



Sule Lamido University Kadin Hausa

Data Protection Policy

Developed by ICT Directorate

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Preface

As the Vice Chancellor of Sule Lamido University Kafin Hausa, it is my pleasure to introduce the University's Data Protection Policy, a critical document that reflects our commitment to protecting the personal data of all individuals associated with the University. In an increasingly data driven world, it is essential that we adhere to the highest standards of integrity, transparency, and accountability in handling the sensitive information entrusted to us.

This policy has been developed to ensure that the University complies with all relevant data protection regulations, including the Nigerian Data Protection Regulation (NDPR) of 2019, the Nigeria Data Protection Act of 2023, and other applicable international standards. It is designed to protect the rights and privacy of our staff, students, and stakeholders, while enabling the University to carry out its educational, research, and administrative functions effectively.

The document covers a comprehensive range of topics, from the legal basis for processing personal and special category data to the rights of individuals, data security, and the role of the Data Protection Officer. Additionally, it outlines the procedures for handling data breaches, whistleblowing, and ensuring that confidentiality is maintained at every level. Special provisions are also made for academic research, ensuring that while we advance knowledge, we do so responsibly and ethically.

As an academic institution, we recognize that the responsible handling of personal data is fundamental to maintaining the trust and confidence of our community. This policy not only safeguards the privacy of individuals but also promotes a culture of openness and accountability. We are committed to ensuring that all staff are adequately trained in data protection and that our processes are continuously reviewed to meet evolving legal and ethical standards.

I urge all members of the University to familiarise themselves with the provisions of this policy and to act in compliance with its principles. By doing so, we can continue to uphold the values of integrity, respect, and responsibility that are central to our mission at Sule Lamido University Kafin Hausa, Jigawa State, Nigeria.

Together, let us ensure that our community remains a safe and secure environment for learning, research, and development.

Professor Mohammad Ibrahim Yakasai, *facasson, mnae*
Vice Chancellor, Sule Lamido University, Kafin Hausa, Jigawa State, Nigeria

1. Preamble

The Data Protection Policy of Sule Lamido University Kafin Hausa, Jigawa State, Nigeria outlines the principles and guidelines for handling personal data. It ensures that the institution complies with relevant data protection laws, safeguards individuals' or organisational privacy, and manages data securely. This policy is applicable to staff, student, and all stakeholders that are in partnership with the University.

2. Purpose

The purpose of this policy is to ensure that all personal and institutional data are collected, processed, used and stored in a lawful; fair; and transparent manner in accordance with the global best practices. The policy is designed to protect the confidentiality, integrity, and availability of data while also promoting accountability and trust in the University's data handling practices.

3. Scope

This policy applies to all staff, students, contractors, service providers and other stakeholders whose data are handled by the University. It covers all types of personal data processed by the University, including student records, staff information, research data, and any other data that relate to an identifiable person.

4. Relevance

In alignment with Nigerian Data Protection Regulation (NDPR) of 2019, the Nigeria Data Protection Act of 2023¹ and global data protection standards, this policy is useful to Sule Lamido University Kafin Hausa in complying with legal obligations and ethical standards. It also helps foster trust among students, staff, and partners by ensuring that their data is handled responsibly and securely.

5. Policy statement

Sule Lamido University Kafin Hausa, Jigawa State, Nigeria as an academic institution, an employer and as a service provider is committed to complying with the rules and regulations relevant to Data Protection. Hence, the University makes effort to ensure that:

- I. Data processing is conducted in a legal and fair manner.
- II. Adequate security is given to personal data for the protection of individual privacy and rights.

6. Interpretations

The commonly used terms in this policy document are defined as follows:

- I. **Data** means information
- II. **Personal data** is any type of data that can be used to directly or indirectly identify an individual (data subject). This may include name, picture, phone number, matriculation number, staff number, address (which enable direct identification), IP address or user name (which enable indirect identification).
- III. **A Data Subject** is the individual who is the subject of personal data.
- IV. **A Data Processor** is any individual or organisation that processes personal data on behalf of and according to the purposes defined by the data controller.
- V. **A Data Controller** determines the purposes for which personal data are processed. The controller is ultimately responsible for the personal data, and

¹ https://ndpc.gov.ng/Files/Nigeria_Data_Protection_Act_2023.pdf

decides whether the data is passed to a data processor or not. The data controller is also responsible for attending to Subject Access Requests and complaints from data subjects.

- VI. **Special Category Data** are personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data and health data. The purpose of special category data is to uniquely identify a natural person or data concerning a natural person's life.
- VII. **Unauthorised Disclosure of Confidential Information:** mean disclosure of information without formal consent

7. Principles

The University is to process personal data according to the following six principles:

S/N	Data Protection Principles	Context for the University
1	Lawfulness, fairness and transparency	The University is committed to ensuring that staff, students, and all data subjects are fully informed about how their personal data will be processed
2	Purpose limitation	The University commits itself to using personal data solely for the purposes it was originally collected.
3	Data Minimisation	The University is to collect only personal data that is relevant to the purposes for which it is needed.
4	Accuracy	The University ensures that personal data is accurate, up to date, and can be promptly corrected if any errors are identified.
5	Storage Limitation	The University does not keep collected personal data longer than necessary.
6	Integrity and Confidentiality	The University is to safeguard personal data from unauthorized access, loss, or destruction using a variety of security measures.

