Dear

Freedom of Information Response (Our Ref: K/21/235)

Thank you for your Freedom of Information (FOI) request dated 14 May 2021, reference K/21/235. Please accept our apologies for the delay in providing your response.

Your request read:

“1. Please outline the training staff working in IT services and dealing with student request have on equality, diversity and gender identity.

Page 9 of Guidance to Support Trans staff and students says Some records can be changed at the request of the individual (HR/student records, e-mail, staff directory, occupational health etc) without a statutory declaration or deed poll needed. A written request i.e staff or student notification of change form is sufficient. Other records (for example University pension) can only be changed once a statutory declaration or deed poll has been received (see section 3.1). Under the Data Protection Act/General Data Protection Regulation (GDPR), trans identity and gender reassignment information constitutes ‘sensitive data’.

2. Please explain why university IT services have told several trans students that it is not possible to change their email address?

3. Please explain why when IT services make a decision such as email addresses and user names cannot be changed, they do not provide information about how to appeal this decision

4. Confidentiality is important to trans students, please explain how confidentiality about trans status is maintained if students are not allowed to change their email address or username?”

The University of Leeds holds information relevant to your request. For your convenience we have responded to each of your questions in turn below.

1. Please outline the training staff working in IT services and dealing with student request have on equality, diversity and gender identity. Page 9 of Guidance to Support Trans staff and students says Some records can be changed at the request of the individual (HR/student records, e-mail, staff directory, occupational health etc) without a statutory declaration or deed poll needed. A written request i.e. staff or student notification of change form is sufficient. Other records (for example University pension) can only be changed once a statutory declaration or deed poll has been received
(see section 3.1). Under the Data Protection Act/General Data Protection Regulation (GDPR), trans identity and gender reassignment information constitutes ‘sensitive data’.

IT staff are required to undertake the same training as other members of staff. This includes:
  • Introduction to Equality and Inclusion
  • Professional Behaviour and Relationships

2. Please explain why university IT services have told several trans students that it is not possible to change their email address?

The Freedom of Information Act gives you the right to request recorded information which you believe is held by an organisation. If the information you have requested is not recorded, the organisation is not obliged to make a record in response to your request.

The University of Leeds does not keep a record of individual responses to requests for email address changes (regardless of the reason for the change request). As such, we do hold any recorded information specific to this part of your request. However, we are able to provide some more general information, which we hope is helpful to you.

The University’s current identity management system has been in place for many years. It was originally designed in the late 1990s, and was put into production in the year 2000. The system was not designed with changes of this nature in mind, and in any case is now 21 years old, and due for renewal. Providing a new identity management system was identified as a key element of a programme of “Digital Enablement” which has recently been funded. A review of the requirements for this system has commenced and the need to be able to make changes which reflect a users’ identity (beyond the username) will be included in the mandatory requirements for the new system.

The current system uses the username as a “key” to an individual’s identity. As a result, the username is linked to many different systems in a manner that is extremely difficult to change. In practice this means that changing a user’s email address can have unexpected repercussions, e.g. locking them out of some systems. Attempts have been made to make this change in the past and has led to difficulties in maintaining the integrity of the users’ data across multiple systems.

As such, the inability to make changes to a users’ email address is purely due to practical limitations; it does not represent a university policy, nor does it reflect any ‘position’ on this matter.

Although the Guidance for Trans Staff and Students which you have referenced in your request refers to changes to email addresses, this is intended to demonstrate the difference between changes which, if they were to be made, would require a statutory declaration or deed poll, and those which do not. Changes to email addresses cannot be made due to the limitations of our system, but if changes were possible, the University would be permitted to make them without needing a statutory
declaration. We hope this explanation is helpful and apologise for any inconvenience as a result.

3. Please explain why when IT services make a decision such as email addresses and user names cannot be changed, they do not provide information about how to appeal this decision

As outlined above, the Freedom of Information Act entitles you to request recorded information which you believe is held by an organisation. This part of your request seeks an explanation, rather than recorded information. However, we can advise that, as set out above, usernames and email addresses are unable to be changed due to practical limitations. As such, there is no ‘decision’ to appeal against.

4. Confidentiality is important to trans students, please explain how confidentiality about trans status is maintained if students are not allowed to change their email address or username?

As outlined above, this part of your request seeks an explanation rather than recorded information. However, we can advise that the University fully appreciates this, and confidentiality considerations are being included in the requirements of the new identity management system.

We hope this information is helpful. If you have any questions about this email, however, please do not hesitate to contact us on foi@leeds.ac.uk

If you are unhappy with the service you have received in relation to your request and wish to make a complaint or request a review of our decision, you can request an Internal Review. Requests for Internal Review should be made in writing using the following contact information:

Post: Mr D Wardle
Deputy Secretary
The University of Leeds
Leeds
LS2 9JT

Email: foi@leeds.ac.uk

Requests for Internal Review should be submitted within 40 working days of receiving the University’s response to your request. Further information about how the University manages Freedom of Information requests and about our complaints procedure is also available on our website (www.leeds.ac.uk).

If you are not content with the outcome of the internal review, you have the right to apply directly to the Information Commissioner for a decision. Generally, the ICO cannot make a decision unless you have exhausted the review/complaints procedure provided by the University. The Information Commissioner can be contacted at: Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF.

Yours sincerely
Chloe Wilkins
Freedom of Information Officer

Secretariat
University of Leeds