Electronic Data Sharing with External Bodies:
Summary of Procedure

Overview
The procedure covers all instances of sharing University data with third parties, such as internal or external auditors.

Roles and Responsibilities
The manager with organisational responsibility for the data is the Data Custodian.

The University is the Data Owner.

Sharing requests can only be approved by the Authorising Officer – the Chief Administrative Officer and Secretary.

A named person at the external body will be the Accountable Third Party.

Process
1. Ask the Compliance Team if the data can be shared under the Data Protection Act.
2. Check whether any alternatives are available – is the data sharing really necessary?
3. Check whether data sharing would be covered in the terms and conditions of your current agreement with the third party. If not, create new terms and conditions.
4. Complete the request form at http://centralinfo.lancs.ac.uk/sites/DataSharing and submit it to the Authorising Officer
5. Respond to any objections from the Authorising Officer – either change the scope of the sharing request or make the terms and conditions clearer.
6. Resubmit the request form to the Authorising Officer.
7. If approved, you can now share the data. If not, speak to the Third Party about alternative arrangements.
8. Set a reminder for the end of the engagement.
9. Encrypt the data (ask Information Systems Services for advice if needed), and share the data and encryption key separately with the Third Party.
10. Remind the Third Party to delete the data and confirm it has been deleted when relevant.

N.B. At all stages in the process, you must ensure that the data is protected from loss or destruction, and that you have complied with the eight principles of the Data Protection Act (http://www.legislation.gov.uk/ukpga/1998/29/schedule/1).
Further Guidance

If you have any questions about the process, please contact the Compliance Team in the Secretariat. Email: compliance@lancaster.ac.uk or call ext. 92165.