

**Public feedback on the revised advisory guidelines relating to NRIC numbers:**  
**Submission by Singapore Management University**

**Background:**

Following the announcement of the public consultation on the revised guidelines relating to NRIC numbers, Singapore Management University's ("SMU") Office of Legal & General Affairs which is currently the Data Protection Officer of SMU posed the questions set-out below to some key offices within SMU. These offices are the Registrar's Office, Student Services Hub, IT Department, Office of Finance, Human Resource and Faculty Admiration, Office of Post Graduate Studies, Office of Alumni Relations, SMU Academy (which deals with Skills future courses) and the Executive Development Office. Below is a summary of the feedback provided by these various offices as well as the Office of Legal & General Affairs' feedback.

**Question 1:** What are your views on the proposed criteria for limiting the collection, use or disclosure of individuals' NRIC numbers or copies of the NRIC to instances where: (a) it is required under the law; and (b) it is necessary to accurately establish and verify the identity of the individual?

**SMU's Feedback:** SMU is supportive of this new proposed guidelines, in particular the overall objectives that the guidelines seeks to address.

The Commission should however take note that unlike some other legislation currently in force (E.g the Private Hospitals and Medical Clinics Regulations) which provide statutory rights/obligation (i.e law) to carry out proper documentation and accurate verification of patients and to have up-to date medical records, there is no such statutory right/obligation for SMU or for any autonomous university for that matter to carry out proper documentation and accurate verification of students, even though this in practice is a critical component of university operations. Therefore, SMU cannot rely on the first limb of the criteria and has to relay on the second limb instead.

Based on the exercise undertaken at SMU to obtain feedback from the various stakeholders, applying the second limb has led to many different interpretations as to what is "*...necessary to accurately establish and verify the identity of the individual*". Some units/offices are of the view that they need to collect NRIC data as it is "*...necessary to accurately establish and verify the identity of the individual ...*", whilst other units/offices are willing adopt alternatives methods of verification.

**Question 2:** What are your views on the proposed criteria for limiting the retention of individuals' physical NRIC to instances where: (a) it is required under the law; and (b) it is necessary to accurately establish and verify the identity of the individual?

**SMU's Feedback:** Please see response to Question 1.

**Question 3:** Are there common scenarios or additional issues (e.g. updating of information systems) that these advisory guidelines should address?

**SMU's Feedback:** In short yes.

As mentioned above, stemming from the internal feedback exercises undertaken at SMU, the interpretation of what is "*...necessary to accurately establish and verify the identity of the individual ...*", is subjective. It will be extremely helpful if the Commission can provide some guidance like a sector guidance for the university sector on what will generally be permitted to "*...accurately establish and verify the identity of the individual....*", and what would not be.

The Commission could also give some guidance in the event that a government agency requires the university to collect a copy of the NRIC of the students. For example, under the current Skillsfuture regime, SkillsFuture Singapore/Workforce Singapore imposes a contractual requirement (through a grant) on the university to collect copies of NRIC of the students who go through any Skillsfuture accredited programme in order for the students to be able to utilise the grant monies.

What about the situation when the Student Services Hub requires NRIC Data in case of a medical emergency?

It is also unclear what the situation will be for existing and past students. Existing students join SMU and stay for a period of 4 years. Past students data (alumni) are held by the university's registrar's office as well as the alumni office. SMU already has NRIC data of existing students in its systems. It is submitted that the new proposed guidelines should apply prospectively and not retrospectively as a retrospective application may not be feasible to be implemented.

Further to the above points which deals primarily with students NRIC data, there is very little guidance on collection, and retention of staff and faculty NRIC details, i.e HR matters. It would also be extremely helpful if the Commission can provide some guidance on this. For example for group corporate insurance policy renewal purposes, the respective insurers requires the university to obtain the NRIC data of all staff and faculty and to transfer the same to the insurers for their records and claims management purposes.

**Question 4:** What are your views on the proposed provision of up to one year from the issuance of the advisory guidelines for organisations to review and implement changes to their practices and processes involving the collection, use or disclosure of NRIC numbers or copies of the NRIC, or the retention of physical NRIC?

**SMU's Feedback:** This was the only question that drew a unanimous answer from the stakeholders. Because SMU's IT systems currently rely very heavily on student, staff and faculty NRIC data which is required for login in or other verification purposes, the new proposal will result in a material shift in operation/IT system changes. As a result the university requires a time frame of about 24 months to properly develop and implement the changes to its IT systems. The suggested 12 months period is too short to implement the changes.