

DLL Student Data and Confidentiality Policy

This policy sets out how students' personal data should be managed and shared within and beyond DLL, in accordance with University of Sheffield policy, the Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

Personal data

Any data relating to an individual person is covered by GDPR. Some forms of data are classed as 'Special Category' data and more stringent rules apply (see below).

Personal data that is not Special Category data

Within DLL this is likely to relate to things like students' contact details, academic record etc - data which does not fall within the special categories, but is clearly confidential. This can be shared without explicit consent **within the department and within the University** as necessary in relation to the student's studies but should not be used for any other purposes.

Responding to external enquiries

Students' personal data must NOT be shared by DLL staff with anyone outside the University of Sheffield. This includes parents, spouses or other relatives, and the police or other authorities. If you receive an external enquiry about a student **you must not give out any information about them and should not even confirm that they are a student**. If the enquirer persists, or if they represent an official body, they should be referred to Student Services: 0114 2224321.

Providing references

References, including UCAS references, will often ask for personal data, including a student's academic record. A reference request from UCAS will already have the student's consent. If you receive any other reference request, you should ask the student to confirm that they have consented to you providing it before responding.

Sharing data with students

Students' personal data, including University of Sheffield email addresses, should not normally be shared with other students. There may be exceptions to support a particular aspect of their studies - for example, limited sharing of email addresses to set up groups for a groupwork assessment. Please contact the DLL Information Champion (currently s.hale@sheffield.ac.uk) to discuss any potential exceptions **before** sharing any data.

Special Category Data

The rules for handling Special Category data are more stringent, and can be thought of in terms of specific people who it **can** be shared with, rather than who it can't be.

Special Category data includes ALL the following:

- race
- ethnic origin
- political opinions

- religious or philosophical beliefs
- trade union membership
- genetic data
- biometric data (where this is used for identification purposes)
- health data
- sex life
- sexual orientation
- criminal convictions (treated in the same way as Special Category data)

The type of Special Category data most likely to be relevant to DLL's day to day business is that relating to health, including mental health. The University has (in October 2022) issued a [Code of Practice](#) on sharing mental health and wellbeing information - it is important to note however that this is aimed primarily at clinical and support services rather than departments. The following policy and guidance is consistent with the code of practice.

Special Category data may only be shared with specified individuals within DLL, and only as many of these as necessary. These will normally be:

- Head of Department
- Student Support Manager
- Senior Student Support and Welfare Officers - usually the one allocated to the student
- Programme Directors - usually the one allocated to the student
- The student's Personal Tutor

Information may be shared further with the student's explicit written consent, but such consent should not be solicited from the student, and should be exercised with regard for the student's wellbeing.

If the student has voluntarily shared information with a number of people, those people may discuss it but should not share it further except as set out above.

Personal Tutors

A Personal Tutor who receives any significant personal or health information from a student should share it with one of the people specified above - usually the student's SSWO. Personal Tutors should not be the sole person holding such information and should make it clear to students that any information given to them will be shared with other DLL staff as appropriate. Students should be reminded of this at any point when they volunteer potentially relevant information. A request from a student to a Personal Tutor to not share information with appropriate people should be declined, and the student's SSWO should be informed - although if a student names specific people they do not want the information shared with, this should be respected where possible.

This also applies to any other member of staff not specified above who receives such information from a student.

Email Communication

Special Category data should not be shared or forwarded by email, because of the risk of it accidentally going to the wrong recipient. The preferred means of sharing such information is by

entering it in PATS and then selecting the appropriate linked member(s) of staff to send an email to. An alternative where PATS is not appropriate is to put the information in a Google Doc. This should then be shared with the recipient and a link sent by email in two separate processes.

Emergency Situations

If any member of DLL staff believes that there is a risk of imminent harm to a student or others (most likely in relation to a student's mental health) information may be shared without consent with appropriate parties, including Student Support Services, Residence Life, Campus Security and the University Health Service. The Head of Department / Student Support Manager / Student's SSWO as appropriate should be informed subsequently if such action is taken.

Appendix: Sources of information and links

The University's web pages on data protection, including useful information about GDPR and the Data Protection Act, may be found here <https://www.sheffield.ac.uk/govern/data-protection>

The University's Privacy Notice (information to students) may be found here:

<https://www.sheffield.ac.uk/govern/data-protection/privacy/students>

This sets out how the University collects, stores and shares students' data, and their rights in relation to this. A link to this is provided in the Online Student Handbook.

[Student Support Services' Code of Practice on Student Mental Health and Wellbeing Information Sharing and Confidentiality](#)

This guidance mainly relates to sharing information between departments, and between health services and departments, and does not explicitly address the sharing of information within a department.

Information about DLL Confidentiality Policy is provided to students via the [Online Student Handbook](#) which also provides a link to this document. This information should be checked annually to ensure that it is accurate and up to date.

[Office of the Information Commissioner](#)

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