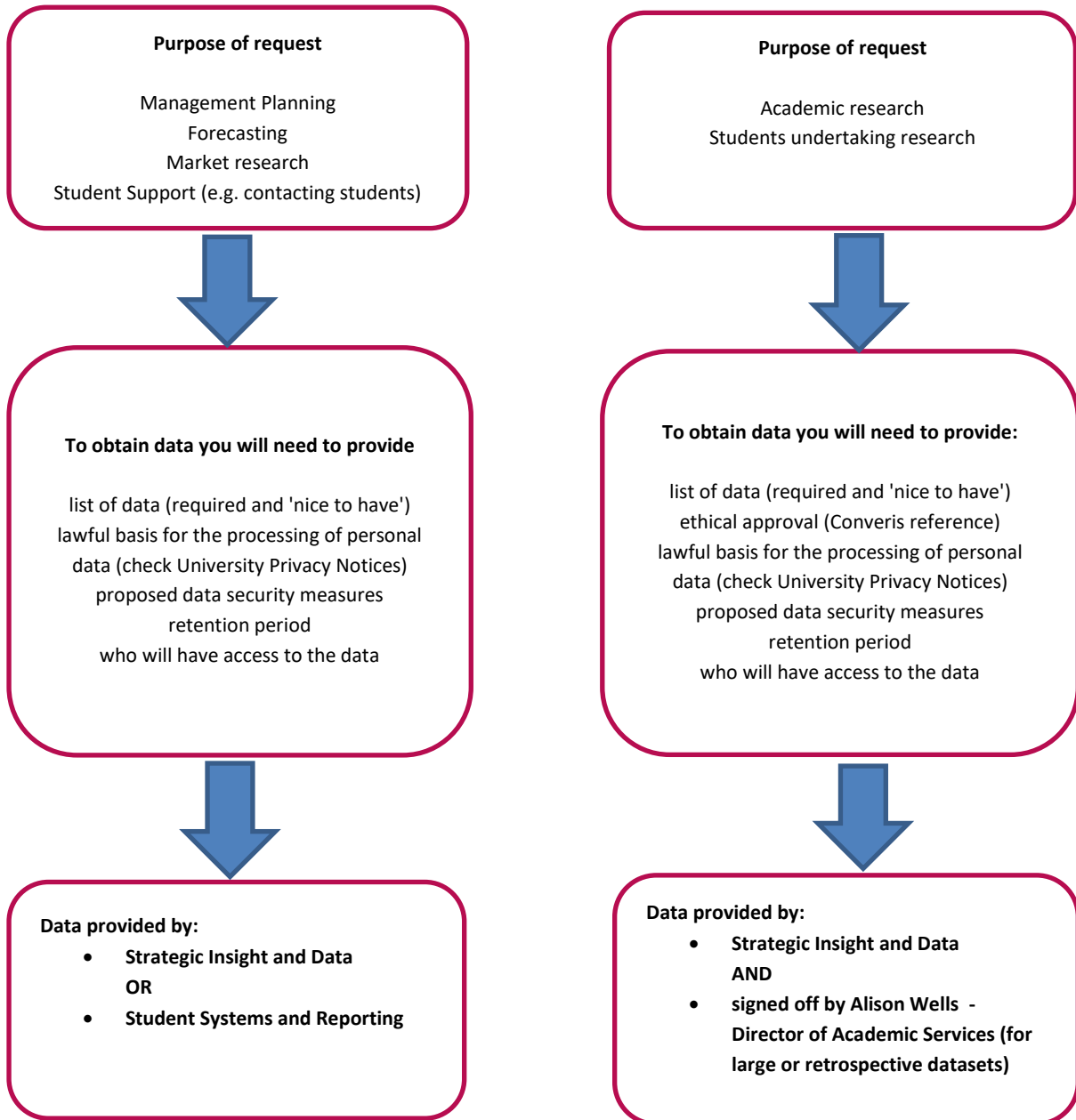


## Internal Data Request Form

When requesting data concerning University students and staff please could you complete the attached request form and return to [! SPI Insight Requests](#).

A complete form will enable us to understand what data you are requesting and the purpose of your request. It will also illustrate that data protection issues around the processing of personal data have been considered.

Guidance on some of the terminology used is provided on the following pages.



### **'Personal data':**

Information relating to natural persons who:

1. can be identified or who are identifiable, directly from the information in question; or
2. who can be indirectly identified from that information in combination with other information.

Includes pseudonymised data – privacy risks may be reduced by pseudonymisation as it is more difficult to identify individuals.

### **Processing Personal Data**

You must always ensure that the processing of personal data is generally lawful, fair and transparent, and complies with all of the other principles and requirements of the GDPR.

Remember that in order for the processing to be lawful, you always need to identify an Article 6 basis for processing.

In addition, you can only process special category data if you can meet one of the conditions in Article 9 of the GDPR

### **'Privacy Notices'**

The University's Privacy Notices set out how we use the personal data of applicants, students, alumni, staff and the general public and identifies the legal basis under which we are processing personal data.

