



# Privacy Notice

**Reference: GDPR001**

Privacy Notice applying to data processing activities undertaken by St Edmund Hall.

*Document Last Modified: 13 October 2018*

Last Review Date: *13<sup>th</sup> of October 2018* (GPBC)

Next Review Date: October, 2019 (GPBC)

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**This privacy notice applies to current staff, office holders and senior members; IT systems (including both internal systems and user's network access); current students, prospective students and applicants who have accepted offers from St Edmund Hall; data processing activities undertaken by St Edmund Hall for security and monitoring relating to staff, students and visitors to St Edmund Hall premises including CCTV, other security and related processing; how St Edmund Hall processes and retains information for its archives; applicants for office, senior membership and employment at St Edmund Hall; attendees, organisers and others involved in St Edmund Hall conferences and events.**

### [A summary of what this notice explains](#)

St Edmund Hall is committed to protecting the privacy and security of personal data.

This notice explains what personal data St Edmund Hall holds about current staff, office holders and senior members, students, student applicants, staff applicants, attendees, organisers, guests and third-party companies and individuals ("you"), how we use it internally, how we share it, how long we keep it and what your legal rights are in relation to it. In addition to those employed by, or otherwise holding College positions, this notice should be read by the self-employed providers and other contractors engaged to provide services to the College. Personal data relating to volunteers who assist with College fundraising, projects and events is also covered by this notice.

This notice applies to all users of St Edmund Hall IT systems, e-mail and telephones/mobile devices. It will apply to anyone allowed to use such systems, including our staff, students and guests.

This notice does not form part of any contract of employment or other contract to provide services.

For the parts of your personal data that you supply to us, this notice also explains the basis on which you are required or requested to provide the information. For the parts of your personal data that we generate about you, or that we receive from others, it explains the source of the data.

There are some instances where we process your personal data on the basis of your consent. This notice sets out the categories and purposes of data where your consent is needed.

St Edmund Hall has also published separate notices, which are applicable to other groups and activities. Those notices may also apply to you, depending on your circumstances, and it is important that you read this privacy notice together with other applicable privacy notices:

1. Alumni and donors (including what financial information we hold about our alumni and how we use it when considering fundraising initiatives). The policy covering this information is available on the St Edmund Hall website under 'Policies'.
2. Website and cookies (including how we monitor use of our website). The policy covering this information is available on the St Edmund Hall website under 'Policies'.

## What is your personal data and how does the law regulate our use of it?

“Personal data” is information relating to you as a living, identifiable individual. We refer to this as “your data”.

“Processing” your data includes various operations that may be carried out on your data, including collecting, recording, organising, using, disclosing, storing and deleting it.

Data protection law requires us:

- To process your data in a lawful, fair and transparent way.
- To only collect your data for explicit and legitimate purposes.
- To only collect data that is relevant, and limited to the purpose(s) we have told you about.
- To ensure that your data is accurate and up to date.
- To ensure that your data is only kept as long as necessary for the purpose(s) we have told you about.
- To ensure that appropriate security measures are used to protect your data.

## St Edmund Hall’s DPO Contact Details

If you need to contact us about your data, please contact the St Edmund Hall Data Protection Officer, whose contact details are:

Dr Charlotte Sweeney

Domestic Bursar

St Edmund Hall

Queens Lane

Oxford

OX1 4AR

United Kingdom

Tel: 01865 279005

E-Mail: [dpo@seh.ox.ac.uk](mailto:dpo@seh.ox.ac.uk)

## Data that you provide to us and the possible consequences of you not providing it

The provision of most data that you provide to us is a contractual requirement. If you do not provide us with information that you are contractually obliged to provide, the consequences will depend on the particular circumstances. In some cases we may not be able to provide you with certain services; in other cases, this could result in disciplinary action or the termination of your contract.

The consequences for any failure to provide such data will depend on the particular circumstances. For example, a failure to provide copies of your passport, right to work and visa information, may mean that we are unable to enter into, or continue with, your employment. A failure to notify St Edmund Hall of relevant conflicts of interest may result in disciplinary proceedings being commenced.

