



Data Protection: Layered Privacy Notice Wellbeing and Inclusion Services

Edinburgh Napier University provides this information to explain how we use your personal data. Protecting your personal data is important to us and we only collect and process data which is necessary for us to provide the information, services and goods you require. This is in compliance with UK data protection legislation (“the legislation”), that is, the UK Data Protection Act 2018 (“DPA 2018”) and the General Data Protection Regulation: EU 2016-679 (“GDPR”) as amended by “EU Exit” Regulations 2019 and now known as the UK GDPR.

Introduction to the Service

The University Wellbeing and Inclusion team provides integrated student support services for the purposes of:

- Counselling and Mental Health Support
- Disability and Inclusion Support
- Student Funding Support
- Keep On Track Support
- Safeguarding

We provide a dedicated and confidential Counselling Service to students to provide support and work with students towards resolving any problems or difficulties being encountered whilst studying at the University.

We also provide support to students with disabilities, specific learning difficulties and long-term health conditions. We process personal data to provide students with support, across the University and through selected external agencies, and ensure that the necessary adjustments are made to facilitate your studies and student experience. We might also use your information to help us respond to our wider duty of care towards you as one of our students. That includes us considering your overall safety and welfare.

Our services also include a Student Funding service that offers support and advice to students in financial difficulty. We process personal data to assess funding applications, identify funding sources and to give budgeting advice.

Our Safeguarding service responds to referrals of students at risk or who have complex welfare concerns. The team works with teams across Professional Services and Schools, as well as with external agencies, to coordinate support around vulnerable students.

The Keep on Track service we offer is for students who may be thinking about leaving university or are at risk of leaving. It provides a triage service for students who may require multiple supports put in place in response to concerns relating to academic and/or wider welfare issues. A Keep on Track adviser will case manage and coordinate students’ needs in support of success and retention. For those who decide they want to leave, support will be provided to the student through this process.

Why are we collecting it/what we are doing with it (purposes)?

We collect your data so we can provide you with the service/s. Our purposes include:

- for clinical and therapeutic purposes
- to assess risk
- to arrange the provision of support
- to arrange necessary adjustments, where appropriate
- to process applications for funding
- for administrative, statistical and planning purposes

Activities and processing being undertaken:

The Wellbeing & Inclusion Department work alongside other University support teams – where necessary we share information with each other to offer you the best quality of holistic support and for administrative and statistical purposes. Examples include of this include:

Counselling and Mental Wellbeing Services

- Clinical and therapeutic purposes
- To manage student wellbeing, concern and risk

Disability Inclusion Services

- Collecting personal data to enable us to offer support and make necessary adjustments
- Sharing information with lecturers, with other university support services and with university student accommodation services, as necessary and appropriate.
- Sharing information with agencies providing assessed course placements.
- Referrals to outside agencies for on-going support.

Keep on Track Services

- Provision of student retention services
- To manage student wellbeing, concern and risk

Student Funding Services

- To process your application for funding
- Provision of advice, assistance and support
- Administration of university and other funding awards to address student financial hardship

Annual Wellbeing and Inclusion Survey

- Information is collected in order to evaluate the services provided by Wellbeing & Inclusion, assess whether policies and practices are equitable and fair and do not disproportionately affect different groups. We act on the feedback you give us and use it improve the student services provided by Wellbeing & Inclusion

Who are we sharing your Personal Data with?

The Wellbeing & Inclusion Department work alongside other support teams and where appropriate we may share information with each other to offer you the best

quality of holistic support. We also use some externally provided systems where personal data is processed by the system, but the company is not required to routinely access or process personal data. Depending on the services you have requested or been referred to, this may include:

Counselling and Mental Wellbeing Services

- CORE Management is the electronic system which the University's Counselling and Mental Wellbeing team uses to process information required to provide their services. It is a system management data base, which holds personal information, contact details and evaluation systems.
- Wellspring Scotland - data exchange for Safeguarding and payment purposes.
- TogetherAll general use requires no sharing of personal data (staff and students can register individually with TogetherAll online to use their service paid for by the University).

