

# Downing College

## Data Protection Policy

Downing College acknowledges its responsibilities with regard to the requirements of the *Data Protection Act 1998* (hereafter called the "Act"). This document provides the policy framework through which compliance with these requirements can be achieved and audited. It covers:

1. Scope of the policy
2. Responsibilities
3. Relationships with existing policies
4. Available guidance
5. Subject access requests
6. Register of personal data systems
7. Charges
8. Complaints
9. Contacts
10. Review and approval
11. Version control

### **1. Scope of the policy**

1.1 The purpose of this Policy is to ensure that the College and the College's staff and students comply with the provisions of the Act when processing personal data.

1.2 Any potential infringement of the Act will be investigated by the College. If an infringement has taken place then disciplinary procedures may be considered.

1.3 The College is required to adhere to the eight principles of data protection as laid down by the Act. In accordance with those principles personal data shall be:

1. Processed fairly and lawfully
2. Processed for specified purposes
3. Adequate, relevant and not excessive
4. Accurate and up to date
5. Not kept longer than necessary
6. Processed in accordance with the data subject's rights
7. Kept secure
8. Not transferred outside the countries of the European Economic Area without adequate protection.

### **2. Responsibilities**

2.1 The College recognises its corporate responsibility under the Act and is the data controller. The Senior Officer with overall responsibility for this policy is the Senior Bursar, with support from the Data Protection Officer.

2.2 The officer responsible for day to day maintenance of Data Protection procedures is the Records Manager, who is tasked with drawing up guidance and promoting compliance with this policy in such a way as to ensure the easy, appropriate and timely retrieval of information.

2.3 The Records Manager has access to all relevant documents relating to a legal compliance request and it is the Data Protection Officer and the Senior Bursar (in consultation with the relevant department) that will make the decisions regarding what information is released or exempted.

2.4 New members of staff will receive an introductory briefing on the procedures covered under the Act as part of their induction. Additional training will be made available for those members of staff with additional data handling responsibilities.

### **3. Relationship with existing policies**

This policy has been formulated within the context of the following College documents, published on the College website at <http://www.dow.cam.ac.uk/about/documents-and-policies/records-management-foi-and-data-protection-policies>

- Downing College Information Strategy (*in preparation*)
- Freedom of Information Policy
- Records Management Policy

### **4. Available guidance**

Further guidance on the procedures necessary to comply with this Policy is available from the Data Protection Officer or the Records Manager.

### **5. Subject access requests**

5.1 The College is required to permit individuals to access their own personal data held by the College. Any person wishing to access information about them self should make a subject access request and contact the Data Protection Officer or the Records Manager. Further guidance about making a request can be found at <http://www.dow.cam.ac.uk/about/documents-and-policies/freedom-information/making-freedom-information-or-data-protection>

5.2 The College aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within the 40 day limit set down by the Act. Individuals will not be entitled to information to which any of the exemptions in the Act applies. However, only those specific pieces of information to which the exemption applies will be withheld, and information covered by an exemption will be subject to review by the Records Manager and the Data Protection Officer.

### **6. Register of personal data systems**

6.1 To aid the efficient administration of the College's Data Protection Policy, the data which the College holds or processes has been divided into a number of "Data Areas". In each area, there is also specified a "Data Area Contact".

6.2 The Data Area Contact will be responsible in relation to the data in the Data Area in question (and thus not simply for the files which he or she maintains) for the following:

- informing the Data Protection Officer of proposed processing of personal data within the College which may need to be notified to the Information Commissioner;
- providing personal data to the Data Protection Officer/Records Manager in response to a subject access request when requested to do so by the Data Protection Officer/Records Manager; and
- maintaining the security of, and access to, personal data within the Data Area.

6.3 The Data Protection Officer may from time to time designate other Data Areas and/or Data Area Contacts. A full list of Data Areas and Contacts is maintained by the Data Protection Officer/Records Manager and may be reviewed on request.

## **7. Charges**

The College currently charges £10 to make a subject access request, however the College reserves the right to review this fee at any time, in accordance with legally stipulated minimum/maximum fees. This fee must be paid in full before a request will be complied with.

## **8. Complaints**

8.1 The Senior Bursar will coordinate any complaints received in respect of this Policy. The complaint should be addressed to the Senior Bursar in the first instance. The complaint will be acknowledged immediately and every reasonable effort will be made to offer a more comprehensive reply within 21 days.

8.2 If applicants are dissatisfied with the outcome of the complaints procedure they may seek an independent review from the Information Commissioner. Requests for review by the Information Commissioner should be made in writing to:

The Information Commissioner  
Wycliffe House  
Water Lane  
Wilmslow  
Cheshire SK9 5AF  
Tel: 01625-545-700  
Fax: 01625-545-510

## **9. Contacts**

Data Protection Officer:  
Rob Beardwell  
Assistant Bursar  
Downing College  
Cambridge CB2 1DQ  
data.protection@dow.cam.ac.uk

Records Manager:  
Paul Boulton  
Downing College  
Regent Street  
Cambridge CB2 1DQ  
data.protection@dow.cam.ac.uk

Senior Bursar:  
Dr Susan Lintott  
Downing College  
Regent Street  
Cambridge CB2 1DQ  
senior.bursar@dow.cam.ac.uk

### 10. Review and approval

This Policy has been approved by the Information Management Committee of the College and will be subject to an annual review.

### 11. Version control

Date	Version	Reason for change	Author
11/05/2015	0.1	Initial draft	Paul Boulton
19/08/2015	1.0	Publication	Paul Boulton
17/05/2017	1.1	Updated contact details and website links	Paul Boulton