

Data Protection and GDPR

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Introduction

Introduction - Principles

The Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation

GDPR Principles

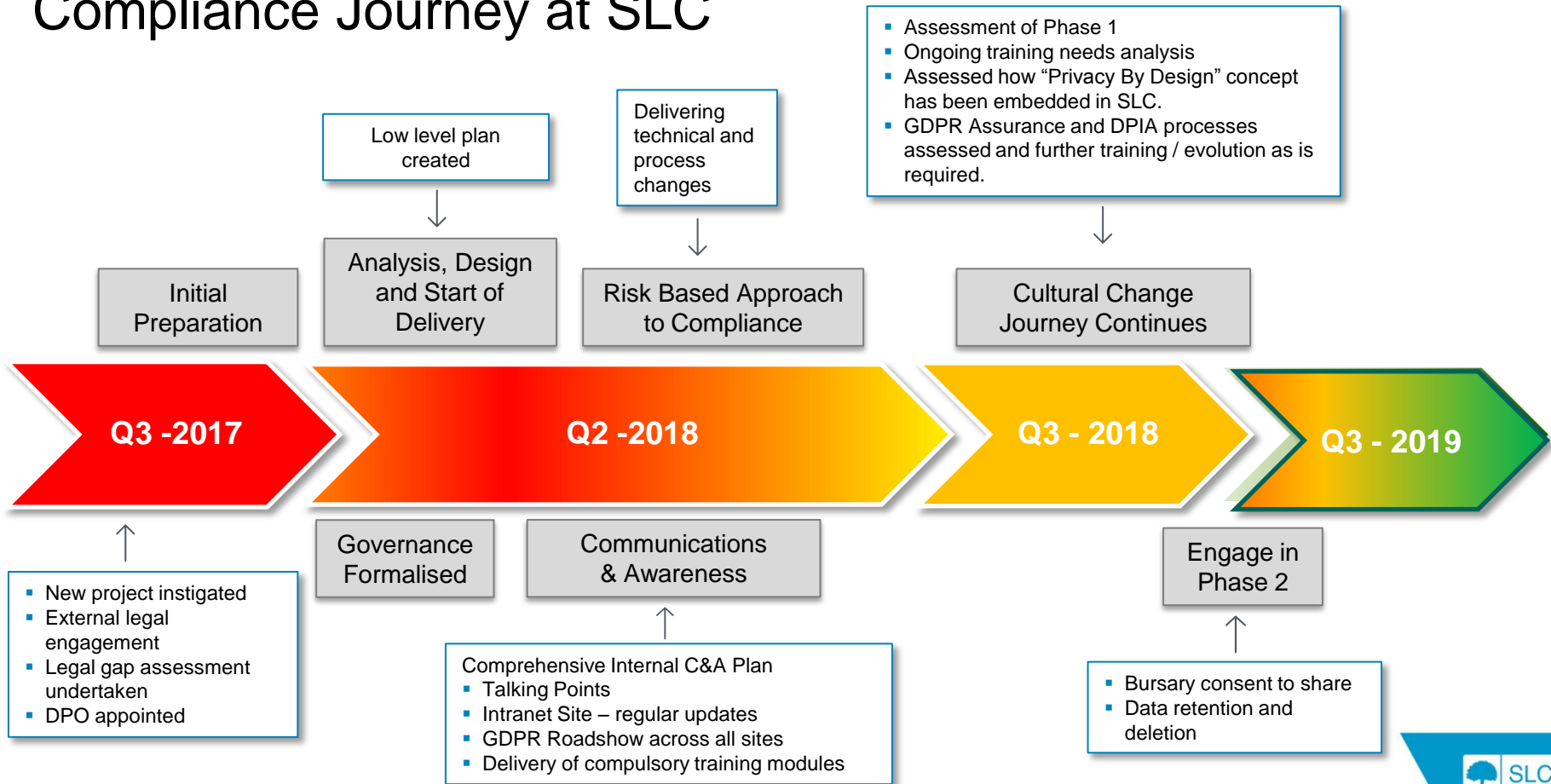
- Lawfulness, fairness and transparency
- Collected for specific, explicit and legitimate purposes
- Adequate, relevant and limited to what is necessary
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability





Compliance Journey

Compliance Journey at SLC





Approach to Complying with Principles

Lawful and Transparent

Student

Decide how to communicate changes to our customers

- Proactively push changes vs not
- No fundamental changes had been made to how we handled personal data
- We were changing how we communicated about how we handled personal data

Update our Privacy Notice and Terms and Conditions

- Customer Application – “forced” to read T&Cs before they can submit electronic signature
- Website updated with Privacy Notices
- Update T&Cs on paper forms