Disability Inclusion Services

To arrange your support, we may need to share information about you, including:

- Information about support you might need for classes and coursework: primarily lecturers and your School Disability Contact.
- Information about support you might need for tests and exams: primarily lecturers, your School Disability Contact, the exams team.
- Information about safety measures we might need to take: including health & safety team, lecturers, your School Disability Contact.
- Information about support you might need in student accommodation: including student accommodation team, health & safety team.
- Information to support your application for Disabled Students' Allowance: including your student funding body (SAAS, SFE, SFNI, SFW) and the access centre carrying out your needs assessment.
- Information to support your application for the Fund for Students with Disabilities: primarily the Higher Education Authority.
- Information about your additional support requirements: external agencies providing specialist one-to-one support workers, including Non-Medical Personal Help Agencies (NMPH Agencies), etc.
- Information about support you might need on work placements: placement supervisors, placement providers, your School Disability Contact, etc.
- Information about support you might need on overseas study opportunities: Global Mobility team, host institution, etc.
- Information about your general welfare or safety: primarily colleagues in the Wellbeing & Inclusion department, Director of Student Services & Academic Registrar.

Keep on Track Services

Access to your information will be restricted to Wellbeing and Inclusion staff. It will only be shared with other University professional services, staff and external support agencies, where required, to provide the service you have requested.

Student Funding Services

Access to your information will be restricted to staff in the Wellbeing and Inclusion team. It will only be shared with other University professional services and staff /

partner organisation(s) and external funding providers, principally charitable trusts, where required to provide the service you have requested.

Where you are applying for funding provided by an organisation external to the University you are advised to check their Privacy Notices for information about how they process your personal data.

Annual Survey

In relation to data collected in the Wellbeing and Inclusion annual survey, we do not share any personal data with external parties, however we may use any comments you provide anonymously in our reporting and publicity.

The University undertakes to maintain your information securely and will restrict access to employees, our professional advisers, authorised agents and contractors only where relevant and necessary. We will only disclose your data to external third parties (other than any specified above) where we:

- Have serious cause for concern for your safety.
- Are required to do so under a statutory or legal obligation, or
- Are permitted to do so by Data Protection legislation
- Please see our legal bases section for more information

Please note:

- The list above is not exhaustive
- The Counselling and Mental Wellbeing service works to a rigorous code of confidentiality and will not pass on any information regarding your Counselling or mental health advice unless in exceptional circumstances that includes significant risk to self or others (please see Counselling and mental health advice contract/agreement). The Counselling service is guided by the British Association for Counselling and Psychotherapy ethical guidelines. You can view the BACP ethical framework at:
http://www.bacp.co.uk/ethical_framework/ethics.php

What is the legal basis for processing?

Services are provided by the University's Wellbeing and Inclusion team on the request of individuals (data subjects) or where we recognise that a proactive service is required in cases of high academic and personal risk.

The legal bases for processing under the UK GDPR are:

- Article 6.1 (c) – for compliance with a legal obligation, principally the Equality Act 2010, but also including other legislation, such as the Modern Slavery Act 2015, “Prevent” legislation, etc.
- Article 6.1 (d) – to protect the vital interests of the data subject or other individual.
- Article 6.1 (e) – for the performance of a task carried out in the public interest or in the exercise of the official authority vested in the controller, namely the University's [Statutory Instruments](#): “for the objects of providing education, carrying out research, and promoting teaching, research and general scholarship” and the administration and support thereof, which includes

ensuring support is provided and adjustments are made where appropriate to facilitate the provision of the objects.

- Article 9.2 (g) - as permitted by under section 10(3), and Schedule 1, of the Data Protection Act 2018 for the processing of special category (sensitive) personal data for the purposes:
 - Part 1(2) – Health or social care purposes
 - Part 2(6) - Statutory purposes (see 6.1 (e) above)
 - Part 2(8) – Equality of opportunity or treatment
 - Part 2(16) – Support for individuals with a particular disability or medical condition
 - Part 2(17) – Counselling, etc.
 - Part 2(18) - Safeguarding of children and of individuals at risk
- Article 9.2 (h) – for the purposes of the provision of health systems and services. The University adheres to the code of ethics of the British Association of Counsellors and Psychotherapy (BACP).
- Article 9.3 – personal data may be processed under this condition when the data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy by UK law or by rules established by BACP (British Association of Counsellors and Psychotherapy) and COSCA (Scotland’s professional body for Counselling and Psychotherapy).
- Article 6.1 (a) and Article 9.2 (a) – consent. The University may rely on consent where it is specifically required by external partners for the purposes of making a referral or in other similar circumstances. Generally, we rely on other legal bases, as set out above. It is standard practice for the W&I colleague involved to discuss the proposed referral with the potential/student prior to the referral taking place to ensure that they understand and agree with the proposed action. There are circumstances where it is not possible to have a conversation prior to a referral e.g. in an emergency situation, but W&I colleagues are always acting in the best interests of the potential/students whom they support.

