



Information Compliance

Handling Student Personal Data

June 2019

Document properties

Authority

Chief Information Officer

Sponsor

Chief Information Officer

Responsible Officer

Data Protection Officer

Version history

The current version (June 2019) is derived from, and supersedes, the version published in August 2017 and earlier versions.

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Staff should contact the Data Protection Officer if they have any questions regarding disclosure of student information.

2.3 Requests for student information under the Freedom of Information Act

Examples of information which might be disclosed under the Freedom of Information Act are provided in section 5. However, all Freedom of Information requests should be forwarded to the Data Protection Officer for action.

2.4 Subject Access Requests under the Data Protection Act

Students have a right to know

- what information the University holds about them;
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Some of these data are collected for use in statistical analyses, particularly by the Higher Education Statistics Agency (HESA). However, for this purpose, the data are *used* anonymously – there is no connection with a particular person.

3.4 Duties of staff

Each member of staff who has access to student data as part of their job should at all times ensure that:

- data are only used for the purpose(s) for which they were collected
- data confidentiality is maintained at all times
- data accuracy is maintained
- data are held securely – see 3.6 below — Security of data
- only data that are necessary for the conduct of normal University business are retained
- confidential data, whether held in paper format or electronically, are securely destroyed when no longer required.

In addition, all staff should be aware of a student's right to privacy in matters relating to his/her health and welfare, and when advising students, staff should make it clear at the outset of a discussion whether the content is to remain confidential and the extent of the confidentiality to be afforded to any disclosures.

In particular, staff should inform the student of the:

- concern on the part of the University to respect privacy, wherever possible;
- circumstances, if any, under which information might be shared with a third party, taking account of the duty of care which may be owed to the individual and/or others; and
- individuals or University departments or other agencies who might be informed in such circumstances.

All staff should also inform a student, at the outset, of any limits to

8 Appendix A – External disclosures

8.1 Parents/spouses/other relatives

Students' relatives **do not** have a general right to information about their child/partner/relative, something which they often assume.

Information can only be provided if the student has given their permission.

If someone claiming to be a parent/spouse/partner or relative contacts the University wanting information, take their details and contact the student and ask them to contact the individual directly.

Do not confirm or deny that the person the caller is asking about is a student.

8.2 Sponsors

Sponsors and similar bodies (e.g., LEAs, Embassies, High Commissions, private companies, charities, etc.) **do not** have a general right to information about 'their students' personal data, although the University may provide academic information.

If you receive a request from a sponsor, ask them to submit their request in writing. If, on receipt of the request, you are unsure whether to release the information, contact your Head of Department or Data Protection Officer (Information Services).

8.3 Schools/colleges

Students' former schools/colleges **do not** have a right to information about their former pupils.

Information can only be provided if the student has given their permission.

If you receive a telephone request from a school, ask them to submit their request in writing and offer to forward their request to the student(s) concerned.

8.4 Potential employers

Potential employers of students **do not** have an automatic right to information about our students.

However, if a potential employer, or an agency conducting

person may be a danger to him/herself or others), in which case information may be released directly.

8.7 Bailiffs

Bailiffs **do not** have an automatic right to information about our students. Information must only be given if a court order is produced.

If the bailiff produces a court order then information can be provided. However, the bailiff should be directed to the Data Protection Officer or the Head of Security and Emergency Planning. The member of staff who deals with the request will ensure that copies of the information released, together with a photocopy of the court order and bailiff(h a pho1(h a ph)10.5 ((r)2)[Pi-6.6 (he7a)107-2 (ou)hel(i)

- information is required to be released under the Freedom of Information Act 2000. In this case, information should only be released after consultation and agreement with the Data Protection Officer or Chief Information Officer

