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 third data protection principle states that “personal data shall be adequate, relevant and not excessive in relation to the purposes for which they are processed”.

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 adequate, relevant and not excessive.

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 is 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.

Data which is collected for a specified purpose must be adequate, relevant and not excessive for that purpose. Staff must collect the data that they need and enough to fulfil the stated purpose(s), but ensure that they do not collect data which they do not need.

All mechanisms by which data is collected, paper or online forms for example, should be reviewed on a regular basis to ensure that this principle is adhered to. Any data field which is unnecessary should be discontinued. If it is apparent that the data being collected is insufficient for the originally intended purpose, new fields should be added.

Data should only be held relating to individuals who are still relevant to the original purpose for which the data was collected. It will often be excessive to hold data about individuals who are no
longer connected to that purpose, even though other individuals whose data was collected at the same time and for the same purpose are still relevant.

For these reasons it is important that data collections are properly planned, and that the data that will be needed for the purpose of the collection is properly understood in advance of any data collection. It is not good practice, and can be a breach of the Data Protection Act, to collect more data than necessary in case it comes in useful later, or because the process has not been thoroughly planned.

It is also important to tailor data collections to specific activities and not to have standard collection forms which are too generic. It would be inappropriate, for example, to ask for health conditions which are not relevant for a particular job because you were using a generic application form.

4  In summary

The University should collect data that is adequate and relevant for the purpose(s) for which it is to be used.

The University should ensure that data collected for a specific purpose is not excessive for the purpose for which it is to be used.

5  Contact for queries related to this procedure

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**Document control box**

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  - Data Protection Standard Operating Procedures
- **Related guidance and/or codes of practice:**
  - Data Protection Guidance
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- **Policy owner:** Data Protection Officer (Martin Conway)
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