



Wycliffe

## DATA PROTECTION POLICY

### 1 GENERAL STATEMENT OF WYCLIFFE'S DUTIES

Wycliffe is required to process relevant personal data regarding all employees as part of its operation and shall take all reasonable steps to do so in accordance with this Policy.

### 2 DATA PROTECTION CONTROLLER

Wycliffe has appointed a Data Protection Controller ("DPC") who will endeavour to ensure that all personal data are processed in compliance with this Policy and the Principles of the *Data Protection Act 1998*. The DPC will be the Bursar.

### 3 THE PRINCIPLES

Wycliffe shall, so far as is reasonably practicable, comply with the Data Protection Principles ("the Principles") contained in the *Data Protection Act* to ensure all data are:-

- Fairly and lawfully processed;
- Processed for a lawful purpose;
- Adequate, relevant and not excessive;
- Accurate and up-to-date;
- Not kept for longer than necessary;
- Processed in accordance with the data subject's rights;
- Secure;
- Not transferred to other countries without adequate protection.

### 4 PERSONAL DATA

Personal data cover both facts and opinions about an individual. It includes information necessary for employment such as the employee's name and address and details for payment of salary.

### 5 PROCESSING OF PERSONAL DATA

An employee's consent may be required for the processing of personal data unless processing is necessary for the performance of the contract of employment. Any information which falls under the definition of personal data and are not otherwise exempt, will remain confidential and will only be disclosed to third parties with the consent of the employee.

### 6 SENSITIVE PERSONAL DATA

Wycliffe may, from time to time, be required to process sensitive personal data regarding an employee. Sensitive personal data include medical information and data relating to religion, race, trade union membership and criminal records and proceedings. Where sensitive personal data are processed by Wycliffe, the explicit consent of the employee will generally be required in writing.

7 **RIGHTS OF ACCESS TO INFORMATION**

Employees have a right of access to personal information (within the meaning of the Act) which is held by Wycliffe. Any employee wishing to access their personal data should put their request in writing to the DPC. Wycliffe will endeavour to respond to any such written requests as soon as is reasonably practicable and in any event, within 40 days for access to records and 21 days to provide a reply to an access to information request. The information will be imparted to the employee as soon as is reasonably possible after it has come to Wycliffe's attention.

8 **EXEMPTIONS**

Certain data are exempted from the provisions of the *Data Protection Act* which includes the following:

- The prevention or detection of crime;
- The assessment of any tax or duty;
- Where the processing is necessary to exercise a right or obligation conferred or imposed by law upon Wycliffe.

The above are examples only of some of the exemptions under the Act. Any further information on exemptions should be sought from the DPC.

9 **ACCURACY**

Wycliffe will endeavour to ensure that all personal data held in relation to employees are accurate. Employees must notify the DPC of any changes to information held about them. An employee has the right to request that inaccurate information about them is erased.

10 **ENFORCEMENT**

If an employee believes that Wycliffe has not complied with this Policy or acted otherwise than in accordance with the *Data Protection Act*, the employee should utilise Wycliffe's grievance procedure and should also notify the DPC.

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