



**Prifysgol Abertawe
Swansea University**

Gwasanaeth Lles
Wellbeing Service

**General Data Protection Regulation
Privacy statement
May 2018**

Policy Title: Wellbeing Service General Data Protection Regulation Privacy Statement
University Directorate: Student Services
Service: Inclusive Student Support Services (ISSS)
Department: Wellbeing Service

Reason for Policy: To ensure compliance and clarification to individuals under the General Data Protection Regulation (GDPR) 2018

Date reviewed: May 2018
Next review due: May 2019

Date approved: 24/05/2018
Approved by: E.Stratton (Head of Inclusive Student support Services)

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Wellbeing Service Privacy Notice

The Student Wellbeing service provides support for enrolled Swansea University students experiencing distress arising from psychological, emotional; or mental health issues. We work alongside a range of partners including the NHS, charities and local support services and agencies to provide services and support for students.

The Wellbeing Service is part of the Inclusive Student Support services (ISSS) Group, which is part of Student Services within Swansea University. Swansea University is responsible for the collection and processing of personal data including data defined as sensitive. As such, Swansea University is the data controller and is committed to protecting the rights of individuals in line with the UK Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR)(2018). Swansea University has a Data Protection Officer who can be contacted through email on: dataprotection@swansea.ac.uk

We take the collection, storage and use of personal data very seriously. In this document, you will find an explanation of why the Wellbeing Service collects individual data, how we process it and the steps we take to ensure data security at all stages.

What kind of information do we collect?

We collect the following information from individuals accessing the Wellbeing Service, for advice, support, intervention, supervision, mentoring, participation in group activities and other activities the service may offer.

- Name;
- Student Number;
- Date of birth;
- Gender;
- Contact details;
- The name and contact details of an individual's General Practitioner (GP);
- The name and contact details of any other individuals/professionals providing support;
- Details of the reasons for accessing the Wellbeing Service and, any previous diagnosis relevant to this;
- Source of introduction;
- Medical and Health related information;
- Disability, medical evidence, psychiatric, educational psychologist and needs assessment reports;
- Whether an individual is in receipt of Disabled Student's Allowance, and if so, the reason it was awarded.

Why we collect individual data

Our legal basis for processing personal data is that an individual will have given consent to the processing as part of a signed consent statement on the personal details form completed when approaching the Wellbeing Service for support. Data may be used as part of regular audit and quality control of our services, for training purposes, as part of clinical research, clinical and non-clinical supervision of staff and, in order to provide accurate wellbeing assessments and interventions.

Any information provided will only be used for the purpose for which consent has been obtained. Individuals will be asked to give separate consent for every data processing activity that is undertaken or if disclosure is required outside of Wellbeing Services/Inclusive Student Support services (ISSS.) In extremely rare circumstances we may have to reveal information to others e.g. when an individual is at risk of serious physical harm or death, a child is in danger, another student has committed a crime against an individual or acts of terrorism are being planned. Should such a need arise to disclose information, in the majority of circumstances we would discuss directly with the individual making the disclosure when we need to do this.

How your information will be used

1. In order to provide appropriate support; the details submitted and discussed with any staff member will be safely recorded for use in future sessions. The information we collect will enable us to make decisions and recommendations to Academic College's and, potentially other services e.g. Residential services, Central admissions, Swansea University Occupational Health department and other Student Services teams.
2. The information provided will also help us assess, plan, deliver and evaluate interventions.

3. The Wellbeing Service may be required by Swansea University to produce statistical information which is generated by our computerised records systems. Research may also be carried out on statistics that are created by our work with individuals. All data and research information presented to anyone outside the Inclusive Student Support Services (ISSS) group will be anonymous, in order to preserve individual confidentiality.
4. For the purposes of; safeguarding, promoting the welfare of student's and maintaining student safety and security.
5. For the purposes of monitoring; which allows us to fulfil compulsory external auditing and reporting requirements to regulatory bodies such as DSA-QAG, and HEFCW.
6. To help Wellbeing staff run its' services effectively and to continuously improve what we do.