How are we collecting this information?

The Wellbeing and Inclusion team gather your information through a variety of means including:

- Information will be collected from you, either through your direct involvement, e.g. during appointments, form or assessment completion or indirectly, e.g. using information already gathered from yourself and held on the University’s record systems.
- Additional information will be collected from partner agencies, including Educational Psychologists, the Edinburgh College Access Centre and personal support providers, to which we might refer you.
- For the Wellbeing and Inclusion annual survey, we will collect the information online using Microsoft Forms.

What information are we collecting (whose information and what type of personal data)?

We collect information from students and prospective students of Edinburgh Napier University accessing Wellbeing and Inclusions services.

The range of information we collect includes:

- Name, contact details, address, date of birth, matriculation number, course information, GP details, reason(s) for accessing service and a range of demographic data to ensure that we are providing effective access to services.

This data includes:

- Gender, ethnicity, age and disability status for equalities monitoring.

In addition to the information above specific services collect additional relevant data, as follows:

Counselling and Mental Wellbeing Services

- Clinical data, CORE wellbeing psychometric test, pre and post assessment, session, risk and concern notes, services accessed.

Disability Inclusion Services

- Data specifically relating to you, your disability/SPLD/health condition(s), and any associated support needs.

Student Funding Services

- Data specifically relating to you and your financial circumstances, and those of your household/parents where appropriate.
- When providing the personal/financial data of family members/others please ensure that you have their permission to do so.

Additional data may be collected where this is relevant to your specific situation, in order for Wellbeing and Inclusion colleagues to provide you with the support that you require.

Annual Survey

Whilst it is not mandatory for you to participate in the survey, we would be grateful for your feedback to assist us with understanding your perspective and experiences to ensure we are providing the support that you and your peers require.

- We only collect your name and email address if you wish to take part in the prize draw and/or are willing to take part in a student focus group and/or you wish to discuss the topics in the survey further.
- Core questions include: which school you are in, which W&I services you've used, the campus at which you access them, whether you thought about leaving the University before accessing the services, and whether the support you received made you more likely to continue your studies.
- Optional questions for equality monitoring purposes include special category data, including disability, sexual orientation and ethnicity. However, you can choose not to answer these questions.

How long is your information kept?

Most services within Wellbeing and Inclusion will keep information for a period of 6 years after completion of studies. However, the Counselling and Mental Wellbeing service will keep information for 10 years from the date users first accessed the service.

Information relating to the Wellbeing and Inclusion annual survey will be kept for 1 year from the date of collection.

Further information can be found online at:

<https://staff.napier.ac.uk/services/governance-compliance/governance/records/Pages/RecordsRetentionSchedules.aspx>

How secure is your information?

The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy of your personal data.

The University also makes use of a number of third party, including “cloud”, services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation.

For more information please see our information online here: [Cyber Security \(napier.ac.uk\)](#)

Who keeps your information updated?

- Students using our services are responsible for either updating their student record through the self-service portal or, where necessary, advising staff of changes to their personal data and/or circumstances to ensure their record is accurate.
- Wellbeing and Inclusion colleagues will update as/ if necessary.
- Where we work with external agencies, they are responsible for ensuring information is kept up to date.

Will your information be used for any automated decision making or profiling?

No

Is information transferred to a third country? Outside the UK, EEA and not included in the adequate countries list.

No

Is any other information available?

*This information is provided to supplement the University’s main Privacy Notices and it is recommended that appropriate notices are reviewed to provide full information about how the University processes personal data.

You can access all the University’s privacy notices using the following URL:

<https://www.napier.ac.uk/privacy-policy>

*You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL:

<https://www.napier.ac.uk/privacy-policy>