ST HILD COLLEGE

DATA PROTECTION POLICY

Introduction

Staff, tutors, and students are asked to read this notice, which St Hild is required to provide in order to comply with the Data Protection Act 1998. It sets out the information held by St Hild about individuals, the sources of this information, the reasons for holding this data, and the people who have access to these records.

Under the Act you are entitled to request a copy of all the personal data we hold about you, and you may request this information at any time by completing and returning a "Standard Request Form for Access to Data" (Appendix 1); subject to a small fee to cover the cost of photocopying. However, preparation of this material will involve a considerable amount of work by staff, and so we hope you will help us to develop 'good practice' by providing ample notice, and, wherever possible, specifying the kind of information you would like to see. Please note that there are certain circumstances defined under the Act where we are not allowed to divulge information, especially where it involves the privacy of third parties.

What kind of information is held about you?

- Your name, address, date of birth, telephone number(s), email address
- Copies of any correspondence between yourself and the College, together with any replies (this may include emails as well as letters)
- Copies of any correspondence received about you from educational or church authorities, including, in some cases, references or reports about your progress
- Records of your academic progress, including any notes from tutors
- St Hild contracts and agreements signed by you

St Hild also holds:

- Papers relating to the selection process
- The further personal details you supplied on your initial application form about your family, educational background, and other church/training related data
- Copies of any correspondence received from diocesan authorities (e.g. DDOs, bishops etc.) about you, relating either to initial training and subsequent ministry (and which may sometimes include financial details)
- Records of grants and/or other payments made to you by the diocesan and national church authorities (for example, Ministry Division)
- Copies of any reports received about you from your Local Clergy, Placement Supervisors etc
- Copies of your reports signed by you

Who has supplied this information?

St Hild receives information from:

- You

- Church authorities (DDO, Bishop, Selection Panel, Ministry Division etc.) or other church officers in the Church of England and/or ecumenical partners
- Your incumbent/priest-in-charge/local minister
- Placement supervisors
- University authorities
- Your tutors

For what purposes is this information held?
It is necessary that St Hild hold some information about students in order to function effectively as a teaching organisation. We need to keep records about student progress, how to contact you, and we need to keep university authorities informed of your progress throughout your training.

We are, on occasion, asked to supply references (normally at your request) and we need to have relevant information to hand in order to do this efficiently and accurately. In the case of candidates for public ministry, the Principal is asked to produce full reports for their sponsoring church and it is therefore essential that full and accurate records are kept. We do however recognise that much of this information falls under the heading of 'sensitive personal data' under the terms of the Act, and St Hild therefore takes every reasonable care to maintain a secure and accurate system.

Who has access to this information?
The only people who see all this information is the St Hild core staff. However, other people who may see some of this information include:

- You (e.g. your annual report)
- Your Personal Tutor
- Your church authorities
- Durham University/YTEP (academic matters only)
- Church Revitalisation Trust (CALEB students only)

St Hild operates a clear 'need to know' approach. Information about you will only be provided to people outside St Hild (other than in the circumstances listed above) with your written consent.

Data Protection Policy

The Data Protection Act 1998 is designed to protect the rights of individuals concerning information or personal data held about them. It covers factual information as well as expressions of opinion or judgement and it extends the principles of data protection to paper-based files as well as computer systems.

St Hild is committed to good practice in relation to the eight general principles set out in the Act. Personal data held by St Hild about staff, tutors, governors and students etc should be:

- Fair and lawful
- Used only for specified purposes and that individuals should be told in broad terms what kind of data is held, and for what purposes it will be used
- Adequate, relevant and not excessive in relation to the purposes for which it is held
- Accurate and up-to-date—and therefore periodically reviewed
- Kept for no longer than is deemed necessary
- Subject to individuals' access rights
- Kept securely
- Kept within the European Union unless there is clear assurance of adequate data protection in place.

St Hild is committed to:

- Ensuring that no personal data is given to people outside of St Hild without the consent of the person concerned, except in the case of:

    - Reports on public ministry candidates, which will be circulated only to the authorised personnel in the sponsoring church and those who have a right of access to reports within the current terms of reporting guidelines.

    - Reports on academic progress which may be required by University or other responsible educational authorities.