How data is processed

- i. To access the Wellbeing Service, enrolled Swansea University students are asked to complete and return a personal details form or questionnaire specific to the service being requested either in person, by post, or via email.
- ii. This form is stored in a students' specific folder on a secure shared drive and, the data may be typed-up into a secure spreadsheet and notes made on a student specific Microsoft Dynamics CRM file, which can only be accessed and viewed by authorised personnel.
- iii. All files containing student data and information are stored in the relevant secured service file area. Access to these areas files is restricted to members of the relevant team and, on occasion, designated staff working within the Inclusive Student Support Service (ISSS) group.
- iv. Information shared with other teams and departments within Swansea University, for the purpose of providing a service to individuals will only be shared once consent has been provided to us either verbally or in writing.
- v. Data shared with external partners and organisations, for the purposes of providing a service to individuals will only be shared once explicit consent has been provided to us in writing.
- vi. We will not respond to requests from tutors/academic or administration staff, family members or friends for information, not even disclosing attendance or engagement with the Wellbeing Service (unless explicit consent has been obtained to do so.)
- vii. In extremely rare circumstances we may have to reveal information to others without consent, please see the "why we collect individual data" section above for further details about this.

How long will your information be held?

The Wellbeing Service will retain personal information in line with the University records management procedure which can be found at <http://www.swansea.ac.uk/the-university/world-class/vicechancellorsoffice/compliance/recordsmanagement/>

Any information concerning an individual's disability / specific need / medical condition provided to us will be held securely for 7 years and thereafter will be destroyed unless we have had a specific request via the University's data protection officer.

Security of your information

Data protection legislation requires us to keep individuals information secure. This means that an individual's confidentiality will be respected and, all appropriate measure will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all of the information we hold will be authorised to do so. Information about individuals in electronic form will be subject to password and other security restrictions, while paper files will be stored in a secured area with controlled access.

Some processing and storage may be undertaken on the University's behalf by an organisation contracted for that purpose. Organisations processing personal data on the University's behalf will be bound by an obligation to process personal data in accordance with Data Protection legislation.

What are your/an individual's rights?

Individuals have a right to access their personal information, to object to the processing of their personal information, to rectify, to erase, to restrict and to port their personal information. Please visit the University Data Protection webpage for further information with regards to your individual rights. <http://www.swansea.ac.uk/the-university/world-class/vicechancellorsoffice/compliance/dataprotection/dataprotectionatswanseauniversity/>

Withdrawing Consent

Individuals have the right to withdraw consent at any time. If for any reason individuals wish to withdraw consent, we ask that this request is submitted in writing to the Wellbeing Service, Swansea University, Horton House, Singleton Park, Swansea, SA2 8PH or via email to; wellbeing@swansea.ac.uk Individuals will be asked to complete a Request to Withdraw Consent form and return it to the service in writing, so we can ensure that individuals understand what is meant by withdrawing consent and what will happen next.

Any other requests or objections should be made in writing in the first instance to:-
University Compliance Officer (FOI/DP,) Vice-Chancellor's Office, Swansea University, Singleton Park, Swansea, SA2 8PP Email: dataprotection@swansea.ac.uk

How to make a complaint

If an individual is unhappy with the way in which personal information has been processed individuals may in the first instance contact the University Data Protection Officer (FOI/DP,) Vice-Chancellor's Office, Swansea University, Singleton Park, Swansea, SA2 8PP Email: dataprotection@swansea.ac.uk

If an individual remains dissatisfied then they have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF www.ico.org.uk

Further questions?

If you have further questions about how we process individual monitoring data, please feel free to get in touch with Gareth Evans, Coordinator of Administration and Quality on gareth.evans@swansea.ac.uk or 01792 29 5756.