



**Policy document for the processing of Special Category Data and Personal data about criminal convictions and offences in accordance DPA 2018.**

This is the 'appropriate policy document' for Harper Adams University that sets out how the University will protect special category and criminal convictions personal data.

It meets the requirement at paragraph 1 of Schedule 1 and Schedule 1 Part 4 of the Data Protection Act 2018 that an appropriate policy document be in place where the processing of special category personal data (SCD) is necessary for the purposes of performing or exercising obligations or rights which are imposed or conferred by law on the controller or the data subject in connection with employment.

agencies upon request, but an appropriate policy document is not required with regard to such processing.

- iv. Paragraph 11 (~~2~~) Protecting the public against dishonesty
  - This condition applies to special category personal data or personal data about criminal convictions and offences collected or used under fitness to practice procedures for students on professional courses (e.g. Veterinary Surgeons & Veterinary Nurses.) The processing of such data is in the substantial public interest in ensure the safety of the public with regard to students working towards becoming part of these regulated professions.
- v. Paragraph 12 (1 & 2) Regulatory requirements relating to unlawful acts and dishonesty,
- vi. Paragraph 17 (~~2~~) Counselling etc,
  - Most special category personal data or personal data about criminal convictions and offences used during student/staff counselling or other student/staff welfare support services is collected with the explicit consent of the data subject. On the rare occasions when processing is not carried out with explicit consent, it would only be because a substantial public interest has been identified and is being acted upon (e.g. to prevent harm arising to that subject or others by a disclosure to another part of the University)
- vii. Paragraph 18 (~~4~~) Safeguarding of Children and of individuals at risk
- viii. Paragraph 20 (~~7~~) Insurance,
- ix. Paragraph 21 (~~4~~) Occupational Health and Safety (including first aid),

- Ensure that personal data is only processed where a lawful basis applies and where processing is otherwise lawful
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