



UKBC Data Handling Policy

September 2024

Version 1.0
Approved by the Board of Governors

1. Purpose

This policy sets out the procedures for requesting, accessing, and sharing institutional data at UKBC. It ensures that data handling is secure, compliant with legal and regulatory frameworks (including UK GDPR), and aligned with the strategic governance of the college.

2. Scope

This policy applies to:

- All staff and departments within the institution
- Contractors or third parties who require access to data
- External organisations or regulators requesting institutional data

It covers all forms of data, including but not limited to student records, academic performance and enrolment figures

3. Governance and Custodianship

- The **Registry Department** is the official custodian of institutional data.
- All data requests **internal or external** must be submitted to the Registry to ensure proper authorisation, secure access, and a clear audit trail.
- The Registry is responsible for maintaining records of data requests, managing permissions, and ensuring adherence to statutory obligations and internal policies.

4. Submitting a Data Request

All data access, extraction, or sharing requests must:

- Be submitted to the official Registry request process via email at registry@ukbusinesscollege.org
- Clearly state:
 - **Purpose of the data use** (e.g. quality assurance, HESA return, curriculum planning)
 - **Scope of data requested** (specific fields, cohorts, timeframes)
 - **Recipients of the data** (internal teams or third-party organisations)
 - **Required deadline** for data delivery

Standard Turnaround Time:

- Requests will be processed within **2 working days**, subject to complexity, data sensitivity, and required approvals
- More complex or large-scale requests may take longer, with updates provided to the requester

5. Data Access Rights

Access to institutional data is granted strictly on a **need-to-know** basis, determined by:

- The individual's role and responsibilities
- The nature and sensitivity of the data
- The purpose for which access is required

Only staff who require specific data to carry out their duties will be granted access to that data.

5.2 Principles of Access Control

Data access will be managed according to the following principles:

- **Least privilege:** Users are granted the minimum access necessary
- **Data minimisation:** Only the data required for the specified purpose will be shared
- **Time-bound access:** Temporary access may be granted for specific tasks or projects, with automatic expiration where appropriate

5.3 Granting and Revoking Access

- Access is granted by the Registry upon formal request and, where required, with approval from a senior manager or data owner
- Access will be reviewed regularly to ensure it remains appropriate
- Access is revoked:
 - Upon role change or termination of employment
 - If the purpose for access is no longer valid
 - In the event of a breach of data policy or misuse of data

5.4 Confidentiality and Training

- All users must adhere to confidentiality agreements and are expected to report any data breaches immediately
- Misuse of data may lead to disciplinary action under the institution's HR policies

6. Data Security and Compliance

- All data must be handled in compliance with:
 - UK General Data Protection Regulation
 - Data Protection Act 2018
 - Relevant OfS or HESA reporting requirements
- Data must not be stored or shared using unauthorised or unsecured platforms

- All data transfers must be documented and, where applicable, encrypted or anonymised

7. Monitoring and Enforcement

- Breaches of this policy may result in disciplinary action in accordance with college HR procedures
- The Registry maintains logs of all data releases for auditing and compliance purposes

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