Some data that you give to us is provided on a wholly voluntary basis – you have a choice whether to do so. Examples include:

- Equality monitoring data, which is requested by the College as part of the equality monitoring that we undertake pursuant to our legal obligations under the Equality Act 2010.
- Disability and health condition information, which you may choose to provide to us in order that we can take this information into account when considering whether to make a reasonable adjustment.

### The lawful basis on which we process your data

The law requires that we provide you with information about the lawful basis on which we process your personal data, and for what purposes.

Most commonly, we will process your data on the following lawful grounds:

- Where it is necessary to perform the contract we have entered into with you.
- Where it is necessary for the performance of a task in the public interest.
- Where it is necessary to comply with a legal obligation.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

We may also use your personal information, typically in an emergency, where this is necessary to protect your vital interests, or someone else's vital interests. In a small number of cases where other lawful bases do not apply, we will process your data on the basis of your consent.

### How we apply further protection in the case of "Special Categories" of personal data

"Special categories" of particularly sensitive personal data require higher levels of protection. We need to have further justification for collecting, storing and using this type of personal data.

The Special Categories of personal data consist of data revealing:

- Racial or ethnic origin.
- Political opinions.
- Religious or philosophical beliefs.
- Trade union membership.

They also consist of the processing of:

- Genetic data.
- Biometric data for the purpose of uniquely identifying someone.
- Data concerning health.
- Data concerning someone's sex life or sexual orientation.

We may process special categories of personal data in the following circumstances:

- With your explicit written consent; or
- Where it is necessary in the substantial public interest, in particular:

- is necessary for the purposes of the prevention or detection of an unlawful act, must be carried out without the consent of the data subject so as not to prejudice those purposes; or
- for equal opportunities monitoring.
- Where the processing is necessary for archiving purposes in the public interest, or for scientific or historical research purposes, or statistical purposes, subject to further safeguards for your fundamental rights and interests specified in law.

We have in place an appropriate policy document and/or other safeguards which we are required by law to maintain when processing such data.

Less commonly, we may process this type of data where it is needed in relation to legal claims or where it is needed to protect your interests (or someone else's interests) and you are not capable of giving your consent, or where you have already made the data public.

### Criminal convictions and allegations of criminal activity

Further legal controls apply to data relating to criminal convictions and allegations of criminal activity. We may process such data on the same grounds as those identified for “special categories” referred to above.

Details of the lawful bases we rely on for the processing of the categories of data that we hold in relation to current staff, office holders and senior members are set out in our Record of Processing Activity. Details of retention periods, plus details of parties to whom we transfer data, and on what basis, are available in the ‘Records Of Processing Activity (ROPA)’ on the St Edmund Hall website under ‘Policies’.

### Details of our processing activities, including our lawful basis for processing

We have prepared a detailed table setting out the processing activities that we undertake, the source of the data, the reasons why we process it, how long we keep it and the lawful basis we rely on.

For students and employees, data that you provide to us is processed by us in order that we, and you, can each fulfil our contractual obligations and/or comply with obligations imposed by law. For example:

- Copies of your passport, right to work, and visa information will be collected by us at the time of your application to enable us to comply with UK Immigration and Visa requirements. We may also be required by law to retain that data, along with related information (such as your application paperwork, short-lists and selection committee papers) until a certain point after your employment with the College ends.
- The contact details that you provide to us, including names, addresses and telephone numbers.
- The position, role, grade, salary and benefits attaching to the relevant role, along with your application paperwork, including the results of any testing.
- Details of your qualifications and correspondence in relation to them.
- References received about you, as well as the names and contact details of referees.

- Requests for special arrangements and/or waiver of eligibility criteria, including our consideration and decisions in relation to the same.
- Communications with you regarding the outcomes of your application.
- Records of decisions, including relevant committee and panel reports.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Equality monitoring data.
- Financial data, including your account number and sort code, BACS ID, NI number, salary, tax codes and payments information are collected by us at the time of your appointment to enable us to pay you in accordance with the contract between us.

If the relevant role requires regular interactions with children or vulnerable adults, we are required by law to carry out a Disclosure and Barring Service check in relation to you. In accordance with section 124 of the Police Act 1997, DBS certificate information is only passed to those who are authorised to receive it in the course of their duties and, in line with the DBS code of practice, is not kept by St Edmund Hall for any longer than is necessary.

