GUIDANCE ON HOW TO PROCESS MITIGATING CIRCUMSTANCES INFORMATION ('PERSONAL DATA') RECEIVED FROM STUDENTS

To ensure that the University's processing ('handling') of student's personal data meets the requirements of the Data Protection Act 2018 and the General Data Protection Regulation 2016, Staff must:

- Only collect and retain information needed for the specific purpose of administrating mitigating circumstances;
- Store information securely (as outlined below);
- Maintain confidentiality;
- Ensure that the right information is collected; it is relevant and up-to-date;
- Store only what is necessary, and for no longer than necessary- in accordance with the University’s Records Retention Schedule;
- Ensure we can facilitate student's data protection rights such as access to information, rectification etc.

Information on mitigating circumstances received from students must be handled/ shared in line with the guidance set out in the Information Classification and Handling Procedure.

Departments store mitigating circumstances documentation in a number of different ways including, but not limited to:

- Hard copy paper submissions in cabinets
- On webforms
- Via Moodle
- On Files.Warwick
- On email

Anyone who is involved in the management of information relating to a student's mitigating circumstances must ensure that:

- All electronic documentation including information in a departmental shared folder (e.g. records of review meetings/discussions relating to the mitigating circumstances etc.) are/ that:
  - Stored securely with access restricted to authorised staff (those who need to know)
  - Who has access to the information is regularly reviewed
  - That access is via entry of a password in line with the University's password policy
  - That the file names are pseudonymised i.e. make no reference to individual names.

- Shared Drive folders containing sensitive data relating to mitigating circumstances must:
  - only be accessed through the University's VPN
  - using a University approved device

- Where any hard copy documents are stored during the process, these are kept:
  - In a lockable filing drawer or other lockable storage

Hard copy documents should be treated as temporary and shredded when they are no longer needed.

- Ensure information is only shared with those directly involved in dealing with the student’s mitigating circumstances;
- Ensure electronic files shared via Files.Warwick with relevant parties via the send link expire after 7 days;
• Emails must not be used to share information relating to a student’s mitigating circumstances to prevent a risk of the email being sent to the wrong recipient. They should be imported into Files.Warwick and shared that way.

• The mitigating circumstances file must be retained in line with the University’s Records Retention Schedule on a secure, password-protected folder, until it can be deleted.

Future Process

The University is in the process of developing a secure central IT solution to collect and store mitigating circumstances documentation securely. This IT system is expected to be in place for the academic year 2019/20.

Further Guidance and Key Contacts

Should you have any queries or require further guidance, you are able to contact us:

<table>
<thead>
<tr>
<th>Information and Data Compliance</th>
<th>Email: <a href="mailto:infocompliance@warwick.ac.uk">infocompliance@warwick.ac.uk</a></th>
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<tbody>
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Thank you very much for your co-operation.

Anjeli Bajaj, Information and Data Compliance Director, February 2019