University of Dundee

Information Governance – Data Protection

Standard Operating Procedure – Requests for personal information from external agencies

1. **Scope**

1.1 This procedure details the process to be followed by the University where any external agency (including, but not limited to, the Police, Local Government, Electoral Registration Officers, Health and Social Care agencies, UKVI, HMRC etc) request personal information from the University pertaining to its students, staff or other stakeholders.

1.2 The University will only disclose information to third party agencies where it is satisfied that is appropriate to do so. This procedure provides a framework for that process.

1.3 This procedure is applicable to all claims on personal information from external agencies, however where claims are recurring, for example from Local Government, further procedures may be established and agreed under this framework and managed on an ongoing basis by Schools, Directorates or Units.

2. **Responsibilities**

2.1 The Secretary of the University is responsible for institutional compliance with information legislation.

2.2 The Director of LLC&CI and the Head of Information Governance are responsible for this procedure.

2.3 Deans and Directors are responsible for the implementation of this procedure in their areas.

3. **Procedure**

3.1 Where an external agency requests personal data from the University, the University will require **written confirmation of that claim**. This confirmation must include:

3.1.1 The authority for the claim in reference to any applicable Acts, Regulations or other frameworks.

3.1.2 Any applicable case number or file reference (where applicable).

3.1.3 An explanation of the purposes of the claim on the information.

3.1.4 In the case of requests from the Police or other similar authority, a completed pro-forma which is counter-signed by a senior officer and includes the information above.
3.2 Any non-urgent request for information of this type should be referred Information Governance. They will review the claim to assess its appropriateness. This includes:

3.2.1 Reviewing the authority for the claim on the information in reference to any Acts, Regulations or mandates cited by the agency.

3.2.2 Reviewing the supporting information provided by the agency.

3.2.3 Ensuring that all applicable aspects of the claim (such as reference numbers, counter-signatures etc) have been provided.

3.3 Please note that urgent requests, for example concerning the preservation of life, may be managed directly, normally by Precinct Services according to their procedures.

3.4 Where disclosure is considered appropriate IG will agree a process for disclosure. This may include:

3.4.1 Agreeing methodologies for the secure transfer of the data between the section of the University which holds it and the agency claiming the information (with the support of UoDIT).

3.4.2 Agreeing the scope of any disclosure of data in respect of its limitation to the purposes agreed with the agency, its retention and its disposition.

3.4.3 Checking the identity of the person making the request prior to any disclosure (for example by calling the agency on a general telephone number and confirming contact details, the role and status of the agency’s official etc).

3.4 Where disclosure is not considered appropriate, IG will:

3.4.1 Provide written confirmation to the agency that the University does not believe disclosure is appropriate.

3.4.2 Discuss the request with the agency to establish whether any additional information would ensure the appropriateness of the claim.

3.4.3 Undertake to review any additional information per the process detailed above.

Useful contacts

- Alan Bell, Head of Information Governance x84441
- Richard Parsons, Director LL&C&CI x84082
### Change control

<table>
<thead>
<tr>
<th>Change</th>
<th>Date</th>
<th>Authority</th>
</tr>
</thead>
<tbody>
<tr>
<td>Draft</td>
<td>19 October 2016</td>
<td>Head of Information Governance</td>
</tr>
<tr>
<td>Consultation with Data, Records and Information Committee.</td>
<td>March 2018</td>
<td></td>
</tr>
<tr>
<td>Publication</td>
<td>May 2018</td>
<td></td>
</tr>
</tbody>
</table>