Processing essentially means anything that is done to, or with, personal data (including simply collecting, storing or deleting data).

If you are intending to use personal data for a purpose that is not covered by our privacy notices you will need to identify the lawful basis for the processing you will be undertaking.

### **'Lawful basis for processing' – Article 6 of GDPR**

There are six lawful bases for the processing of personal data. No single basis is 'better' – which one you use will depend on the purpose of the processing.

1. **Contract** – the processing is necessary for a contract that the University has with the data subject(s).
2. **Legal Obligation** – the processing is necessary for the University to comply with the law.
3. **Legitimate Interest** – the processing is necessary for the legitimate interests of the University or those of a third party. If you rely on this lawful basis you will need to complete a legitimate interest assessment (available from the [Information Governance team](#)).
4. **Public Task** – the processing is necessary for us to perform a task in the public interest or for official functions. **This is the most likely lawful basis for research.**
5. **Vital Interests** – the processing is necessary to protect someone's life.
6. **Consent** – the data subject has given clear consent for the processing of their personal data for a specific purpose. Consent must be freely given, specific, opt-in and unambiguous. We need to maintain a record of consent and it can be withdrawn by the data subject at any point. The ICO suggests the other five lawful bases are considered before consent is selected.

### **'Special category personal data':**

Special category data includes personal data revealing **racial or ethnic origin, political opinions, religious or philosophical beliefs or trade union membership; genetic data or biometric data** (where used for identification purposes) and data concerning **health**, a person's **sex life** or **sexual orientation**.

If you are requesting special category personal data you must identify both an Article 6 (GDPR) basis for processing as above and also ensure you can meet one of the conditions for processing in Article 9(2) of GDPR.

- a) **Explicit consent**
  - the data subject has freely given clear consent for the processing of the special category personal data for the one (or more) specified purposes
- b) **Employment, social security and social protection**
  - processing of the special category personal data is necessary to comply with employment law, or social security and social protection law.
- c) **Vital interests**
  - processing of the special category personal data is necessary to protect the vital interests of the data subject where they are physically or legally incapable of giving consent.
- d) **Not-for-profit bodies**
  - relates to processing carried out by not-for-profit bodies.
- e) **Made public by the data subject**
  - the data subject has **deliberately** made the personal data available within the public domain/
- f) **Legal claims or judicial acts**
  - the purpose of the processing is to establish, exercise or defend legal claims.
- g) **Reasons of substantial public interest**
  - processing of the data is necessary for reasons of substantial public interest, and the rights and interests of the data subject have been safeguarded.
- h) **Health or social care**
  - processing of the data is necessary to provide for preventative/occupational medicine, provision of health and social care, or the assessment of working capacity.
- i) **Public health**
  - processing of the data is necessary for reasons of public interest in the area of public health.
- j) **Archiving, research and statistics \***
  - **processing of the data must be a reasonable and proportionate way of achieving archiving, research or statistical purposes, more data than required must not be used and it must be demonstrated that the processing is in the public interest.**

**It is likely that Article 9(2)(j) is the most appropriate legal basis to rely upon when processing special category personal data for research purposes.**

**Internal Data Request Form** - please complete and return to [! SPI Insight Requests.](#)

Name			
Role			
Please describe the data that you would like to request			
Is there any data that is not essential for your project but would be 'nice to have'?			
For what purpose are you requesting the data?			
If you are requesting data for research please confirm that you have followed the University's <a href="#">research ethics approval procedures.</a>	<input type="checkbox"/> Yes <input type="checkbox"/> No Converis reference:		
Please indicate if the processing of any personal data is covered by the University's <a href="#">Privacy Notices:</a>  <input type="checkbox"/> Yes <input type="checkbox"/> No  If you have answered 'no' please answer the questions to the right:	Please indicate the <a href="#">lawful basis for processing</a> under Article 6 of GDPR:		
	<input type="checkbox"/> Contract	<input type="checkbox"/> Public Task	<input type="checkbox"/> Vital Interests
	<input type="checkbox"/> Legal Obligation	<input type="checkbox"/> Legitimate Interests *	<input type="checkbox"/> Consent
	If you are requesting <a href="#">special category personal data</a> please indicate the condition for processing under Article 9 of GDPR:		
	<input type="checkbox"/> Explicit consent	<input type="checkbox"/> Legal claims / judicial acts	
	<input type="checkbox"/> Employment, social security and social protection	<input type="checkbox"/> Reasons of substantial public interest	
	<input type="checkbox"/> Vital interests	<input type="checkbox"/> Health or social care	
	<input type="checkbox"/> Not-for-profit bodies	<input type="checkbox"/> Public health	
<input type="checkbox"/> Made public by the data subject	<input type="checkbox"/> Archiving, research and statistics		
If you do not have a research data management plan please answer the questions to the right:	<b>Who will have access to the data and where will it be stored?</b>		
	<b>How will the security of the data be maintained?</b>		
	<b>How long do you intent to store/process the data</b>		