

Christ Redeemer College

Data Protection Policy

Introduction

Christ Redeemer College needs to keep certain information about its employees, students and other users to allow it to monitor performance, achievements, and health and safety, for example. It also needs to process information so that staff can be recruited and paid, courses organised and legal obligations to funding bodies and government complied with. To comply with the law, information must be collected and used fairly, stored safely and not disclosed to any other person unlawfully. To do this, the College must comply with the Data Protection Principles, which are set out in the [Data Protection Act 1998](#) (“the Act”).

In summary these state that personal data shall:

- Be obtained and processed fairly and lawfully and shall not be processed unless certain conditions are met.
- Be obtained for a specified and lawful purpose and shall not be processed in any manner incompatible with that purpose.
- Be adequate, relevant and not excessive for those purposes.
- Be accurate and kept up to date.
- Not be kept for longer than is necessary for that purpose.
- Be processed in accordance with the data subject's rights.
- Be kept safe from unauthorised access, accidental loss or destruction.
- Not be transferred to a country outside the European Economic Area, unless that country has equivalent levels of protection for personal data.

Anyone who processed data on behalf of the College, including staff (including honorary staff), students, volunteers, contractors or others who process or use any personal information must ensure that they follow these principles at all times. In order to ensure that this happens, the College has developed the Data Protection Policy.

Status of the Policy

This policy does not form part of the formal contract of employment, but it is a condition of employment that employees will abide by the rules and policies made by the College from time to time. Any failures to follow the policy can therefore result in disciplinary proceedings.

Any member of the College, who considers that the policy has not been followed in respect of personal data about themselves, should raise the matter with the Rector or the Deputy Rector initially. If the matter is not resolved satisfactorily it could be raised as a formal grievance or complaint.

Responsibilities of Staff

All staff are responsible for:

- Checking that any information that they provide to the College in connection with their employment is accurate and up to date.
- Informing the College of any changes to information, which they have provided, eg changes of address.
- Informing the College of any errors or changes in staff information. The College cannot be held responsible for any such errors unless the staff member has informed the College of them.

If and when, as part of their responsibilities, staff collect information about other people, (eg about students' course work, opinions about ability, references to other academic institutions, or details of personal circumstances), they must do so ensuring that they comply with the Data Protection policy.

Data Security

All staff and students are responsible for ensuring that:

- Any personal data, which they process, is kept securely.
- Personal information is not disclosed accidentally or otherwise to any unauthorised third party.

Student Obligations

Students must ensure that all personal data provided to the College is accurate and up to date. They must ensure that changes of address etc are updated on the student registration system.

Students may, as part of a project, process personal data. If they do so they must comply with the College's Data Protection Policy.

Rights to Access Information

Staff, students and other users of the College have the right to access any personal data that is being kept about them either on computer or in certain files. Any person who wishes to exercise this right should contact the Compliance Officer, in writing.

The College may make a charge of £10 on each occasion that access is requested.

The College aims to comply with requests for access to personal information as quickly as possible, but will ensure that it is provided within 30 days.

Subject Consent

In many cases, the College and the University process personal data with the consent of the individual. If the data is sensitive, express consent must almost always be obtained. Agreement to the University processing some specified classes of personal data is a condition of acceptance of a student onto any course, and a condition of employment for staff. This includes information about previous criminal convictions in accordance with the Rehabilitation of Offenders Act 1974.

All prospective staff and students will be asked to consent to their data being processed when an offer of employment or a course place is made. A refusal to sign such a form without good reason may result in the offer being withdrawn.

Processing Sensitive Information

Sometimes it is necessary to process sensitive personal information. This may be to ensure the College is a safe place for everyone.

Retention of Data

The College will keep some forms of information for longer than others.

Data on students, including any information on health, race or disciplinary matters, will be destroyed after 10 years but a skeletal record will be retained to include a full transcript of academic achievements.

The College will need to keep central personnel records indefinitely. This will include information necessary in respect of pensions, taxation, potential or current disputes or litigation regarding the employment, and information required for job references.

Research data must be retained in accordance with the Code of Practice for Research.

Compliance

Compliance with the Act is the responsibility of all members of the College. Any deliberate breach of the data protection policy may lead to disciplinary action being taken, or access to College facilities being withdrawn, or even a criminal prosecution. It may also result in personal liability for the individual. Any questions or concerns about the interpretation or operation of this policy should be taken up with the Rector or the Deputy.