

Standard Operating Procedure

Title:	Data Protection Principle 4		
Version:	1.0	Effective Date	June 2013
Summary	Description of the procedure for ensuring that personal data is kept accurate and up to date		

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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 fourth data protection principle states that personal data must be kept accurate and, where necessary, up to date.

Data is described as being “inaccurate” if it is “incorrect or misleading as to any matter of fact”.

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 kept accurate and up to date.

3 Procedures

It is the duty of the University to ensure that data is accurate when it is collected. Even if the University uses an external party to provide or collect data for it, the responsibility for accuracy still rests with the University as the data controller and cannot be delegated.

When data is collected from an individual a mechanism should be provided whereby that individual may provide amendments to the data to keep it accurate and up to date.

It may be appropriate to send regular (perhaps annual) requests for data to be verified and updated, or requests for details to be updated can be sent to individuals when necessary.

The University will not breach the Act if it has taken reasonable steps to ensure that personal data it keeps and uses is accurate.

Where an individual informs the University that a piece of personal data held about him or her is inaccurate, but the University disagrees, a note should be kept with the data recording this.

The older data is the more likely it is to be out of date or inaccurate. It is important therefore that personal data is disposed of in a timely fashion in line with the University's [Retention Schedule](#).

In practice it will be difficult for the University to check the accuracy of every piece of personal data collected and held. It is particularly important, therefore, that data which is most likely to be inaccurate or outdated is identified and checked.

The easiest time to try to ensure the accuracy of data is on collection. It is important therefore that the source of data is known.

4 In summary

The University must make reasonable efforts to ensure that data is accurate and kept up to date, if necessary.

5 Contact for queries related to this procedure

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Document control box	
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Related guidance and/or codes of practice:	Data Protection Guidance
Related information:	ICO guidance on Data Protection principle 4
Policy owner:	Data Protection Officer (Martin Conway)
Procedure owner:	Records Manager (Alan Carter)