Frederick Purser Trustees Committee [membership of which is published in the College Calendar]	To assess applications to the Frederick Purser Undergraduates and Graduates' Funds only and approve allocation of assistance.
Minchin Bursary Committee [membership of which is published in the College Calendar]	To assess applications to the Minchin Bursary only and approve allocation of assistance.
Taverners' Cricket Sports Bursary Committee [membership of which is published in the College Calendar]	To assess applications to the Taverners' Cricket Sports Bursary only and approve allocation of assistance.
Head of French	To jointly-assess applications to the Owen Sheehy Skeffington Memorial Awards only and on the Head of French's nomination
School of Law	To jointly-assess applications to the Law Students' Quatercentenary Fund only and approve allocation of assistance

¹ Details of which are contained in the *University Calendar, Part II, Financial Assistance* section, and include, *inter alia*, the William and Mary Atkins Memorial Fund, Boston Fund, 1963 Bursary Fund, John F. Chambers – Lennox Bursary, Ellen Cotter Fund, Crowe Exhibitions, Culverwell Fund, Downes Exhibition, Field Exhibition, Lucy Gwynn Fund, Benjamin Hudson Fund, Mackay Wilson Fund, Jean Montgomery Fund, Salmon Fund, Span Exhibitions, Stanley Fund, Stearne Exhibitions, Student Parent Group – Jackie Akerele Fund, Students' Union Placement Bursary, Worrell Exhibitions.

The names and student ID numbers only of successful applicants will be shared to the following areas in the University on the following basis and for the outlined purpose only:

University Area	Data sharing purpose
Academic Registry - Student Fees and Payments team (for all awardees)	To process student payment requests and sports waivers via my.tcd.ie student portal
Financial Services Division (for awardees of benefactions only)	To process allocation requests from the benefaction accounts
Trinity College Accommodation and Catering Department (for awardees of the Jean Montgomery Fund only)	To process allocation of Commons/ meals served in College catering outlets.

The student ID numbers of successful applicants to benefactions (including both those whose allocations fall to the responsibility of the Financial Assistance Committee² and other benefactions which have their own awarding committees) will be notified to the College Board for noting and approval annually.

The purpose and legal basis for collecting personal data

Purpose:

The personal data we collect will be used to:

- Assess applications for financial assistance, as this is the only way for students to receive Financial Assistance in Trinity
- Ensure applications for financial assistance are assessed in a timely and equitable manner and to ensure eligible students will receive Financial Assistance.
- To operate an appeals process for the Student Assistance/ Hardship Funds
- Ensure the University complies with reporting requirements of the funding authorities for the ESF Student Assistance Fund in order to continue to receive funding for the awards.

Legal Basis:

The legal basis for collecting personal data is to comply with our duties under the General Data

Protection Regulation (GDPR). The University will ensure that personal data is processed fairly and lawfully in keeping with the principles of data protection.

How we ensure your consent to gathering, storing and sharing your personal data

Consent:

² See previous footnote

For the purposes outlined in this privacy statement, personal data will be processed on the basis of your informed consent.

When you apply for Financial Assistance you are provided with detailed information on the personal data we collect and how it will be used and the purpose.

You are required to read and indicate your understanding of this privacy statement as part of your application for Financial Assistance and to confirm your consent to the storage and sharing of your personal data as outlined above.

You will also be informed that if you do not agree to the points outlined above you will be unable to apply for Financial Assistance and this will delay allocation of financial assistance for which you may be eligible.

You may withdraw your consent to disclose your information at any time. To withdraw your consent, we require you to advise us in writing that you are withdrawing your consent, this can be done via <u>ug_hardship@tcd.ie</u> (for undergraduates) and <u>pgsupp@tcd.ie</u> (for postgraduates). Please note that in withdrawing your consent you are simultaneously withdrawing your application for Financial Assistance and may not receive part payments if you withdraw your consent during the year.

How we store and secure personal data:

Any personal data we collect will be stored confidentially and securely as required by the University Information Security Policy. The University is committed to ensuring all accesses to, uses of, and processing of University data is performed in a secure manner. In keeping with the data protection principles, we will only store personal data for as long as is Necessary.

For the purposes described here we will store your data securely, as follows:

a. Paper records/documents – from 2017-18 the Senior Tutor's Office no longer acquires any paper documents and will give paper records back to the student once scanned. Paper records posted to the Senior Tutor's Office will be scanned and shredded.

Paper records for academic years prior to 2017-18 are held securely in the Senior Tutor's Office until securely destroyed.

b. Electronic records: all documentation you provide is stored on a secure drive in the Senior Tutor's Office with access to view limited to the staff in the Senior Tutor's Office.
When we store your personal data on our systems the data will be stored either on the University premises or on secure IT platforms within the EEA, which are also subject to European data protection requirements.

How long we will store your data

We will retain your data for the required duration only. Data will be held for seven years in the case of Hardship Fund Awards, Sports Waivers and Benefactions and in the case of awardees from the ESF Student Assistance Fund, for a minimum of seven years and up to a maximum of sixteen years, as required by the European Social Funds. Thereafter the records will be securely destroyed.

Statistical information gathered to monitor and evaluate the Senior Tutor Services will be anonymous.

What are your rights?

You have the following rights over the way we process your personal data.

• Right of Access:

You have the right to request a copy of the personal data we are processing about you and to exercise that right easily and at reasonable intervals.

• Right to Consent

You have the right to withdraw your consent where that is the legal basis of our processing.

• Right of Rectification

You have the right to have inaccuracies in personal data that we hold about you rectified.

• Right of Erasure

You have the right to have your personal data deleted where we no longer have any justification for retaining it subject to exemptions such as the use of pseudonymised data for scientific research.

• Right to Object and Restrict

You have the right to object to processing or restrict the processing of your personal data if:

- \circ The processing is based on public interest or in order to pursue a legitimate interest
- The personal data was processed unlawfully;
- You need the personal data to be deleted in order to comply with a legal obligation;
- Right of Portability

You have the right to have a readily accessible machine-readable copy of your data transferred or moved to another data controller where we are processing your data based on your consent.

Queries and Complaints

Should you have any queries about relating to the processing of your personal data for the purposes outlined above or you wish to make a request in relation to your rights, or any queries regarding this privacy statement, you are invited to raise these in writing to the relevant Student Support Officer:

Ms Helen Richardson, ug hardship@tcd.ie (for undergraduates)

Mr Martin John McAndrew, pgsupp@tcd.ie (for postgraduates)

Further queries thereafter may be addressed to the Senor Tutor:

Dr Aidan Seery, Senior Tutor, stosec@tcd.ie

If you have any queries or complaints in relation to the use of your personal data by the Senior Tutor Services, you can contact the Data Protection Officer for the University as follows:

Data Protection Officer

Secretary's Office, Trinity College Dublin,

Dublin 2, Ireland.

dataprotection@tcd.ie

Finally, if you are not satisfied with the information we have provided to you in relation to the processing of your data you can also make a complaint to the Data Protection Commissioner via the link in their website: <u>Making a Complaint to the DPC.</u>