Our Record of Processing Activity indicates the sources of each of the various categories of data that we process. The table includes monitoring that may occur of use of telephone and IT services, including, subject to certain safeguards, e-mail content, internet use and/or telephone records for the purpose of ensuring that such services are not used for unlawful purposes, or otherwise breach the St Edmund Hall Information Security Policy or the University's IT policies. Safeguards are set out in other College policies/procedures that ensure that an individual's privacy is respected appropriately. The lawful basis for such processing is that St Edmund Hall has a legitimate interest in maintaining the integrity of its systems, to investigate misuse and in taking action to prevent misuse recurring.

Apart from the data that you provide to us, we may also process data about you from a range of sources. The table includes detailed information about how and why we process various categories of data, and the related lawful basis including:

### **Applicants and Prospective Students**

- For the purpose of administering your application, we will process various information on the lawful basis that we have a legitimate interest in receiving, considering and administering applications from prospective students including:
  - details of which courses you are applying for.
  - your application, including your contact details, personal statement, predicted grades and education history.
- Any written work or tests you submit, and our assessment of that work or tests.
- The information we process for these purposes also includes information that we take into account when deciding who to invite for an admissions interview. We may take into account "contextual" data such as relating to information we can access about your school and postcode, and whether you have been in the care system. [Further information about this process is contained here.](#)
- Further, to comply with a legal obligation, namely St Edmund Hall's obligation to ensure, so far as is reasonably practicable, that its staff, students and visitors are not exposed to health and safety risks, we will also process details of any relevant

criminal convictions, allegations or charges that we ask you to declare to us when you apply to us, and of any Disclosure and Barring Service checks that we request. Relevant criminal convictions or charges are those that indicate an applicant or student might pose an unacceptable risk to other students or staff. More information is available for undergraduate admissions at:

<https://www.ox.ac.uk/admissions/undergraduate/applying-to-oxford/decisions/criminal-convictions?wssl=1> and for graduate admissions at: <https://www.ox.ac.uk/admissions/graduate/applying-to-oxford/university-policies/criminal-convictions?wssl=1>

- Processing of criminal convictions and allegations are subject to further controls, as explained above. In this case, the processing is permitted as it is necessary for the exercise of a protective function (the protection of anyone on St Edmund Hall's premises), which must be carried out without your consent so as not to prejudice the exercise of that function, and such processing is necessary for reasons of substantial public interest. The processing may also be necessary for the prevention or detection of unlawful acts. (Once the information has been provided to us, this processing must be carried out without your consent, as the law prohibits us from requiring your consent as a condition of performing a contract with you.)
- Bank and other payment details, where we need to reimburse you, or where you provide such details to us when making a payment. We both have a legitimate interest in processing such data for this purpose.

### **Archives**

- Student files including dates of attendance, course of study and outcome of their studies, results of College examinations ("collections"), University examinations, and College and University assessments, awards, scholarships and prizes conferred, applications (e.g. UCAS forms and references), academic and disciplinary records. These files may include information about a former student's personal life including their health, family circumstances, ethnicity, sexuality, political opinions, religious or philosophical beliefs, criminal convictions or allegations, gender, background, family circumstances and/or financial circumstances. St Edmund Hall has a legitimate interest in processing such data for the purposes of research and its archive in the public interest. St Edmund Hall also considers that it is in the public interest to process special category and/or criminal convictions or allegations data for such purposes.
- Extracts from staff records consisting of employee name, dates of employment, role(s) and reason(s) for departure (including for example retirement, new employment or dismissal), staff photograph, records of references given.
- Other administrative records of St Edmund Hall, for example Governing Body and committee records. Such records may include the personal data of College staff where they are mentioned in Governing Body minutes, for example.
- Other material collected by or donated to our archive.

### **College IT Functions**

- The University of Oxford, which operates a number of systems that Colleges have access to, including e-mail, VLEs, file storage (including cloud), VPN access and library services.

