



# GDPR, Data Protection, and Privacy Policy

<b>Issue Date</b>	February 2026	<b>Reference</b>	P/003
<b>Next Review Due</b>	February 2027	<b>Review Cycle</b>	Annual
<b>Reviewing Panel</b>	Board of Trustees		
<b>Applicability</b>	Employees Executive Committee Trustees Members Customers		

## 1. Abstract

- 1.1. Josephine Butler Junior Common Room CIO (“the JCR”) is a registered charity registered in England and Wales.
- 1.2. Therefore, the JCR expects its stakeholders to follow all relevant laws in respect to Data Protection, and Privacy.
- 1.3. The purpose of this policy is to detail how data is collected, stored, used, and restrict the scope in which data can be used.
- 1.4. The accounting year for the JCR is from the 1<sup>st</sup> of July to the 30<sup>th</sup> of June the following year, hence the definition of “year” within this policy shall be the accounting year.

## 2. Collection of Data

- 2.1. The primary source of the JCR’s data about individuals is from Durham University. Such details are highlighted in the Data Sharing Agreement (P/004).
- 2.2. Another source of the JCR’s data about individuals is from registrations and payments, which may be as a registration to a student group within the JCR, or by registration to an event held by the JCR.
- 2.3. The JCR may collect the following pieces of data about an individual, which may identify an individual:
  - 2.3.1. Full name – from Durham University, and/or registrations;
  - 2.3.2. Address – from Durham University;
  - 2.3.3. Email Address – from Durham University, and/or registrations;
  - 2.3.4. Picture – from Durham University, and/or any JCR events you may attend;
  - 2.3.5. Banking Information – from any JCR event payments, and/or any reimbursement requests;
  - 2.3.6. Phone numbers – from any group chats which may be formed for a JCR student group;
  - 2.3.7. Membership to any JCR Groups;
  - 2.3.8. Undergraduate fee status;
  - 2.3.9. Information on concessions and withdrawals.

2.4. The JCR may also, consequentially, know sensitive data, through any case where the student opts to be represented by a JCR Sabbatical Officer at any disciplinary hearings, or requests the JCR Sabbatical or Welfare Officers to help with anything related to their wellbeing.

### **3. Storage of Data**

3.1. Any data retrieved from the Durham University systems will stay on Durham University's IT systems, or the JCR's Google Workspace. If they are required an export, then they must be encrypted.

3.1.1. For example, the JCR Website stores a copy of the CIS codes of all members of the college (from which, email addresses can be derived) in an encrypted manner, such that the list can not be converted back to a list of CIS codes.

3.2. Any data regarding event registrations and payments must stay on either Durham University's IT resources, or any devices owned by the JCR. Should data need to be shared with other parties, such as for catering or venue purposes, only the information necessary shall be shared, and it shall be sent through a secure medium.

3.3. Should any data be held in any form other than a digital form, they must be stored in a locked cabinet or office, for which the keys may only be held by any Sabbatical Officers, or officers of Josephine Butler College.

3.4. Photographs are given two separate categories:

3.4.1. Any photograph supplied to the JCR by Durham University shall only be stored on Durham University systems.

3.4.2. Any photographs from events have no restriction on how they are held, as they are not classed as identifying information.

3.5. For information about how the JCR manages photography involving under-18s, please refer to the Safeguarding Policy (P/006).

### **4. Persistency of Data**

4.1. Any data that was sourced from Durham University shall be removed within 365 days after the student has ceased to be a member of Josephine Butler College.

4.2. Any data that is related to registration for the event shall be removed within 365 days after the end of the event. However, any data

regarding events which are to do with payments follows paragraph 4.3.

4.3. Any data that is related to payments, either to or from the JCR, shall be retained up to 28 days after the end of the 6 year period after the transaction was performed.

4.3.1. For instance, if a transaction is made between 01/07/2025 and 30/06/2026, inclusive, and the accounting year of the JCR does not change, the end of the 6 year period would be 30/06/2032, plus 28 days after that would be 28/07/2032.

4.3.2. The 6 year period is dictated by the maximum amount of time HMRC requires records to be kept for, which may be changed based on HMRC's guidance. If another statutory requirement requires this to be extended, for example, if the HMRC starts an investigation against the JCR, and the data was due to be deleted during the investigation, it will be extended up to 28 days after the investigation has concluded.

4.3.3. Should a payment be made in instalments over two or more years, the date of the last payment will be taken.

4.4. Any photographs taken at events may not expire.

4.5. Any documents from disciplinary hearings must be deleted after the subject has ceased to be a member of Durham University, unless Durham University requires the document to be kept longer, or if any policing authority in England requires it. Anything in respect to discipline shall be noted in the Discipline Policy (P/026), and it may supersede anything written in this policy.

4.6. Any data about an individuals debt to the JCR will be deleted at the latest of: 28 days after the debt being cleared, or after a member ceases to be a member of Durham University.

## 5. Data Rights

5.1. An individual is permitted to ask for their data to be deleted by the JCR, unless:

5.1.1. It is for a payment record, including debt records;

5.1.2. It is for a disciplinary record. If the member, however, was not the subject for the discipline, but rather to provide evidence,

the record shall be redacted or deleted, unless impractical to do so.

5.1.3. The data was provided via Durham University's Banner, in which case it can not be deleted.

5.2. An individual is permitted to ask for a Subject Access Request ("SAR"), for any data related to them.

5.2.1. A Sabbatical Officer shall be appointed for this, and shall provide a receipt of the request to the individual.

5.2.2. An SAR must follow all guidance, as set by the Information Commissioner Office.

5.2.3. An SAR must redact any information properly about anyone named or described in any documents, except the subject, including names, and must include any data that the subject is not aware of.

5.2.4. An SAR can not include any pictures of the individual, especially taken at an event.

5.3. The JCR does not collect any data of anyone under the age of 16, as they can not be members of the University of Durham. Anyone at the age of 16 or 17 is not considered an adult, but may be members of the JCR, hence are minors in law. Anything specific for these people shall be noted in the Safeguarding Policy (P/006).

## **6. Data Management**

6.1. The JCR Sabbatical Officers are the only people who are permitted access to all raw data. They may only provide the data to any other individual or organisation if it is required for their work, for example, registration data to caterers and to individuals leading on the event, or to any groups within the JCR who need such data, which may be restricted to just names and contact details.

6.2. The JCR will not give data to anyone else.

## **7. Implementation**

7.1. The Chair of the Board of Trustees, or their deputy, and the JCR President, will ensure that this policy is brought to the attention of all stakeholders.

7.2. The Board of Trustees shall monitor the implementation of this policy through checks at each board meeting. Any breaches of this policy should be reported to the Board of Trustees as soon as a breach has been discovered.

## 8. Approval & Review

8.1. This GDPR, Data Protection, and Privacy Policy was prepared in January 2026 by the Compliance and Governance Officer with the assistance of the JCR President, on behalf of the Board of Trustees.

8.2. This policy shall be reviewed every year by the Board of Trustees, in consultation with the JCR President, and the JCR Executive Committee.

**This GDPR, Data Protection, and Privacy Policy has been approved by the JCR President, and the Board of Trustees.**

Signed David Evans  
Signature



Dated Date 21/02/26

Position **Chair, Board of Trustees**

Signed Joshua Barrett  
Signature



Dated Date 18/02/26

Position **JCR President (2025-26)**