Bursary Consent

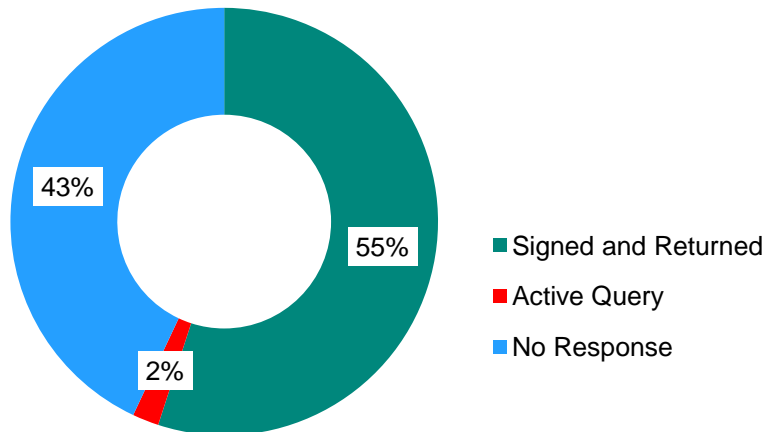
- Individuals need a mechanism that requires a deliberate action to opt in

Lawful and Transparent

Providers

Introduce signed GDPR/ Data Protection statement as part of our Provider Service Agreement

GDPR Agreement - Provider Response



- Of the 1655 issued, 908 (55%) have signed and returned their Service Agreement
- An average of 15 are returned each week

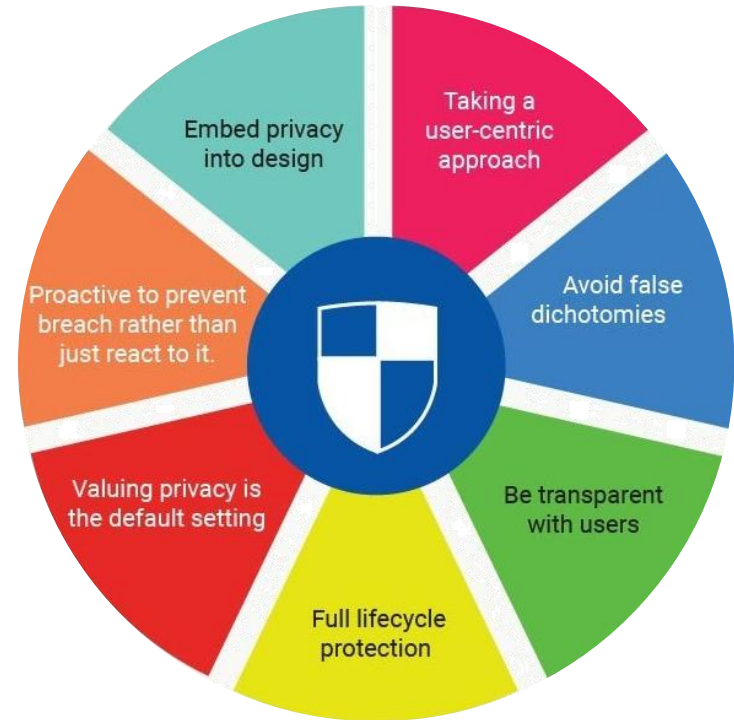
Lawful and Transparent

Data controller/ Data Processor Relationship

- Student finance data provided by applicants for the purpose of assessing and paying student finance
- Applicant consents that SLC share the data with third parties for this purpose
- This data is shared through SLC's Student Information Service (SIS)
- HEP becomes data processor of this information for the purposes for the purpose of confirming/updating course, fee, registration and attendance
- Breach Reporting

Collected for Legitimate Purposes

Embed the principles of “privacy by design into our projects, systems and processes



Accuracy and Security



Information Asset Ownership

All systems have an Information Asset Owner & Information Asset Lead

- What data do SLC hold
- When and how it is used
- Who has access to it and why
- Data Protection Impact Assessment



Security enhancements



Enhanced Support Desk procedure and spreadsheet management

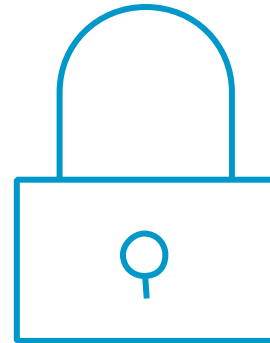


Data Protection Officer/ Office

- Data Subject Access Requests
- Request for Erasure
- Data Breach

Accuracy and Security

- Security Team now part of projects rather than reviewing output at end of process
- System Accounts – carrying out a review of system users to delete old accounts
- Passwords – Enforce message not to share passwords
- Support Desk – validate provider contact against Portal contacts
- Enhanced security when sharing spreadsheets containing PI
- Sample Data