8. Legal Basis for Processing Personal Data

The University will strive to meet lawful bases in order to process personal data. The most common for the University are the following:

S/N	Legal Basis	Context
1	Performance of contract, Employment and studentship	Covers the majority of data processing for students and Staff
2	Data subject has given consent to the processing	Covers mailing lists, marketing and other optional services for staff, students and customers
3	Performance of a task carried out in public interest or in the exercise of official authority vested in the controller	Covers the retention of student graduation lists and transcript information for awards and verification
4	Legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject.	Covers activities around alumni, charitable works and marketing of commercial services

9. Legal Basis for Processing Special Category Data

For special category data, the University is required to have additional legal basis for processing, as set out in the University ICT Policy.

S/N	Legal basis	Context
1	Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject	Sickness absence, Notifying the University of Trade Union membership
2	Processing relates to personal data which are noticeably made public by the data subject	Alumni research, honorary degrees, ethical donations Assessment
3	Processing is necessary for the purposes of preventive or occupational medicine for the assessment of the working capacity of the employee	Occupational therapy assessments
4	Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes	Analysis and reporting of equality and diversity information

10. Rights

Data subjects: students, staff and partners have a number of rights under this policy. These include:

S/N	Right	Context
1	Right of access	Data subjects have the right to know how their data is used, verify its being handled correctly, and request a copy of the data the University holds.
2	Right to rectification	The University must ensure its data is accurate. If a data subject thinks something about their data is wrong, they can ask for this to be corrected. The University will assess the request and correct any inaccuracy.
3	Right to erasure / right to be forgotten	Data subjects have the right to ask the University to remove or delete data about them in the possession of the University. The University will assess the request against the criteria in the ICT Policy and consider accordingly.
4	Right to restriction of Processing	Data subjects may, in the course of a dispute with the University about the use of their data, ask the University to stop using their data if certain criteria apply.
5	Right to data portability	Data subjects have the right to ask the University to provide them with a re-usable electronic copy of their data to allow them to transfer it to another provider. This only covers data submitted to the University by the subject or data observed from the subject's use of a service. If technically possible, the University will consider transferring information directly to another provider.
6	Right to object	Data subjects have the right to object to processing based on legitimate interests, legal obligation or for the purposes of direct marketing or for scientific, historical research or statistical purposes. The University will assess the request and consider appropriately.
7	Automated decision making, including profiling	If the University is making decisions about data subjects through purely automated means such as a computer algorithm, data subjects can appeal against this decision. The University will ensure that subjects can express their point of view and assign a member of staff to attend to the complaints.

11. Security and Protection of Personal Data

The University is dedicated to embedding privacy into its processes and outcomes. The University's ICT Policy and Program is designed to ensure compliance with integrity and confidentiality principle of personal data. Any new projects involving personal data must conduct a privacy impact assessment to identify potential privacy risks and develop suitable mitigation strategies.

12. Data Protection, Confidentiality and Anonymity

a. Transparency and Openness

The University, like all other public bodies, has a duty to conduct its affairs in a responsible and transparent way. The University wishes to foster an open and transparent culture where members of staff are able to speak freely and without being subject to disciplinary sanctions or detrimental treatment about academic standards, research conduct, business dealings and other related matters.

It is important to the University that any fraud, misconduct or wrongdoing by staff or others is reported and dealt with properly. The University encourages all individuals to raise any concerns that they may have about the conduct of others in running the affairs of the University. Certain individuals, by virtue of the requirements of their profession may also have a professional duty to make a disclosure. The Nigeria's Whistleblowing policy of 2016² has set out provisions by which individuals may raise concerns that they have and how those concerns will be dealt with.

b. Whistleblowing and Reporting

In order to encourage staff to report suspected wrongdoing as soon as possible having the knowledge that their complaints will be investigated as appropriate, and their confidentiality will be respected. The University encourages staff to become whistleblowers under this Policy. All reasonable steps shall be taken under the Nigerian whistleblowing policy Act 2016 to protect the identity of legitimate whistleblowers. However, if an individual is concerned about possible reprisals if their identity is revealed and wants to raise a genuine concern confidentially, the University will make every effort to keep their identity secret.

c. Protection and Confidentiality of Whistleblower

It is acknowledged that whistleblowers may have concerns about potential repercussions. The University is committed to fostering an environment of openness and will support members of the University who raise genuine concerns under this Policy.