- Information that we generate in the course of operating the College's IT systems, or which we obtain from third party suppliers, for example telephone records provided by suppliers of telephone systems.
- Occasional monitoring that may occur of staff, students and guests where St Edmund Hall has reasons to believe the individual concerned may be guilty of misconduct. Monitoring for such purposes may only be carried out in accordance with the Information Security Policy and the College's Security Policy which includes safeguards to ensure that individual privacy is respected appropriately. The lawful basis for such processing is that St Edmund Hall has a legitimate interest in ensuring that staff comply with their legal obligations as employees.
- Geo-location data.
- The majority of data to any of the St Edmund Hall hosted services is not held in a personally identifiable format for more than 1 year. Data which we need to hold for longer periods will be anonymized where possible.
- Anonymized statistical data is kept indefinitely, but you cannot be identified from such data.
- We adopt data collection, storage and processing practices and security measures to protect against unauthorised access, alteration, disclosure or destruction of your personal information, username, password, transaction information and data stored on our services.

### **College Security and CCTV**

- Apart from the data that you provide to us, we may also generate data about you, for example if you use a St Edmund Hall key to access premises, the St Edmund Hall access control system will generate a log of your attendance.
- CCTV monitoring: both live and recorded for archive.
- St Edmund Hall undertakes to help provide safety and security on college premises, and to assist with the prevention of crime and other unlawful activity. St Edmund Hall may take disciplinary action if a safety or security incident involves a breach of staff or student disciplinary policies, and/or report safety/security incidents to the police if the incident involves an apparent criminal offence. Monitoring for such purposes may only be carried out in accordance with Information Security Policy and the College's Security Policy which includes safeguards to ensure that individual privacy is respected appropriately. The lawful basis for such processing is that the St Edmund Hall has a legitimate interest in ensuring that staff comply with their legal obligations as employees.
- Movement records of staff, students and visitors to St Edmund Hall premises, for example of timing of access to buildings or offices, whether through electronic access systems or manual records. The lawful basis for such processing is that the College, its members and visitors have a legitimate interest in implementing such measures to help maintain College safety and security.

### **Conferences and Events**

- Contact details that you provide to us, including names, addresses and telephone numbers.
- Details of event organisers and guests, including details of organisations represented and event purpose.



- Financial information including your details of invoicing and outstanding payments (including payment information such as credit card or banking payment information) for facilities and services provided by the College at your request.
- Room and meal booking information, including any medical issues and/or disabilities that you have notified to us.
- Dietary requirements.
- Photographs, audio and video recording of events (where applicable).
- Computing and email information, including Guest login information (IP address(es), devices connected, traffic monitoring data).
- Records of requests and bookings for rooms, including records of any decisions the College makes pursuant to its obligation to take such steps as are reasonably practicable to ensure that freedom of speech within the law is secured for members, students and employees of the College and for visiting speakers. The lawful basis for such processing is that the College has a legitimate interest in making its rooms available to members of the College to enable events to be held. Where freedom of speech issues are involved, the processing is necessary for compliance with a legal obligation (namely under the Education (No 2) Act 1986).

#### **Finance, Commercial and Related Administration**

- Apart from the data that you provide to us, we may also process data about you that we generate about you, or that we receive from a third party (for example banks who provide us with your details when payments are made or received by St Edmund Hall).

#### **Staff Applicants**

- The contact details that you provide to us, including names, addresses and telephone numbers.
- The position, role, grade, salary and benefits attaching to the relevant role.
- Your application paperwork, including the results of any testing.
- Details of your qualifications and correspondence in relation to them.
- References received about you, as well as the names and contact details of referees.
- Requests for special arrangements and/or waiver of eligibility criteria, including our consideration and decisions in relation to the same.
- Communications with you regarding the outcomes of your application.
- Records of decisions, including relevant committee and panel reports.
- Copies of passports, right to work documents, visas and other immigration data.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Equality monitoring data.

#### **Staff Et Al.**

- The contact details that you provide to us, including names, addresses and telephone numbers.
- Your position, role, contract terms, grade, salary, benefits and entitlements.
- Records about your recruitment, including your application paperwork, details of your qualifications, references (including names and contact details of referees),

requests for special arrangements, communications regarding our decisions, and relevant committee and panel reports.

