

Student Development and Well-being Data Processing Summary



Who we are and how we use your personal data

Student Development and Well-being is the central hub for well-being and disability support services at the University. It is made-up of the following support services: Counselling, Mental Health and Well-being, Learning Support (disability) and the Student Well-being Officer. We collect and process personal data in order to provide support services to students.

What is personal data and what type of information is collected from you?

Personal data means any information that relates to or identifies you as an individual.

Depending on individual circumstances, it may be appropriate for our teams to collect and process either personal data, special category data or both from students.

- **Personal data** relating to a student can include: name, date of birth, address details, home telephone number, private email address, emergency contact, student number, GP/medical practitioner contact details, passport data, immigration details, etc.
- **Special category data** relating to a student can include: racial and ethnic origin, physical and mental health details, disability, welfare/well-being related information, religion, etc.

Where we obtain your personal data from

Student Development and Well-being may access personal and or special category data via the following sources:

- From details you provide to the University when applying/registering with us as a student
- From details and information you provide to Student Development and Well-being when accessing support services
- From third party sources (e.g. UCAS, Disability Needs Assessors and external support providers, GP/medical practitioners, other university personnel such as lecturers, Residential Life and Chaplaincy Teams)

What personal data will be processed and how it will be used

The information students provide to Student Development and Well-being may include both personal and special category data. We will create, store and transmit such data securely in a variety of ways including electronic and paper formats. Student Development and Well-being will use the data in order to provide assistance and support services to students. This may include any of the following examples:

- The provision of counselling, mental well-being, disability assessment and/or support
- Arranging support services on behalf of students (e.g. Disabled Student Allowances, government funded disability support, dyslexia assessments, health screenings, etc.)
- Creating a Learning Support Plan (LSP) and once approved, sharing this with the student's lecturers and other staff involved in their teaching and learning
- Arranging initial health screening assessments (Initial teacher training, Social Work, Sports Rehabilitation programs)
- Safeguarding and promoting the safety, welfare and well-being of students
- Referring/signposting students to other university services (e.g. Student Finance, Exams, Student Administration)
- Seeking feedback from students
- Promoting/providing information about university well-being services to students
- Processing complaints from students

Lawful Processing

When accessing university support services, some of the information you provide to Student Development and Well-being is likely to be classified as special category data. Depending on the nature of the service being provided, the well-being service teams will normally rely on two different legal basis for processing such data.

Processing personal data is necessary for these teams to provide a service that benefits you; therefore, they have a legitimate interest to process this data. The teams will usually also rely on explicit consent from you (the data subject) in order to process any special category data you disclose. (Appendix 2 provides further information on reasons for processing data)

The right to withdraw consent

You have the right to withdraw your consent at any time by simply contacting Student Development and Well-being and advising of your intention to withdraw your consent. Please be advised that withdrawing consent is likely to significantly impact on the assistance university well-being support services are able to offer.

In certain high-risk circumstances, processing and sharing data without explicit consent may be necessary to protect the vital interests of the data subject or other person(s), where the data subject is physically or legally incapable of giving consent.

Who has access to your information?

The relevant staff within Student Development and Well-being will have access to your personal and special category data. With your consent, information may also be shared with other university staff where necessary, on a need to know basis. We will always endeavour to let you know whom we will share information with. On occasion, when an appropriate third party requires information, where we have your consent to do so, limited information may be shared in order to provide you with the required service and/or support.

How long is your information kept for?

Student Development and Well-being will normally hold the personal data you provide for a period of 6 years following your year of graduation or withdrawal from the University but in some cases, data retention periods may differ. (Appendix 1 provides further information on data retention).

Where can I find out more?

For further detailed privacy information, please refer to the relevant University Privacy Notice.