No staff member will experience any detrimental treatment as a result of raising any concern. Detrimental treatment encompasses actions such as dismissal, disciplinary measures, threats, or any other unfavorable treatment. Any acts of detrimental treatment, threats, or retaliation against a staff member for making a credible disclosure will be considered a serious disciplinary offense.

² <https://www.fbnholdings.com/wp-content/uploads/2021/05/WHISTLE-BLOWING-POLICY-AND-PROCEDURE.pdf>

d. Whistleblower Anonymity

In accordance with Nigerian Whistleblowing Policy Act of 2016, the University does not accept anonymous whistleblowing disclosures. Proper investigations may be difficult or even impossible if the University is unable to seek further information from the individual making the report. Additionally, it is hard to determine the credibility of allegations without identifiable sources. While whistleblowers can request anonymity from the public, a complaint must include the complainant's name, address, and signature. Therefore, anonymous submissions will not be investigated.

The identity of the whistleblower will be kept confidential during the investigation. However, if the accusation is proven to be false, the whistleblower's identity must be disclosed, and appropriate disciplinary actions taken. Despite the option for confidentiality, it is essential that complaints are not submitted anonymously.

e. Conspiracy to Bring False Accusation

While the University encourages whistleblowing in accordance with Nigeria's Whistleblowing Act, 2016, it does not accept anonymous disclosures. Any staff member or external party who conspires to falsely accuse another staff member of an offense, knowing that the accused is innocent, will be deemed to have committed libel. In accordance with Section 125 of the Nigerian Criminal Code Act, such actions will result in disciplinary actions as outlined in the Conditions and Regulations of the University's scheme of service. For cases involving external disclosures, the matter will be referred for legal action. This policy is implemented in good faith to prevent unwarranted character assassination of staff members.

13. Information Breach, Unauthorized Access and disclosure of confidential information

Where an unauthorized person or entity accesses confidential Information in any manner, including but not limited to:

- I. any Confidential Information that is not encrypted or protected is misplaced, lost, stolen or in any way compromised;
- II. one or more third parties have had access to or taken control or possession of any Confidential Information that is not encrypted or protected without prior written authorization from the University;
- III. the unauthorized acquisition of encrypted or protected Confidential Information together with the confidential process or key that is capable of compromising the integrity of the Confidential Information; or
- IV. if there is a substantial risk of identity theft or fraud to staff or students of the University.

Disclosure of confidential information such as internal memo (not for public consumption), minutes of meetings, Data Records, examination questions and any other information belonging to the University through either electronic means or print copies, or aiding unauthorized access in any of the Four (4) form of breaches described above, the person concern shall be liable to disciplinary action and punished in accordance to the Conditions and Regulations of the University's scheme of service. The person may be prosecuted also depending on the degree of damages caused to the University.

14. The Data Protection Officer

In accordance with the Nigerian Data Protection Act 2023, the University has appointed a data protection officer, whose contact details are as follows:

Data Protection & Information Compliance Officer:

Email: dpo@slu.edu.ng;

Phone No.: 080 xxx

Address:

Management Information System (MIS),

Directorate of Information and Communication Technology (DICT)

Sule Lamido University,

P.M.B 048, Kafin Hausa, Jigawa State.

15. Training and awareness

The University is committed to ensuring its staff have the requisite training and awareness on data protection. All staff and students are required to undertake the mandatory 'Data Protection' and 'IT Security' training.

16. Data Management

The University may use an external contractor or 'data processor' to store or manage its data. It will process this data only for purposes specified by the University and will be bound by contract to meeting the University's obligations under the Nigeria Data Protection Act 2023.

17. Academic Research

Academic research which involves the processing of personal data is subject to the General Data Protection Regulation. All academic projects are subject to the Research Ethics policy, which includes specific directions for projects involving personal data. Ethical approval must be obtained before embarking on such a research work.

18. The University as Processor

Where the University, in the course of its academic or commercial activities, acts as the processor, it will process the personal data only on documented instructions from the controller in order to ensure that persons authorised to process the personal data have committed themselves to confidentiality or are under an appropriate statutory obligation of confidentiality.

19. Further Information

Any questions relating to this Data Protection policy should be directed to the Data Protection & Information Compliance Officer at: dpo@slu.edu.ng. phone no.: 080xxxx

Address:

Information and Data System Sub Unit,

Management Information System(MIS)

ICT Directorate, Sule Lamido University Kafin Hausa

P.M.B 048, Kafin Hausa, Jigawa State, Nigeria.

20. Declaration

The Sule Lamido University Kafin Hausa, PMB 048, Jigawa State, Nigeria, hereby declares this Data Protection Policy, as the applicable guidance for management of data and compliance with extent data protection laws.

Signed and Stamped by

(The Registrar, SLUK)

This _____ day of _____ in the Year 2024

Signed and Stamped by

(The Vice Chancellor, SLUK)

This _____ day of _____ in the Year 2024