- Details of any relevant criminal convictions or charges that we ask you to declare to us, either when you apply to us, or during your membership of the College.
- Relevant criminal convictions or charges are those that indicate you might pose an unacceptable risk to students or staff. Further, your role at the College may require that we conduct a Disclosure and Barring Service check, which will provide us with details of any relevant criminal convictions and/or cautions that you have received.
- Copies of passports, right to work documents, visas and other immigration data.
- Details of any medical issues and/or disabilities that you have notified to us, including any consideration and decision on reasonable adjustments made as a result.
- Equality monitoring data.
- Dietary requirements.
- Your financial details, including bank and building society account numbers, sort codes, BACS IDs, NI numbers, tax codes, pay slips and similar data.
- Pensions membership data, including identification numbers, quotes and projections, terms benefits and contributions.
- Learning and development records, including your attendance, completions, accreditations and certifications.
- Capability procedure records, including performance indicators, records of review meetings, feedback, decisions and outcomes.
- Promotion and progression records, including applications, references and supporting materials, records of deliberations and decisions, feedback and awards.
- Records regarding grievances, disciplinary proceedings or investigations prompted by, involving or relating to you.
- Attendance and absence records, including leave requests, sickness records and related data.
- Photographs, audio and video recording.
- Computing and email information, including login information for our IT systems, IP address(es), equipment allocated to you and records of network access.
- Biometric data, as part of mandatory immigration records.

### **Student Data**

- Data that we and our staff generate about you, such as during tutorials and in connection with your attendance and accommodation at St Edmund Hall.
- The University of Oxford, which operates a number of systems that Colleges have access to, including access your examination results, fees outstanding, degree ceremony bookings, emergency contact details, student loan status, “right to work” checks and visa information, disability information and reports by supervisors.
- Your school or previous educational establishments or employers if they provide references to us.
- Fellow students, family members, friends, visitors to St Edmund Hall and other contacts who may provide us with information about you if and when they contact us, or vice versa.

## How we share your data

We will not sell your data to third parties. We will only share it with third parties if we are allowed or required to do so by law. This includes for example:

- Where we are required to report information about students that are subject to visa controls to UK Visas and Immigration.
- Where we are required to report information to the University of Oxford in order for it to fulfil its obligations to report information to the Higher Education Statistics Agency or its successor body in order to comply with regulatory obligations.
- Where we decide to report alleged criminal misconduct to the police.

It also includes disclosures where the third party is an agent or service provider appointed by St Edmund Hall to enable us to operate effectively, provided we are satisfied that appropriate safeguards have been put in place to ensure adequate levels of security for your data.

Examples of bodies to whom we are required by law to disclose certain data include, but are not limited to:

Organisation	Why?
Home Office; UK Visas and Immigration	To fulfil St Edmund Hall's obligations as a visa sponsor
Disclosure and Barring Service (DBS)	Required for certain posts to assess an applicant's suitability for positions of trust or where the post works with vulnerable people or children.
The Higher Education Funding Council for England (HEFCE) / The Office For Students (OfS)	Data submitted for the Research Excellence Framework (REF) which is a system for assessing the quality of research in higher education.
HM Revenues & Customs (HMRC)	Real time information released to HM Revenue & Customs (HMRC) in order to collect Income Tax and National Insurance contributions (NICs) from employees.

Examples of bodies to whom we may voluntarily disclose data, in appropriate circumstances, include but are not limited to:

Organisation	Why?
Other Colleges and/or PPHs within the University of Oxford, University offices and/or departments	Where a member is employed by or connected to both organisations, or are providing services in different parts of the collegiate university, we may need to share relevant data for the proper functioning of relevant contracts and services.

Agencies with responsibilities for the prevention and detection of crime, apprehension and prosecution of offenders, or collection of a tax or duty	For the prevention, detection or investigation of crime, for the location and/or apprehension of offenders, for the protection of the public, and/or to support the national interest.
Mortgage lender and letting agencies	In order to allow these organisations to verify for mortgages and tenancy agreements. Release of this information is subject to a written request being received from the employee.
Universities Superannuation Scheme (USS) / Oxford Staff Pensions Scheme (OSPS)	In order to provide data required for the provision of pensions by these providers.
Higher Education Statistics Agency (HESA)	Some information, usually in pseudonymised form, will be sent to the HESA for statistical analysis and to allow government agencies to carry out their statutory functions.
Occupational Health providers	To enable the provision of these facilities.
Third party service providers	To facilitate activities of St Edmund Hall. Any transfer will be subject to an appropriate, formal agreement between St Edmund Hall and the processor.

