

Release of Public Information

Policy and Protocol for Security

Important information regarding this document

The overarching responsibility, oversight and review for the policy and protocol in relation to the response to and prevention of admissions fraud lies with the Director of Student and Academic Services, University of London.

This Protocol was approved by the University of London's Senior Leadership Team (SLT) on 23 March 2021, and took effect from 1 April 2021. This version of the document supersedes any previous versions.

Equality Impact Assessment

A departmental assessment affirms this policy as neutral in terms of equality-related issues.

This document is protected under the University of London copyright.

TABLE OF CONTENTS

INTRODUCTION AND POLICY OVERVIEW.....	1
SCOPE AND STAKEHOLDERS.....	1-2
PRINCIPLES.....	2-3
PROTOCOL FOR MANAGING DATA RELEASE REQUESTS.....	3-4
Evidence of consent from the student/graduate	3-4
Release of data to the Police.....	4
Release of data about a deceased student/graduate.....	4
GOOD PRACTICE FOR ENSURING THE SECURITY OF RECORDS.....	5
FURTHER REFERENCE.....	5



INTRODUCTION AND POLICY OVERVIEW

1. The University of London (UoL) holds a rich repository of student and graduate records. These include registration records and records of awards. The Director of Student and Academic Services is accountable for the records and the Head of Transcripts and Student Records has operational oversight of these records.
2. Up until 1989, UoL held all registration records centrally. From 1990, member institutions started to hold records of their respective student registrations. This means that UoL Worldwide can provide verification of UoL awards from 1990 onwards. In addition, UoL has a central record of awards from 1936 onwards. Records before 1936 are available in the Senate House Library archive and accessible to the public through an online database.
3. UoL uses its student and graduate records for the purpose of verification of student registration and graduate achievement in qualifications fraud investigations. In addition, UoL may use student and graduate records to respond to requests for release of data about individuals to organisations, the media and third-party individuals. UoL takes a cautious approach to the release of such data and academic profiles of its students and alumni, who can include public figures.
4. The purpose of this policy and protocol is to ensure that:
 - The records held by UoL are secure.
 - UoL releases public information only under appropriate circumstances, with approval of all such requests by the **Director of Student and Academic Services/group of designated officers**.
5. In producing this document, UoL Worldwide consulted sector and regulatory guidance on data privacy, including the General Data Protection Regulation (GDPR) and the Common Law Duty of Confidentiality. In addition, cases previously handled by the University and other HE case studies have informed relevant aspects of the protocol.

SCOPE AND STAKEHOLDERS

6. UoL receives requests for release of information contained within its student and graduate records from various third-party stakeholders, which can include:
 - Individuals (e.g. family members of a graduate, recognised teaching centre personnel)
 - Media organisations (e.g. for data regarding a public figure)
 - Employers (e.g. for verification of information about job applicants)
 - Other universities (e.g. for verification of qualifications of applicants)



- Government bodies (e.g. the police to request information about a UoL student/graduate potentially associated with UoL)
7. UoL teams that are likely to receive requests for public information include:
- UoL Worldwide: Admissions, Registry, Diploma and Transcripts, Marketing, Public Relations
 - The VC's Office: Development Office, Legal Services, HR, Communications
 - Senate House Library
8. The **Director of Student and Academic Services/group of designated officers** approves the release of information contained within UoL's student and graduate records. If necessary, the Director of Student and Academic Services would consult the Pro-Vice Chancellor (International) and agree the appropriate action.

PRINCIPLES

9. UoL does not provide any information on a student's or a graduate's academic record without the consent of the student/graduate.
10. The exceptions to this rule are:
- Those cases where a government agency, or similar, formally requests such information in relation to legal or statutory proceedings, where confirmation of the academic record is required.
 - Those cases where UoL deems that such information should be provided in relation to the interests of the public; where to withhold such information could be detrimental to the student, to the interest of the public, and to the reputation and standards of the university.
 - For example, the University's Data Protection guidelines state that the following factors may add weight to legitimate interests of the University or a third party in the University disclosing information, such as verifying a qualification, to the press:
 - *Has the student/graduate has made public claims (on a website, in an interview) about qualifications received from the University?*
 - *Is the graduate a public figure (for e.g. in government) who has made claims about qualifications received from the University?*
 - *Is the qualification a doctorate, where the standard outcome is that the thesis goes into the Library (and is therefore generally accessible via an online catalogue)?*



