Data Protection Policy

Department	Governance, Policy and Compliance
Team	Data Protection and Information Compliance
Type	University/Policy and Procedure
Authority	VCEG and ARAC
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This policy is concerned with safeguarding the personal data processed by the University of London and ensuring the University of London processes personal data in accordance with relevant data protection legislation.

The University of London collects, stores and processes the personal data of living individuals such as current, past and prospective staff; students; applicants; alumni; contractors; research subjects; and customers. It uses this data to carry out its functions. This processing is regulated by data protection law including the UK General Data Protection Regulation (UKGDPR), Data Protection Act 2018, Data (Use and Access) Act 2025, and e-privacy legislation. Where data of individuals from other countries is processed, the University of London may also be required to comply with the data protection law of that country.

The University of London takes the protection of all personal data extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal data. The University of London commits to ensuring personal data is handled lawfully and in accordance with this policy.

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What is the University's Policy on Data Protection?

1.1 The University of London collects, stores and processes the personal data of living individuals such as current, past or prospective staff; students; applicants; alumni; contractors; research subjects; and customers.

It uses this data to carry out its functions. This processing is regulated by data protection law including the UK General Data Protection Regulation (UKGDPR), Data Protection Act 2018, Data (Use and Access) Act 2025 and e-privacy legislation. Where data of individuals from other countries is processed, the University of London may also be required to comply with the data protection law of that country. The University of London also needs to comply with related e-privacy law such as the Privacy and Electronic Communications Regulations.

1.2 The University of London takes the protection of all personal data extremely seriously and is committed to a policy of protecting the rights and freedoms of individuals with respect to the processing of their personal data. The University of London commits to ensuring personal data is handled lawfully and in accordance with this policy.

1.3 The purpose of this policy is to enable all members of the University to understand their responsibilities when they process personal data to ensure personal data is processed in compliance with data protection law.

1.4 Compliance with this Data Protection policy is compulsory for all members of the University. Failure to adhere to the policy may constitute a disciplinary offence.

1.5 This policy forms part of the University's broad framework of policies and guidance documents. The University of London's Data Protection policy should be read in conjunction with related University core policies and guidance documents. These include:

- Data Governance Policy
- Data Classification Policy
- Information Security Policy
- Research Ethics Policy and Procedure
- Artificial Intelligence Policy.

Who and what does this policy apply to?

1.6 This policy applies to all staff and students when processing personal data on behalf of the University of London. 'Staff' includes any individual conducting work for the University of London and/or subsidiaries. This includes temporary, honorary, visiting, casual and agency workers, contractors, fellows, students employed by the University and any associated personnel acting as representatives of the University.

1.7 This policy applies to all personal data processed by the University of London regardless of where the processing is carried out or where the data is held.

What is personal data?

1.8 **Personal data** is any information or data relating to an identified or identifiable living person who can be identified, directly or indirectly, from that information or data. This includes identifiers such as name, ID number, location data and also statistical information from which an individual's identity can be derived.

1.9 **'Processing'** data is widely defined and includes all plausible activities that could be taken in relation to data such as collecting, recording, storing, using, analysing, combining, sharing, disclosing, erasing and destroying it.

4. What principles does the University follow?

4.1 The University of London will follow these core principles when processing personal data:

- **Lawfulness, Fairness and Transparency:** we collect and use personal data legally and transparently in relation to the data subject and ensure appropriate legal bases have been identified for all forms of processing of personal data.
- **Purpose Limitation:** we only collect and use personal data for specific, explicit and legitimate purposes and do not further process that data in a way that is incompatible with those purposes.
- **Data minimisation:** we collect and use only the personal data that we need to meet the purposes for which we collected it
- **Accuracy:** we keep personal data up to date and ensure its accuracy by correcting errors promptly
- **Storage Limitation:** we keep personal data in a way that identifies data subjects only for as long as is necessary
- **Integrity and confidentiality:** we appropriately protect personal data from unauthorised access, loss or damage.

4.2 The University of London will take a 'data protection by design and default' approach and ensure that data protection consideration is incorporated into systems and processes from the outset, including embedding Data Protection Impact Assessment (DPIA) completion as a key part of process and activity planning.

4.3 The University of London will only transfer personal data outside of the UK where there is adequate protection in place and will follow all requirements of the UK regulator (Information Commissioner).

4.4 The University will uphold the rights of individuals in data protection law.

4.5 The University will uphold the right of Transparency in data protection law and will ensure that all forms of processing of personal data are included within a Privacy Notice.

4.6 The University will maintain a Record of Processing Activities as required by the UK Regulator.

4.7 The University will ensure that all processing of personal data by other organisations with whom it has shared data is governed by appropriate sharing and processing agreements.

4.8 The University will ensure that all personal data it processes has a designated Data Steward who works with the Data Protection team to disseminate guidance and information relating to data protection and good information handling practices as well maintaining the appropriate registers to demonstrate accountability in relation to data protection.

Who is responsible for what?

4.9 **All staff and students** are responsible for:

- Following this policy and any implementation guidance or related data handling guidance
- Ensuring the processing of personal data (including within research) is compatible with data protection law and this policy
- Raising any concerns in relation to the processing of personal data with the DPO
- Successfully completing relevant data protection training

4.10 **Academic and academic related staff** are responsible for the conduct in data protection matters of the students they supervise

4.11 **Data Stewards and Data Custodians** who act as the nominated 'trustee' of assigned data on behalf of their department and the University are responsible for ensuring data protection compliance in relation to their areas as set out in the Data Governance Policy

4.12 **Heads of Department/ Senior Managers** are responsible for ensuring their staff understand the data protection principles and comply with data protection law and this policy

4.13 **The Data Protection Officer** (DPO) is the University's advisor and assessor on data protection matters and the main point of liaison for external organisations and regulators for data protection issues. They are responsible for overseeing data protection compliance matters relating to the University of London. Additional responsibilities of the DPO are set out in the Data Governance Policy.

4.14 **Vice Chancellor's Executive Group** (VCEG) is accountable for approving and supporting the Data Protection policy; ensuring the proper implementation of the policy across the University; and ensuring adequate resources are available to enact the requirements of this policy.

When should I seek advice before processing personal data?

4.15   You should seek advice from the Data Protection team when:
- you are procuring new software or systems that will contain or process personal data
- you intend to use additional personal data in an existing software/system
- you are sharing personal data with other organisations or individuals outside the University of London – such as sharing with partners or collaborators, cloud services, responding to enquiries from police or other third parties
- you intend to change the way you process personal data – such as repurposing existing data, analysing it in a new way, using personal data in AI tools.