Data Protection Policy

1 Purpose and scope

The University of Reading is committed to protecting the rights and privacy of individuals in accordance with the Data Protection Act 1998 (DPA). The University needs to process certain personal data about staff and students in order to fulfil its purpose and to meet its legal obligations to funding bodies and the government. The University will process such information according to the Data Protection Principles that are set out in the DPA.

To ensure that all staff, students and others who process personal data on behalf of the University are doing so in accordance with these principles at all times the University has developed this Data Protection Policy together with a series of detailed guidelines, the Data Protection Policy Guidelines.

2 Role of the University

The University is the data controller under the DPA and is ultimately responsible for implementation of the DPA.

The University appoints a Data Protection Officer, who provides the University’s primary contact to the Information Commissioner, and is responsible for ensuring provision of suitable DPA advisory, training and awareness services, DPA request handling, ensuring compliance with Information Commissioner actions, and for keeping the Information Strategy Committee and Vice-Chancellor aware of relevant DPA issues.

Annually, the University will notify the Office of the Information Commissioner that personal data is being processed and list the categories of personal data that are being processed.

3 Governance

This policy has been approved by the Senior Management Board (SMB) and the University Council. It is one of several information management policies which support the University’s corporate plan and information strategy.

It will be reviewed with other information compliance policies and guidelines on a rolling 4-year review cycle. Responsibility for undertaking the review rests with the Information Strategy Committee (ISC), reporting to the SMB.

Heads of Schools and Directorates are responsible for ensuring that this policy is observed. A contact should be identified within each School or Directorate office to provide local support in this respect.

If anyone considers that the policy has not been followed, they should raise the matter with the Data Protection Officer.
4 Rights of staff, students and third parties

4.1 Rights of data subjects to access personal data

All data subjects have the right to access the information held about them, ensure that it is correct and fairly held, and to complain to the Data Protection Officer, as described in Data Protection Policy Guidelines, if they are dissatisfied.

All requests to access personal data will be handled according to the DPA as detailed in Data Protection Policy Guidelines.

Data subjects include all staff and students of the University and any other person about whom the University processes personal data (third parties).

4.2 Opt out rights

The University may not always seek the consent of data subjects when processing personal data, for example, when processing for normal business purposes or when the information is already in the public domain.

If any person has good reason for wishing their details to remain confidential in any such instance, they should contact the Data Protection Officer.

5 Responsibilities of staff, students and third parties

5.1 Persons who process personal data on behalf of the University

Anyone who processes (stores or uses) personal data on behalf of the University has a responsibility to ensure that the Data Protection Principles are observed.

Detailed advice on how to achieve this is given in the Data Protection Policy Guidelines, which summarise detailed guidance from the Office of the Information Commissioner, JISC Code of Practice and local advice from the University’s Data Protection Officer.

5.1.1 Staff

Staff who, as part of their responsibilities, process personal information about other people (for example, about students’ course work, personal circumstances of other members of staff or research data from human subjects), must comply with this Data Protection Policy and its associated Data Protection Policy Guidelines.

Staff who supervise students who will be processing data as part of their studies should inform their School contact or the University’s Data Protection Officer to ensure that the activity is covered by the University’s registration with the Information Commissioner.

5.1.2 Students

Students who are considering processing personal data as part of their studies must notify and seek approval from their supervisor before any processing takes place.

5.1.3 Others working for and on behalf of the University

Others working for and on behalf of the University, usually called third parties, who handle personal data in connection with the University should operate in accordance with the DPA
and details of any such processing should be subject to written agreements between the University and the third party. See Data Protection Policy Guidelines for further details. Such third parties include external supervisors, external examiners, suppliers or customers.

5.2 Persons who provide personal data to the University
Everyone who provides personal data to the University is responsible for ensuring adherence to the Data Protection Principles, especially with regard to accuracy and, in the case of third parties providing the personal data of others, the right to disclose this personal data.

6 Terms and definitions
All terms and definitions used in this document are defined in a glossary and are used in accordance with the terms used in the DPA and the Office of the Information Commissioner.

IMPS, Governance Directorate
Approved by Senior Management Board, June 2007