



# **Information Compliance**

## **Handling the Personal Data of Staff and Students**

September 2024

(Draft)

## Document properties

### Authority

University Secretary and General Counsel

### Sponsor

University Secretary and General Counsel

Table of Contents

1 Introduction..... 5

2 Executive summary and key points..... 5

    2.1 Collection and management of data..... 5

    2.2 Disclosure of personal data..... 5

    2.3 Subject Access requests under the Data Protection Act ..... 6

    2.4 Related policies and further guidance ..... 6

3 Collection and management data.....

---

9.7	Statutory bodies.....	18
9.8	Police and other law enforcement bodies.....	18
9.9	Bailiffs.....	19
9.10	Solicitors and legal representatives.....	19
9.11	UK Visas and Immigration .....	19
9.12	Media.....	20
9.13	Emergency disclosures.....	20
10	Appendix C Services bound by a professional code of ethics.....	21
10.1	Mental health advisors and medical services .....	21
10.2	Disability and Dyslexia Service .....	21
10.3	Professional Development Centre.....	21
10.4	International students.....	21

# 1 Introduction

The Data Protection Act 2018 (incorporating the UK General Data Protection Regulation (UK GDPR)) and the Freedom of Information Act 2000 are the two pieces of legislation that govern access to information about individuals held by the University.

The Data Protection Act is concerned with personal information about an individual, for example, name, address and date of birth, and lays down sensible rules for the handling of personal data. The Act also confers rights on any individual about whom personal information is processed or held. The Freedom of Information Act provides a general right of access, subject to certain prescribed exemptions, to all information such as policies and procedures, committee minutes and papers held by the University.

Anyone who handles personal information must not only comply with the requirements of the Data Protection Act 2018 and the Freedom of Information Act 2000 but will be expected to understand that the need for confidentiality extends far beyond the requirements of the Acts, particularly where special category personal information is concerned.

This policy has been developed  
Policy

and Information Access



## 3 Collection and management data

### 3.1 Collection of data

#### 3.1.1 For staff

Information about staff is obtained from University job applications and other forms/documents connected to employment at the University. In addition, some personal data will be collected from referees.

#### 3.1.2 For students

Information about our students is obtained from UCAS and other Admissions Clearing Houses, from the University application and enrolment forms, and from individual students themselves. The career from admission to graduation, through to alumni and confirming qualifications into the future.

### 3.2 Purposes for which data are held

The University needs to hold personal information about employees for various administrative purposes and about students for various teaching, research and administrative purposes in order to administer their academic career, including:

- administration of salary, pensions, sickness and other payments

- academic qualifications

- training and development

provision of advice and support to students via, amongst others, Student Services, personal tutors, Student Wellbeing and Professional Development Cq062tiW\*niW\*niW\*niW\*niW3j0000208871 0 59



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





All requests for personal information received from the individual person concerned, even if requested under the Freedom of Information Act, will always be dealt with as a Subject Access











## 9 Appendix B External disclosures for students

### 9.1 E-mail

Every Student who studies at Brunel University London will receive a [brunel.ac.uk](mailto:brunel.ac.uk) email account. Although an e-mail address is considered to be personal data (because it reveals the student name and place of study), the account belongs to the University. Likewise, all e-mail sent to or from a University-supplied account belongs to the University and is considered to be part of official University records. The University e-mail account should not be used for personal e-mail (see the IT Acceptable Usage Policy).

University e-mail is subject to disclosure under both the Data Protection Act and the Freedom of Information Act.

### 9.2 Parents/spouses/other 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.

### 9.3 Sponsors

Sponsors and similar bodies (e.g., LEAs, Embassies, High Commissions, private companies, charities, etc.) **do not** 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 the Privacy Team at [data-protection@brunel.ac.uk](mailto:data-protection@brunel.ac.uk).

### 9.4 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.

### 9.5 Potential employers

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

If a potential employer, or an agency conducting personnel checks for a potential employer, requests verification of a degree award, this information can

e verification system, VerifyAward. The system allows past

students/alumni to link and share documents with third parties in a secure and efficient way. Date ranges for available data are as advertised.

If they are unable to access VerifyAward then the request must be in writing (email or letter) on and subject of the award and the request includes a release form from the student. To ensure the information being verified is for the right person, it may be necessary to request the date of birth and/or year of the reward.

If you rereW004C5005g30.000008871 0 595.32 84 0 1 305.57 709.18 Tm11.04 Tf100088741000887410008805





## 10 Appendix C