Title: Data Protection Principle 2

Version: 1.0  Effective Date: June 2013

Summary: Description of the procedure for ensuring that personal data is managed in accordance with specified and limited purposes

When using this document please ensure that the version you are using is the most up to date by checking on the University’s online document system for any new versions.

1 Background

The Data Protection Act 1998 regulates the way in which organisations collect, hold, use and dispose of personal data. These activities are collectively known as “processing”. The Act lists 8 principles which organisations must apply when they are processing the personal data of individuals.

The second data protection principle states that “personal data shall be obtained only for one or more specified and lawful purposes, and shall not be processed in any manner incompatible with that purpose or those purposes”.

2 Purpose

This standard operating procedure (SOP) applies to the processing of all personal data by The University of Manchester.

The purpose of this SOP is to define those procedures which apply to the processing of personal data by The University of Manchester to ensure that it is undertaken in accordance with the second principle.

3 Procedures

When personal data is obtained from an individual, that individual must be informed of the purpose(s) for which that data is to be processed. This information will generally form part of the collection notice which must be given to data subjects when personal data is collected from them.

The list of purposes for which the University is registered to process personal data are listed in our entry on the data protection register held by the Information Commissioner’s Office. If you collect data for a purpose which is not included on this list please inform the Records Management Office.

No personal data should be processed for any purpose which is not included in the University’s registration with the ICO, and all data should only be processed for the purpose for which it was originally collected, and of which the data subjects have been informed.

It is a breach of the Act to use data collected for one purpose for another unless the data subjects have been informed of this new purpose and have consented to it. It would not be possible, for example, to use personal data collected at registration for a research project, or to use photographs taken for security identification purposes for publicity material.
In practice this principle of the Act means that we need always to consider the expectations of the data subject. If you are processing somebody’s personal data in a manner which is inconsistent with the reason for which they think you hold their data, or which they would not expect from the information which you have given to them, you are probably breaching the second principle. Data subjects should always be given full and honest information about what their data will be used for, and the University abide by the information which it has given.

4 In summary

The University should be clear about the purpose(s) for which it is collecting and processing data. The University should tell data subjects the purpose(s) for which their personal data will be processed, and should not use this data for any other purpose, or in a manner which the data subject would not expect.

The University must ensure that all purposes for which it processes data are registered with the ICO.

5 Contact for queries related to this procedure

<table>
<thead>
<tr>
<th>Role</th>
<th>Name</th>
<th>Telephone</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Records Manager</td>
<td>Alan Carter</td>
<td>0161 275 8111</td>
<td><a href="mailto:Alan.Carter@manchester.ac.uk">Alan.Carter@manchester.ac.uk</a></td>
</tr>
</tbody>
</table>

Document control box

- **Procedure title:** Standard Operating Procedure - Data Protection Principle 2
- **Version:** 1.0
- **Date approved:** June 2013
- **Approved by:** Martin Conway (Data Protection Officer)
- **Supersedes:** N/A
- **Next review date:** June 2015
- **Related policies and procedures:**
  - Data Protection Policy
  - Data Protection Standard Operating Procedures
- **Related guidance and / or codes of practice:** Data Protection Guidance
- **Related information:** ICO guidance on Data Protection Principle 2
- **Policy owner:** Data Protection Officer (Martin Conway)
- **Procedure owner:** Records Manager (Alan Carter)