

Document Title	Code of Practice 5: Disclosure of information
Version	02/12/20
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Owning Department	Vice-Chancellor's Office
Approval Date	02/12/20
Review Date	31/12/22
Approving Body	Information Assurance and Security Committee
Relevant to	All academic and professional services staff

All information which University of Greenwich staff holds and processes should be disclosed in accordance with Freedom of Information and Data Protection rules.

1. Staff responding to requests for information

- All requests for information which members of staff receive, regardless of who they are from, should be dealt with promptly or forwarded to the correct person or department to deal with
- The University of Greenwich as a public authority is subject to the Freedom of Information Act (FOIA); and as an institution which collects and processes personal information, to Data Protection legislation
- Staff should continue to deal with routine requests for information as normal
- Requesters can be asked to put their request in writing (including email), and can and should be asked for clarification if their request is not understood
- Requesters should provide their name and contact details
- Information which the University does not hold cannot be provided to enquirers
- The University has Records Coordinators who are staff responsible for coordinating FOIA and DPA requests within their faculty or directorate
- Non-routine and formal requests can be made to compliance@gre.ac.uk

2. Disclosing their own personal data to current students

- Staff should continue to routinely disclose current students' own personal data to them (such as marks, feedback, financial information etc.), but should:
 - Verify to their own satisfaction the student's identity
 - This may mean asking for the request to be sent by email, or checking an ID in person
 - This may mean not providing information over the phone, if ID cannot be verified
 - Ensure that personal data about a third party is not also being disclosed. Personal data should not be disclosed in any case where information about another third party cannot be protected (without the consent of that individual). The information should not be revealed if it is not reasonable to do so. If third party identity can be made anonymous, it should be

- Students must be given their grades / exam marks, even if they are in financial arrears. This should be on plain, not headed paper. A fee can be charged. Exam scripts will not be disclosed, as they are exempt
- Exam results lists should not be publicly disclosed
- Non-routine and formal requests from current students for their own personal data can be referred to Compliance as Subject Access Requests

3. Disclosing their own personal data to past students / alumni

- Routine requests for transcripts, duplicate certificates, confirmations of award etc. will be dealt with by the Conferments department. A fee may be charged
- Non-routine and formal requests from past students can be referred to Compliance as Subject Access Requests

4. Disclosing third party personal data to University of Greenwich members of staff

- Staff members are entitled to receive third party personal data about students or staff if they require the information in order to perform their official duties, or with the consent of the individual concerned

5. Disclosing third party personal data to family, friends or associates

- Third party data will not be disclosed to family or friends, or other guardians or associates, without the written consent of the individual concerned

6. Disclosing third party personal data to bodies which might be to the student's advantage e.g. pension authority, local authority for child or other benefits etc., potential employers or agencies

- Requests should be received in writing (including email). Telephone callers should be requested to make a written enquiry
- Enough identifying details about the student should be obtained e.g. full name, date of birth, programme of study
- Verify the enquiring body's contact details (e.g. check letterhead, email address, website)
- Staff who have satisfied themselves of the above can disclose
- If a request for a reference, see also Code of Practice 3
 - The Conferments department can provide standard factual references for students and past students

7. Providing confirmation of student academic achievements to e.g. potential employers, recruitment agencies, verification, authentication or investigative agencies, or other educational establishments

- Requests should be received in writing (including email). Telephone callers should be requested to make a written enquiry
- Enough identifying details about the student should be obtained e.g. full name, date of birth, programme of study
- Verify the enquiring body's contact details (e.g. check letterhead, email address, website)
- Staff who have satisfied themselves of the above can disclose

- This disclosure can include the fact that there is no record of the student, if this is the case
- This disclosure can include the fact that the academic achievements are false, if this is the case
- The Conferments department can provide responses to these requests

8. Disclosing third party personal data to investigating bodies for the purposes of preventing or detecting crime or apprehending or prosecuting offenders e.g. the police, government bodies such as immigration, local authorities investigating fraud

- Requests should be received in writing (including email). Telephone callers should be requested to make a written enquiry. The University has a third party personal information request form which such enquirers can complete
- A decision will be made based on the information provided by the enquirer whether it is correct to disclose the information requested. This decision is based on:
 - The reasons provided by the enquirer for requesting the information
 - The crime for which the individual is being investigated
 - The rights of the individual concerned
 - Whether the enquirer could get the information from another source
 - Whether the University considers disclosure to be necessary and proportionate
 - Whether the body has proper prosecuting or statutory powers
- The University is not required by law to provide third party personal data without the consent of the individual concerned, unless a court order has been issued
- Therefore University staff do not have to, and should not, provide personal information immediately on request, even to the police
- Police visiting the University in person will be asked to make their request in writing, using the form mentioned
- Third party personal information will not be disclosed to private organisations such as banks or other financial institutions, or solicitors (without consent)

9. Dealing with post and email during absences

- Members of staff should implement out of office procedures during absences of longer than three working days (or less if processes are already in place in their local area of work)
- Post should be dealt with by a colleague when staff are absent for longer than three working days (or less if processes are already in place in their local area of work)
- Email should be dealt with by one of the following means:
 - Activate the automatic reply facility, suggesting an alternative name for contact e.g. "I am out of the office until [date], and will respond to you if necessary on my return. If your message is urgent, please redirect your email to name@greenwich.ac.uk", or
 - Make arrangements for colleagues to deal with email, or
 - Make arrangements for picking up email remotely
- Don't forget to suspend any email discussion lists that you belong to
- If colleagues are dealing with your email, and you prefer that they do not read personal messages, you should direct your correspondents to place "Personal" or "Private" in the subject box. Similarly, post which is marked "Private & Confidential" will not be opened.