- *Is the graduate practicing medicine, and has made claims about qualifications received from the University?*
- *Is there a risk that the University not confirming may help perpetuate a fraudulent claim or declaration?*

PROTOCOL FOR MANAGING DATA RELEASE REQUESTS

11. UoL deals with requests for release of data on a case-by-case basis.
12. The UoL officer {e.g. Admissions, Development Office, Marketing, Communications} (see section 7) contacts the Head of Transcripts and Student Records with a description of the request for data release.
13. The Head of Transcripts and Student Records checks the data requests for GDPR compliance. If need be, UoL's Data Protection and Information Compliance Manager and/or the Director of Communications are also consulted.
14. Some cases have a potential high reputational impact for UoL or require exceptional handling, for example requests that involve a public figure, requests involving law enforcement bodies (see sections 19-20) and requests of data about a deceased student/graduate (See section 21-22). The Head of Transcripts and Student Records discusses such cases with the Director of Student and Academic Services for advice and confirmation of next steps. The Director of Student and Academic Services may confer with UoL's Data Protection and Information Compliance Manager, PR, Communications, Director of Operations, Pro-Vice Chancellor (International), the Vice Chancellor and/or other UoL officers where necessary, to agree the appropriate action.
15. The request for the release of data about a student/graduate may be denied where UoL deems that providing such information could be detrimental to the interest of the public or to the reputation and standards of the university. The final decision on release of information to third parties lies with the **Director of Student and Academic Services/group of designated officers**, or in exceptional cases, with the Pro-Vice Chancellor (International).

Evidence of consent from the student/graduate

16. The Head of Transcripts and Student Records checks whether the student/graduate has given explicit consent for the release of their information to the third-party individual or organisation.



17. If there is evidence of consent of data release from the student/graduate to the specified third party individual/organisation:
- The Head of Transcripts and Student Records will release the information to the third-party individual or organisation.
 - The Head of Transcripts and Student Records will register the request for the data request for future reference.
18. If there is no evidence of consent of data release from the student/graduate to the specified third party individual/organisation:
- The Head of Transcripts and Student Records will ask the third-party individual or organisation to ask the student/graduate to confirm in writing that they permit the third-party individual or organisation to have access to the information from UoL.
 - The third-party organisation/individual will need to provide appropriate evidence of confirmation from the student/graduate to the Head of Transcripts and Student Records to receive the requested data.
 - The Head of Transcripts and Student Records will inform the UoL officer as may be required, and register the request for the data for future reference.

Release of data to the police

19. To enable the Head of Transcripts and Student Records to release data to the police, the police needs to provide a statement for detection and prevention of crime.
20. If necessary, the Director of Student and Academic Services and/or the Head of Transcripts and Student Records will provide a statement on behalf of UoL in writing or at a Tribunal to support the data UoL releases.

Release of data about a deceased student/graduate

21. Information about a deceased person does not constitute personal data and is not subject to the GDPR. However, the data about deceased students/graduates held by the University is subject to the Common Law Duty of Confidentiality.
22. In general, UoL uses 80 years from graduation as an indicative length of time when a graduate may be deceased, unless evidence to the contrary is available. The individual or organisation requesting data about a student or graduate who has deceased needs to provide to the Head of Transcripts and Student Records:
- i. Independent evidence of the death of the student/graduate. This can be a death certificate or trusted media source (e.g. an obituary or a news story).
 - ii. Evidence of relationship to the individual
 - iii. A statement on the purpose of their request for the data.



GOOD PRACTICE FOR ENSURING THE SECURITY OF RECORDS

23. The Head of Transcripts and Student Records manages all data release requests in accordance with UoL's statutes, policies and regulatory requirements.
24. The final decision on provision of data to third parties lies with the ***Director of Student and Academic Services/group of designated*** (see sections 14-15 above).
25. The Head of Transcripts and Student Records registers the case outline and outcome for future case reference.
26. The Head of Transcripts and Student Records communicates policy update requirements to the Senior Project Manager: Student Services, who records the lessons learnt and maintains an up-to-date policy and protocol for the security of data and release of public information.

FURTHER REFERENCE

Guide to the General Data Protection Regulation (GDPR), Information Commissioner's Office (ICO)

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>