- Obtaining signed consent from a data subject before any personal information is released to organisations or individuals outside of St Hild, relevant University or sponsoring church authorities.
- Holding, withdrawing and securely disposing of personal files in accordance with the Data and Record Retention Policy of St Hild.
- Using data only for purposes related to the training or study programme in the case of students, or for employment purposes in the case of staff.
- Ensuring that all data subjects are aware of their right of access to information within the limitations of the Data Protection legislation.
- Complying with requests for data subject access as quickly as possible within the 40 day period allowed under the legislation, for which it will charge a standard fee of £10 per data subject access request.
- Taking all such reasonable steps to ensure that all those who supply St Hild with reports, references or other written information or opinion are aware that data subjects will have the right of access to that data.
- Taking care to secure the privacy of all individuals associated with St Hild, including staff, tutors, governors and students.
- Taking all reasonable steps to ensure that data transmitted to tutors, relevant University authorities or sponsoring church authorities through email, the Internet, or any other electronic media is handled securely.
- Ensuring that annual reports, staff appraisals and other sensitive personal data produced in electronic form (but excluding bank details where the individual has given St Hild permission to hold these, and tax details) should not normally be held on a computer, and that electronic forms of data should be securely erased within three months of a reporting process being completed.
- Co-operating fully with the legal authorities in the investigation of any allegation relating to criminal activity, and withholding from data subjects any such information where disclosure may impede a criminal investigation.
- Withholding personal data relating to third parties from data subjects requesting access to information held on file.
- Ensuring that all involved with St Hild are aware of the Data Protection Policy, and that they:
    agree to work within the terms of this policy as a condition of appointment;
    are aware that the data protection policy applies to all personal information held on a data subject.
- Promoting a policy of good practice and informing the Principal or Chair of the St Hild of any serious breach of this policy.

Under the terms of the Act, we are required to act in such a way as to protect the privacy of any third parties mentioned in the personal data. There are other circumstances laid down by the Act which would prevent YMC from making a disclosure. We will always keep those applying for information properly informed and will give reasons for any decisions.

Making a Request for Data

In order that we might respond quickly, you will need to indicate the type of information you

require (if you want access to everything we hold about you, please write 'everything' on the form). However, please also note that we reserve the right, in accordance with section 8(2) of the Act, not to provide you with the information requested if doing so would take 'disproportionate effort'. If you have any queries about this process, please contact the Administrator.

If, when you have received the information, you consider that:

- the information is inaccurate or out of date;
- we should no longer be holding that information;
- the information is being used for a purpose of which you were unaware;
- we may have passed on inaccurate information about you to someone else;

you should immediately contact the Administrator. We will then review the information and may amend your records accordingly. Alternatively, the Principal may contact you, giving reasons as to why he/she believes the information held about you is in fact accurate and relevant and is being held for fair and lawful purposes.

Confidentiality

All those involved within St Hild should be careful to respect appropriate boundaries of confidentiality. It is important that these boundaries are properly set and fully explained in order that people are protected from accidental disclosure of personal information.

Written case studies should not include personal details of other people in a way that makes such people identifiable.

Limits of confidentiality between staff and students include the core staff team as a whole. Confidentiality is held *within the staff team*, not with individual staff members. Each student has access to all assessments and gradings that relate to them and their study.

Responsibility for implementation

The St Hild Principal is the Compliance Officer responsible for maintaining and implementing the St Hild Data Protection Policy.

Last Review Date: May 2018

Last Revision Date: May 2018

Reviewed By: St Hild Resources Committee and Council

APPENDIX 1 to the Data Protection Policy

Standard Request Form for Access to Data

I, (insert name) wish to have access to either (delete as appropriate)

1. All the data that the College currently has about me, either as part of an automated system or part of a relevant filing system: or

2. Data that the College has about me in the following categories:

- Academic marks or course work details
- Academic or employment references
- Disciplinary records
- Health and medical matters
- Political, religious or trade union information
- Any statements of opinion about my abilities or performance
- Personal details including name, address, date of birth etc.
- Other information

(Please highlight as appropriate)

I understand that this will incur a fee of £10.00

Signed_____

Dated_____