

Data Protection Policy

Version History – Data Protection Policy

Version	Author	Revisions Made	Date
1	S. Mereweather	First Draft	October 2008
2	S. Mereweather	Revisions after review	July 2009
3	S. Mereweather	Reviewed – no changes made	January 2015

Sign Off

Name	Position	Final Sign Off
James Newby	Director of Traded Services and Business Support	Policy and Strategy taken by James Newby to the Executive Board 2009.

DATA PROTECTION POLICY

1. Introduction

- 1.1 The Data Protection Act 1998 applies to all personal information about living individuals held either electronically or in a manual filing system.
- 1.2 The University of Surrey holds and processes information about its current, past or prospective employees, applicants, students, alumni and others who are defined as **data subjects** under the Data Protection Act. The University processes personal information for a variety of reasons such as administering the admissions process, operating payroll, recording academic progress, monitoring attendance, and enabling references to be provided. The University may also be required by law to collect and use certain types of personal information to comply with the needs of government departments for business and other data.
- 1.3 The University of Surrey takes the protection of all personal information extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal information.

2. Principles

- 2.1 All users of personal information within the University must comply with the eight Data Protection Principles. The Principles define how data can be legally processed. Processing includes obtaining, recording, holding or storing information and carrying out any operations on the data, including adaptation, alteration, use, disclosure, transfer, erasure and destruction. The eight Principles state that:
 1. Personal data shall be processed fairly and lawfully
 2. Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or purposes
 3. Personal data shall be adequate, relevant and not excessive in relation to the purpose for which it is processed
 4. Personal data shall be accurate and, where necessary, kept up to date
 5. Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose
 6. Personal data shall be processed in accordance with the rights of data subjects under the Data Protection Act
 7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data
 8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data

3. Responsibilities

- 3.1 Senior Managers have a responsibility to ensure compliance with the Data Protection Act and this policy, and to develop and encourage good information handling practices within their areas of responsibility
- 3.2 The University has a nominated Information Compliance Officer who is responsible for co-ordinating day to day data protection functions.

This includes: development and implementation of the policy; notifying the Information Commissioner; responding to individual requests for access to personal

information; and framing guidelines and procedures with the aim of ensuring that all personal information processed by the University of Surrey complies with the Data Protection Act 1998.

3.3 Each department within the University will assign a member of staff to work with the Information Compliance Officer to disseminate guidance and standard information relating to data protection.

3.4 All staff have a responsibility to ensure they process personal information in accordance with the eight Data Protection Principles and other requirements of the Data Protection Act.

In particular, whenever a new form of processing data or an adaptation of an existing system is contemplated which would result in personal information being used for a different purpose than the one for which it was originally collected, those concerned must seek advice to ensure that the proposed processing complies with the requirements of the Data Protection Act.

3.5 Academic and academic-related staff are responsible for the conduct in data protection matters of the students they supervise.

Students should only obtain or use personal information relating to third parties for approved research or other legitimate University-related purposes with the knowledge and express consent of an appropriate member of staff who is responsible for their supervision. The use of personal data by students should be limited to the minimum amount of data which is reasonably required to achieve the desired academic objectives. Wherever possible, personal information should be de-personalised so that the data subjects cannot be identified.

3.6 The Information Compliance Unit will perform periodic audits to ensure compliance with this policy and to ensure that the notification to the Information Commissioner is kept up to date.

4. Access to personal information

4.1 The Data Protection Act gives data subjects the right to access any personal information held about them by the University of Surrey.

4.2 Any person can exercise this right by submitting a Subject Access Request form, available from the Information Compliance Unit. Any formal subject access request must be responded to within the 40 calendar days laid down by the Data Protection Act, and must be notified to the Information Compliance Unit as soon as they are received.

The University will normally charge the prescribed maximum fee (currently £10) for each subject access request.

5. Information Compliance Officer

5.1 The University of Surrey has notified to the Information Commissioner's Office that it processes personal data for a number of specified purposes. Any queries relating to the terms of the notification or other matters on the operation of the Data Protection Policy and Data Protection Act should be raised with the University's Information Compliance Officer who can be contacted by email on Freedomofinformation@surrey.ac.uk

6. Review of the policy

6.1 This policy will be reviewed once every three years and, if necessary, amended to ensure continued compliance with the Data Protection Act.