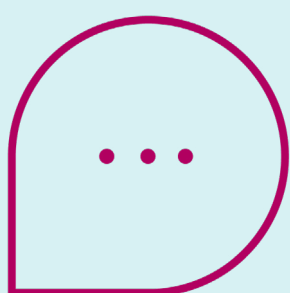




Set a retention period for the information you gather when handling complaints and appeals, and tell students how long you will be keeping this information for

Since students who complete your processes have 12 months from the date of the Completion of Procedures Letter to bring a complaint to the OIA, you have a legitimate reason to keep the information for a minimum of 15 months (to allow the OIA some time to tell you if a complaint or appeal has been received!). Of course, not every student who starts a complaint or appeal will finish the formal processes; so you may choose to define your retention period from the date the processes start.



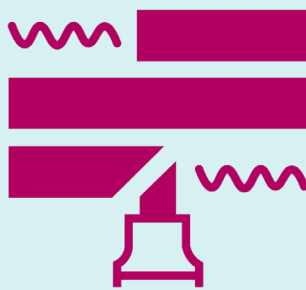
Tell students when they submit a complaint or appeal, what you will do with their information, and how long you will keep it for

The Good Practice Framework emphasises the need to treat complaints and appeals with an appropriate degree of confidentiality, disclosing information only to those who need it to investigate or respond to the issues raised. It is helpful to explain this principle to students. You should also explain if any information provided by the student in a complaint or appeal might be used in another way. An example might be that you might have to use information provided by the student in mitigation for an academic result, to consider their fitness to practise in a particular profession.



Ask students not to include unnecessary personal information, particularly about third parties, in their appeals or complaints

For example, you could emphasise to students that, if they have mitigation based around the health of a family member, you do not need to see detailed medical information about that person; what you need is evidence about the effect the circumstances have had on the student themselves. Article 14 of the Regulations means that you need to notify third parties that you are processing their data, so it is helpful to minimise the amount of unnecessary personal data you hold.



Brush up on how to use tools for redaction, anonymisation and using pseudonyms

We often receive submissions which contain sensitive personal information which has not been fully removed. For example, if you cover text by using black highlighting, then the text underneath can still be read by changing the font colour to white. Make sure you check all the worksheets in a spreadsheet, and the document properties and metadata too!



Think about your staff's personal data

For example, tell all your staff that information about them acting in their professional capacity may be disclosed to the OIA, if it formed part of the information which you considered under your internal processes. Sometimes this may include sensitive personal data; for example, we might see information in a complaint about supervision which reveals that a member of staff was unavailable at a critical time due to illness. Think about the legal basis which allows you to process staff data in this way.