Where information is shared with third parties, we will seek to share the minimum amount of information necessary to fulfil the purpose.

All our third-party service providers are required to take appropriate security measures to protect your personal information in line with our policies, and are only permitted to process your personal data for specific purposes in accordance with our instructions. We do not allow our third-party providers to use your personal data for their own purposes.

More extensive information on the categories of recipients of your data is set out in the 'Records Of Processing Activity (ROPA)' on the St Edmund Hall website under 'Policies'.

### [Automated decision-making](#)

We do not envisage that any decisions will be taken about you based solely on automated means, however we will notify you in writing if this position changes.

### [Sharing your data outside the European Union](#)

The law provides various further safeguards where data is transferred outside of the EU.

When you are resident outside the EU in a country where there is no "adequacy decision" by the European Commission, and an alternative safeguard is not available, we may still

transfer data to you which is necessary for performance of your contract with us, or to take pre-contractual measures at your request.

Otherwise, we will not transfer your data outside the European Union without first notifying you of our intentions and of the safeguards that apply to your data.

### How long we keep your data

The detailed table of processing activities explains how long we will keep your data. In some cases student data is retained permanently for archiving and/or research purposes, as explained in the table. St Edmund Hall's privacy notice relating to its archives has further detail about the information retained in the archive and your rights when data is archived.

We retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting or reporting requirements.

Details of expected retention periods for the different categories of your personal information that we hold are set out in our Record of Processing Activity.

Retention periods may increase as a result of legislative changes, e.g. an increase in limitation periods for legal claims would mean that St Edmund Hall is required to retain certain categories of personal data for longer. Any such changes will be reflected in updated versions of our 'Records Of Processing Activity (ROPA)' on the St Edmund Hall website under 'Policies'.

If there are legal proceedings, a regulatory, disciplinary or criminal investigation, suspected criminal activity, or relevant requests under data protection or freedom of information legislation, it may be necessary for us to suspend the deletion of data until the proceedings, investigation or request have been fully disposed of.

Please note that we may keep anonymised statistical data indefinitely, but you cannot be identified from such data.

### Your legal rights over your data

Subject to certain conditions set out in UK data protection law, you have:

- The **right to request access** to a copy of your data, as well as to be informed of various information about how your data is being used.
- The **right to have any inaccuracies in your data corrected**, which may include the right to have any incomplete data completed.
- The **right to have your personal data erased** in certain circumstances.
- The **right to have the processing of your data suspended**, for example if you want us to establish the accuracy of the data we are processing.
- The right to receive a **copy of data you have provided to us**, and have that transmitted to another data controller (for example, another University or College).
- The **right to object to any direct marketing** (for example, email marketing or phone calls) by us, and to require us to stop such marketing.

- The **right to object to the processing of your information** if we are relying on a “legitimate interest” for the processing or where the processing is necessary for the performance of a task carried out in the public interest. The lawful basis for any particular processing activity we carry out is set out in our detailed table of processing (available on the St Edmund Hall website under ‘Policies’).
- The **right to object to any automated decision-making** about you which produces legal effects or otherwise significantly affects you.
- Where the lawful basis for processing your data is **consent**, you have the **right to withdraw your consent at any time**. When you tell us you wish to exercise your right, we will stop further processing of such data. This will not affect the validity of any lawful processing of your data up until the time when you withdrew your consent. You may withdraw your consent by contacting the St Edmund Hall Data Protection Officer.

Further guidance on your rights is available from the Information Commissioner’s Office (<https://www.ico.org.uk/>). You may also wish to contact St Edmund Hall’s Data Protection Officer if you are considering how or whether to exercise your rights.

You have the right to complain to the UK’s supervisory office for data protection, the Information Commissioner’s Office if you believe that your data has been processed unlawfully.

#### [Future changes to this privacy notice, and previous versions](#)

We may need to update this notice from time to time, for example if the law or regulatory requirements change, if technology changes, if the University makes changes to its procedures, or to make St Edmund Hall’s operations and procedures more efficient. If the change is material, we will give you not less than two months’ notice of the change so that you can decide whether to exercise your rights, if appropriate, before the change comes into effect. We will notify you of the change by email and via the St Edmund Hall website.