

## **Code of Practice on handling Personal Information**

### **Introduction**

1. This Code concerns the collection, holding and disclosure of data relating to individuals.
2. The Code is guidance to those members and staff of the University who collect or have access to personal data. It is a substitute neither for the statutory requirements contained in the Data Protection Act 1998, nor for the conditions of the University's data protection notification. In any case of conflict, statutory requirements and conditions take precedence over the Code.
3. Personal data are any data relating to an identified individual or to an individual who may be identifiable from those data if put together with other data. They include data held on computer files or in manual records or in other forms such as microfilm.

### **Collection of personal data**

4. Data should normally be collected only for the purposes set out in paragraphs 5 to 7 below, unless provided voluntarily by the data subject.
5. Data on applicants for employment, employees and former employees relevant to:
  - (a) the selection of an applicant for appointment to a post,
  - (b) the future, present and past employment of an employee,
  - (c) research activities and projects,

in all cases including such data as are required to be held by law or as a condition of the University's participation in funding and pension arrangements. The term employee is to be construed widely in this case, to include consultants, part-time workers, and visiting and retired workers still engaged in activities normally performed by employees.
6. Data on applicants for admission, students and former students relevant to:
  - (a) the selection of an applicant for admission,
  - (b) a student's progress while at the University (i.e. the data required for administrative purposes), including his or her academic record,
  - (c) a student's and former student's applications for employment or further study,
  - (d) a student's subsequent employment record in so far as it is made known to the University and as it may be useable in connection with alumni activities,
  - (e) research activities and projects,

in all cases including such data as are required to be held by law or as a condition of the University's participation in funding arrangements.

7. Data on other persons: data relevant to their relationship with the University, including research activities and projects and to the University's commercial relationships with suppliers of goods and services.
8. The University will collect data both fairly and lawfully, and only when relevant to the specific and lawful purposes for which they are needed. In all cases the data collected should be no more than are sufficient for the purposes for which they are collected.
9. In all cases the University will positively attempt not to include in the personal data collected on any person, in so far as it is within the law to attempt to do so, information on that person's sexual orientation or political beliefs or activities.

### **The maintenance of personal data**

10. The University will hold data both fairly and lawfully. Data should be held only when relevant to the specific and lawful purposes for which they are needed. In all cases the data held should be no more than are sufficient for the purposes for which they are held.
11. All personal data must be held securely and in confidence, subject to the disclosure provisions set out in this Code. All persons having access to such data, whether employees or students or in some other capacity, must treat as confidential all information of a private nature about an individual (which is not otherwise in the public domain) which they may learn and shall not communicate it to other persons or bodies except as provided for under this Code.
12. Every effort will be made to ensure that data held are accurate and where relevant kept up to date. Personal data no longer likely to be needed by the University will not be retained, and surplus data will be destroyed without hazard to its confidentiality.

### **The disclosure of personal data**

13. Personal data may be disclosed only in accordance with the provisions of this Code. Data held for a given purpose will not be used or disclosed in any manner incompatible with that purpose.
14. The Data Protection Act gives the data subject the right to request copies (at a cost of £10) of documents and records constituting personal data about the data subject.
15. Not all data held will be disclosed by the University in response to a request from the data subject. The University is obliged to consider whether it should disclose information:
  - (a) where disclosure would simultaneously disclose data about another person (unless that person consents to the disclosure), or
  - (b) where the data was supplied in the expectation that the data subject would not see it (unless the supplier of the data consents to the disclosure).
16. University employees and officers have the right of access to the personal data of others only in so far as their duties require this.

17. Data not already in the public domain will not normally be communicated to those requesting it from outside the University except
  - (a) where it is required by law or as a condition of funding, either of the University or of the student or employee, or
  - (b) where it is deemed to be in the vital interest of the data subject, or
  - (c) with the consent of the data subject.
  
18. The University will take reasonable steps to advise data subjects of the purposes for which it will use the personal data held about them.

**Data Protection Officer**  
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