<https://www.hope.ac.uk/aboutus/governance/generaldataprotectionregulations/privacynotices/>

Student Development and Well-being Data Retention Schedule

Type of data/record/ processing activity	Data retention period	Action at end of retention period
Student Counselling Student support records/ case files/drop-in data	Six years after the academic year in which the student accessed the service.	Destroy/delete records
Mental Health Support Student support records/ case files/medical information/drop-in data	Six years after the academic year in which the student accessed the service.	Destroy/delete records
Learning Support (disability) Student support records/ case files/medical information/Learning Support Plans/ drop-in data	Six years following student graduation/ withdrawal from the University.	Destroy/delete records
Initial Health Questionnaire (Initial Teacher Training/Social Work/Sports Rehabilitation)	University: Six years after the academic year in which the health questionnaire was completed. LHU external OH provider: Six years after the academic year in which the initial screening/ health assessment was carried out.	Delete questionnaire records Review and if no longer required, destroy
Occupational Health Reports (Initial Teacher Training/Social Work/Sports Rehabilitation)	University: Six years after the academic year in which the health assessment was carried out. LHU external OH provider: Ten years after the academic year in which the health assessment was carried out.	Delete questionnaire records Review and if no longer required, destroy
Educational Psychologist assessment booking/payment	Up to seven years following online store transaction (Finance Dept.)	Delete records
Well-being services drop-in data.	Six years following student graduation/ withdrawal from the University.	Delete records
Data relating to the processing of formal complaints	Six years following student graduation/ withdrawal from the University.	Delete records
Student experience survey feedback data	Survey Results data: Until superseded, or 2 years, whichever is sooner.	Delete records

Overview of Reasons for Processing Data

Specific Purpose	Category of Data	Legal Basis	
		Article 6 Personal Data	Article 9 Special Category
Provide counselling/mental Health assessment and ongoing support services to students	Personal and Special Category data (e.g. name, address, DOB, gender, contact details, GP details, information regarding disability, physical/ mental health, etc.)	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service. or 6(f) The processing is necessary for the legitimate interest of SDW in order to provide the support/service requested by and/or of benefit to the data subject.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested support/service.
Provide disability/health/ accommodation assessment and support	Personal and Special Category data (e.g. name, address, DOB, gender, contact details, GP details, information regarding disability, physical/ mental health, etc.)	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service. or 6(c) The processing is necessary to comply with the law related to obligations under the Equal Act. or 6(f) The processing is necessary for the legitimate interest of SDW in order to provide the support/service requested by and/or of benefit to the data subject.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested support/service.
Arranging SpLD assessments	Personal and Special Category data (e.g. name, address, email address, disability, physical/mental health, etc.)	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested support/service.
Respond to student emergency well-being/ safeguarding situations	Personal and Special Category data (e.g. name, address, DOB, gender,	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service.	9(c) The processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is

	contact details, information regarding disability, health, GP details, etc.)	or 6(c) The processing is necessary to comply with the law surrounding duty of care/safeguarding obligations or 6(f) The processing is necessary for the legitimate interest of SDW in order to provide the support/service requested by and/or of benefit to the data subject.	physically or legally incapable of giving consent.
Initial occupational health screening/ assessments/ reports. *(Initial Teacher Training /Social Work/Sport Rehabilitation/Nutrition programmes only)	Personal and Special Category data (e.g. name, address, DOB, gender, contact details, information regarding medical history, disability, health, etc.)	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service. or 6(e) The processing is necessary for the performance of a task in the public interest.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested support/service. or 9 (h) processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the student.
Processing complaints	Personal and Special Category data (e.g. name, address, email address, information regarding basis for complaint)	6(b) The processing is necessary as part of the contract with the data subject to deliver the requested support/service. or 6(f) The processing is necessary for the legitimate interest of SDW in order to provide the support/service requested by and/or of benefit to the data subject.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested support/service.
Provide counselling placement and supervision to volunteers	Personal and Special Category data (e.g. name, address, gender, contact details, education/ employment history, information regarding disability, health/mental health, professional development/progress professional body membership, etc.)	6(b) The processing is necessary in order to fulfil the obligations of our agreement with the data subject to provide the requested counselling placement and accompanying supervision.	9(a) The data subject has given explicit consent to the processing of those personal data for one or more specific purposes required in order to provide the requested placement and to monitor their counselling practice/progress.