



KEELE UNIVERSITY

DATA PROTECTION POLICY

1.0 Introduction

- 1.1. It is a legal requirement under the Data Protection Act 1998 that the University complies with this legislation.
- 1.2. Keele University is committed to supporting and implementing the Act and this document provides the policy statement and framework through which this compliance is achieved.

2.0 Context

- 2.1. 'Personal Information' as defined by the Data Protection Act is information which relates to a living individual and from which this individual can be identified, either directly or indirectly.
- 2.2. Personal Information is held in, or can form part of, many records including student records, staff files and identifiable research data. Personal Information is variable and diverse in its nature and is often crucial to the business needs of the University
- 2.3. It is the responsibility of all individuals within the University to ensure that Personal Information is handled with care and in compliance with this policy and the Data Protection Act 1998.

3.0 Scope

- 3.1. This policy applies to all Personal Information that is created, received or maintained by staff and students at Keele University.
- 3.2. This policy applies to all members of the University, including staff, students and others acting on behalf of the University who are given access to University records and information.
- 3.3. This policy applies to all records of Personal Information regardless of format, i.e. both hard copy and electronic records, formal and informal.

4.0 Notification and Authorised Recipients

- 4.1. In compliance with the Data Protection Act 1998, the University will notify the Information Commissioners Office (statutory regulator of the Act) of the reasons why personal data is collected and used.
- 4.2. Keele University's notification allows the University to hold data under ten Purposes:
 - Staff
 - Agent and Contractor Administration
 - Advertising
 - Marketing
 - Public Relations
 - General Advice Services
 - Accounts and Records
 - Education
 - Student and Staff Support Services
 - Research

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- Other Commercial Services
 - Publication of the University Magazines and Handbooks
 - Crime Prevention and Prosecution of Offenders (eg. CCTV)
 - Alumni Relations
- 4.3. Disclosure of information held under the Registered Purposes will only be permitted to those authorised recipients as defined under the Data Protection Act.
- 4.4. The University will only disclose personal information to authorised recipients where to do so is both allowed by the provisions of the Data Protection Act and it is deemed appropriate to do so.
- 4.5. Disclosure of any information covered by the Data Protection Act must only be allowed with the permission of the designated Data Protection Officer within the Governance Team.

5.0 Principles

- 5.1. When processing personal information, the University will do so in accordance with the eight Data Protection Principles, which states that information must be:
- Fairly and lawfully processed;
 - Processed for limited purposes;
 - Adequate, relevant and not excessive;
 - Accurate;
 - Not kept for longer than is necessary;
 - Processed in line with your rights;
 - Secure;
 - Not transferred to countries without adequate protection.

6.0 Roles and Responsibilities

- 6.1. It is the responsibility of all members of Keele University to comply with this policy and the Data Protection Act 1998 legislation. This includes staff, students and those who are contracted to the University for a particular service or research project.
- 6.2. The Governance Team are responsible for ensuring that the University has sufficient policies, guidance and training available in order for the University to comply with the Data Protection Act legislation.
- 6.3. Senior Management are responsible for ensuring that their staff within their areas are made aware of the existence and contents of this policy.
- 6.4. Students have the responsibility for ensuring they comply with this policy and the legislation. Students should not compile or maintain files containing personal information without the express permission of the appropriate member of staff.

7.0 Subject Access Requests

- 7.1. Staff, students and other data subjects in the University have the right to access any personal information that is held by the University about them.

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Individuals should submit a Subject Access Request in writing to the University Data Protection Officer to receive this information.

- 7.2. Requests for information should clearly state what information is being requested.
- 7.3. The University will respond to Subject Access Requests in accordance with the Data Protection Act legislation. Requests for personal information will be dealt with as quickly as possible and within the 40 calendar days time period as defined by the Act.

8.0 Verification and Fees

- 8.1. It may be necessary, to prevent fraudulent behaviour, to require verification of an individual's identity when processing a Subject Access Request. This would normally be in the form of photographic identification.
- 8.2. Parents, relatives or others (such as Solicitors) are not able to make Subject Access Requests or access any personal information regarding a member of staff or student without the written consent of the individual in question. Verbal confirmation by the individual is not sufficient.
- 8.3. The University may charge £10 for each Subject Access Request made under the Act.

9.0 Complaints and Requests for Cessation of Processing

- 9.1. Complaints about the processing of a Subject Access Request or the processing of personal information should be made to the Data Protection Officer in the first instance.
- 9.2. The University will respond to complaints within 28 days of receipt of the complaint.
- 9.3. Individuals who want to request that their personal information is NOT processed by the University should do so in writing to the Data Protection Officer.
- 9.4. Requests for the cessation of personal information processing will be actioned and responded to as quickly as possible and within 28 days.
- 9.5. If a complainant remains dissatisfied with the outcome of their complaint, they may see an independent review from the Information Commissioner's Office (ICO), which is the independent body responsible for overseeing the act. The ICO can be contacted using the following address:

Information Commissioner's Office

Wycliffe House
Wilmslow
Cheshire
SK9 5AF

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