Storage Limitations

GDPR Article 5:

'personal data shall be kept for no longer than is necessary for the purposes for which it is being processed'



Student Loan Company holds large volumes of PI data

- Personal details for 7 million current and former customers
- Collect £2billion repayments each year
- Customer can be in repayment for up to 30 years

One application can include PI details for:

- Student
- Contacts
- Dependents
- Third Parties
- Guardians/Sponsors

Storage Limitations

“No longer than necessary” can be subjective

- Starting point - splitting payment customers from non payment customers
- 3 million HE UG customers on our system since 2000 with applications that didn't reach approval
- 550k customers with approved applications on our payment system that have never had a payment



Storage Limitations



Bulk erasure approach for non payment applications

- Identify and delete all “lapsed applications”
- Identify and delete all “unattached customers”
- Establish retention triggers and retention period rules



Rules

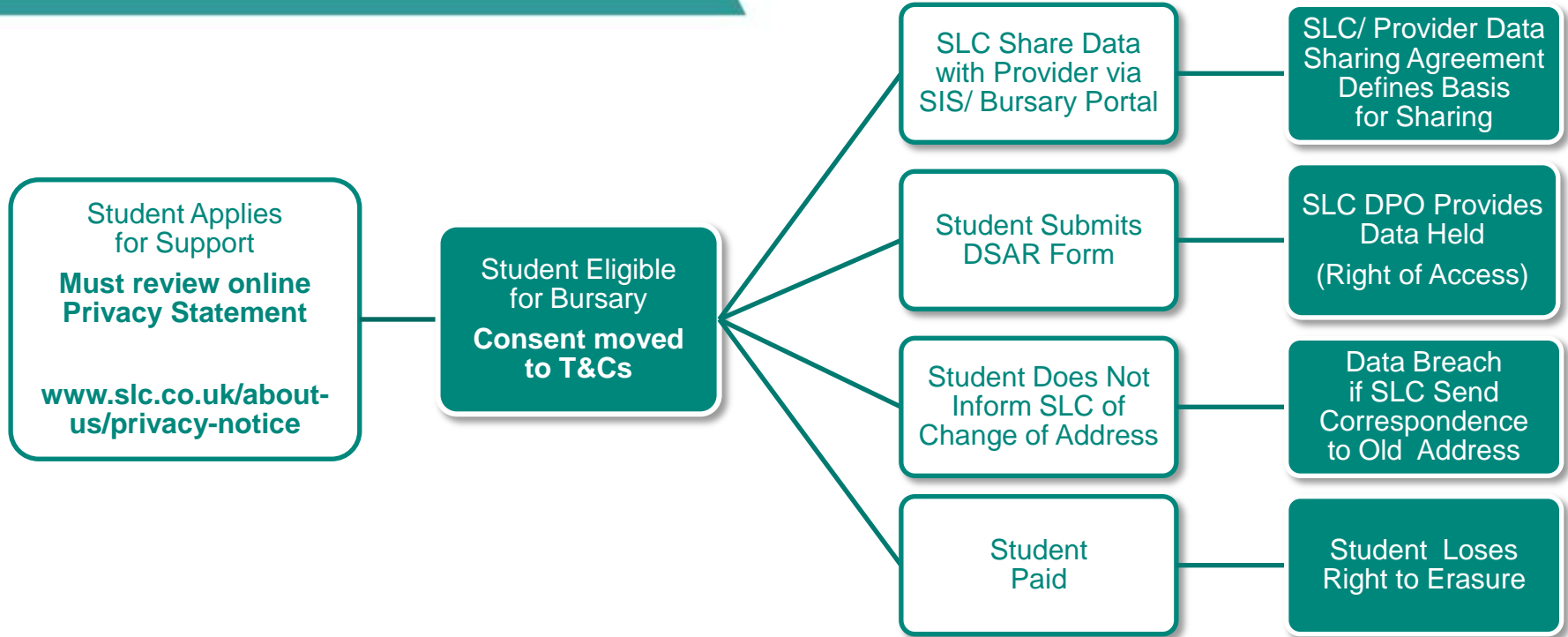
Lapsed applications

- Trigger – 12 months from the start of the academic year
- Period – 6 months



Payment applications will be looked at in phase 2

Case Study – Student Journey



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The slide features several decorative elements: a teal and yellow geometric shape in the top left; a blue triangle in the top right containing the SLC logo; a white grid pattern in the bottom left and bottom right corners; a red shape in the bottom left; and a teal, pink, and purple geometric shape in the bottom right. A vertical orange bar is positioned to the left of the main text.

Thank you