

## **SCOT Chapter 7 Student personal data: capture, retention and disposal V.1**

### **1. Introduction**

1.1. The Institute is committed to ensuring that the personal information of all students is handled in accordance with the principles of current DMU Data Protection legislation, (including the General Data Protection Regulation and the Data Protection Act 2018, UK). Students' personal data is held for the purposes set out in full in the Institute's Privacy Notice. These purposes include:

1.1.1. Maintenance of a student's record (including personal and academic information)

1.1.2. Management of academic processes (including teaching, assessment and the conferment of awards)

1.1.3. Provision of support

1.1.4. Management of University owned and sourced halls of residence

1.1.5. Management of disciplinary processes.

### **2. Disclosure of examination and assessment results to students**

2.1. This section sets out the agreed policy on the disclosure of examination and assessment results to students. The Code of Practice below satisfies the legal requirements for the disclosure of information under current Data Protection legislation.

2.1.1. The SCOT treats examination and assessment results with strict confidentiality. Results are communicated to students on an individual basis.

2.1.2. The SCOT will confirm to each student the results which s/he has been awarded in respect of each individual assessment.

2.1.3. The assessment and grading of student performance, and decisions about intermediate and final awards, are the responsibility of the relevant Assessment Boards.

2.1.4. The results awarded to students for each individual assessment will be determined in accordance with the SCOT and subject regulations.

- 2.1.5. As soon as possible after Assessment Board meetings, candidates will be informed of the final results which they have achieved in individual assessments.
- 2.1.6. The notification of examination results to students does not imply any element of negotiability regarding those results, nor is it related to the formal procedures which exist for the review of Assessment Board decisions. Staff must not discuss with students the proceedings of Assessment Boards.
- 2.1.7. Except for data determined and stored from previous Assessment Board meetings, no final examination or assessment results should be subject to automated data storage. No 'new' final examination or assessment results should be placed on a machine automated file prior to 40 days before the date on which an Assessment Board is to consider such assessment.
- 2.1.8. By making final stage results available to candidates under the standard procedures set out above, the SCOT would expect to minimise requests on other occasions for access to machine stored data. Adherence to the directions of the Board of Examinations information available to individuals through such applications will only be that which has been formally considered and presented to an Assessment Board.
- 2.1.9. Applications by data subjects for access to machine-stored data otherwise than under the standard procedures set out will be dealt with as they arise.. A person may only apply for access to his or her own examination data. Applications must be made in writing to the Registrar, signed by the applicant. The Registrar will keep a record of such applications.

### **3. Disclosure of information about students**

- 3.1. The disclosure of any personal information about students is subject to the requirements of current DMU Data Protection legislation where applicable.
- 3.2. All requests from outside the SCOT for disclosure of information about current or former students should be considered in the light of the following guidance. In considering such requests, members of the Institute should observe the general principle that information relating to an identifiable individual must not be disclosed without the consent of the individual concerned.

- 3.3. Requests for information about individuals must be made in accordance with current DMU Data Protection legislation and addressed to the SCOT Registrar.
- 3.4. Requests for information made in accordance with the Freedom of Information Act must be addressed to the Registrar.
- 3.5. The SCOT will disclose certain information, including details of attendance and academic progress, to the sponsor(s) of a student where such disclosure is a specific condition of the sponsorship. The SCOT will disclose information of a specified kind, upon verification of identity, to a representative who has been named by a student to act on their behalf.
- 3.6. The Institute may undertake to make reasonable attempts to pass on information from a third party to a student.
- 3.7. The Institute will not accede to requests for personal data about groups or categories of students where individual students might be identified unless it is able to secure the consent of each individual student concerned.
- 3.8. Students who have successfully completed their programmes of study are usually eligible to attend graduation ceremonies or similar public events. Graduation brochures, and other material associated with such events, may contain lists of students who have achieved degrees and other academic awards.
- 3.9. In cases of any doubt, advice should be obtained from the SCOT Registrar.

#### **4. Policy on image capture**

- 4.1. The DMU Data Protection legislation regulating the use of all personal information, including physical, physiological or genetic characteristics. This means that photographs of individuals where the individual can be identified fall within the scope of Data Protection legislation and are therefore subject to data protection principles.
- 4.2. From time to time the Institute may arrange for photographs (including video photography) to be taken which may include individual subjects or groups of individuals depending on the particular circumstances.
- 4.3. The photographs taken by the Institute may be used for promotional, marketing, training, teaching or assessment purposes. These may include (but are not limited to) the production of printed materials such as the Student Handbook, brochures, the posting of photographs on the SCOT website or the use of video

photography in television advertising.

- 4.4. The legal basis for this use is Legitimate Interests. Any student who has objections to their image being captured should inform the Institute's Registrar. It should be noted that where a student is present within a picture where they are not the primary subject (for example where they are in an audience or crowd) then they do not normally have the right of erasure. Where they are clearly the central figure in a photograph they can object to said processing and request erasure.

## 5. **Retention and disposal of student records**

- 5.1. All records kept by the Institute are held in accordance with the Records Retention Policy held by the Registrar and available on the Institute website. Most records with regard to students are retained for a minimum of six years after graduation, termination or withdrawal from the Institute. Records may be kept longer than this minimum if there is a legitimate and reasonable business need for the University to keep such records.
- 5.2. If, after six years, a student's record is destroyed, the individual student's final transcript and assessment board minutes will be retained to enable the SCOT to verify a student's achievements.