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University of Wolverhampton

Student Support and Wellbeing

Privacy Notice

Who we are

The University of Wolverhampton (‘we’ or ’us’) are a ‘Data Controller’ for the purposes of the Data Protection Legislation (including the Data Protection Act 1998 and the General Data Protection Regulation) and we are responsible for, and control the processing of, your personal information.

Your Privacy

We are committed to protecting your privacy. This notice explains how the University and Student Support and Wellbeing (hereafter ‘SSW’) collect and process your personal information.

We collect and process your personal data for the purposes of providing, funding and auditing student support services.

SSW provides a range of support services including services for disabled students or students with a specific learning difficulty (hereafter ‘SpLD’); mental health and wellbeing support services; Chaplaincy services; and, Funding and Financial support.

Information We Collect

We obtain personal information about you from the following sources:

1. Application processes:
   1. Upon registration, if you disclose a disability, SpLD or mental health condition, your personal information will be transferred from the University’s central database(s) to our local SSW database. We will contact you by email and invite you to share information about your disability, SpLD or mental health condition for the purposes of discussing your support needs and support services available to you at the University. Depending on your specific needs, we may call you to invite you to discuss your support needs with us.
2. Documents you complete and/or share with SSW which may contain Personal and/or sensitive information include (but not be limited to):
3. SSW Self-Declaration Form (paper or online form).
4. SSW Further Information Forms (information you provide about your Disability, SpLD, mental health condition).
5. Documentation providing evidence of your disability, SpLD or mental health condition, including (but not limited to) emails you send us, Needs Assessment Reports, Educational Health and Care Plans, diagnostic reports or medical evidence.
6. Documentation relating to your application for Disabled Students’ Allowances (hereafter ‘DSA’) funding (where applicable)
7. Documentation relating to applications for Funding or Financial Support including applications to the Dennis Turner Opportunity Fund (hereafter ‘DToF’) which includes personal financial records.
8. Personal information shared by you which is provided as part of discussions or meetings with a member of the SSW team (face to face, by telephone or by email) which may be recorded as meeting notes.
9. Completion of surveys providing feedback on SSW services
10. Third party sources:
    1. For the purposes of administering DSA funded support, third parties, including Needs Assessors and Funding Bodies, will provide the University with personal information including information about your disability, SpLD or mental health condition. This may be in the form of Needs Assessment reports, DSA funding agreement letters, emails, face to face meetings or telephone. This information is shared only if you have provided your agreement directly to the Third Party. This information is used to provide you with DSA funded support or to ensure the University has information to help us to support you to access your University studies.
    2. DSA and University funded Non-medical Help (NMH) provided by the University is administered using ‘Connect’. This is a secure data processing system managed by a third party, Clearlinks. If you are provided with NMH support by the University you will be asked to set up a secure Connect account to enable you to approve the support you receive and to provide us with feedback. Connect data includes your name, course details, details of your individual support needs and the NMH support provided, for example a BSL Interpreter or specialist note-taker.
    3. DSA- funded support can be provided a range of NMH providers. It is your responsibility to contact the relevant NMH provider/s and arrange for support to be set up. This includes if you have been awarded technology or technology training. With your permission, we will share the information about your DSA funded support with the relevant NMH provider so that they can process this information and ensure they are ready to agree your support with you. You will also be asked to agree with the NMH provider how they will process your information when they set up your support.
    4. Schools, colleges, Universities, local authorities including social services and mental health care services, and other organisations or agencies who have or continue to provide you with support services relating to your disability, SpLD or mental health condition may share, with your permission, information with regards to your support needs.
    5. You may also nominate a named third party with whom you give us permission to discuss your support or share information about support services, for example a parent, family member, carer or advocate. This person must be nominated by you and you will be asked to confirm contact details.

We may process the following personal information about you:

1. your title, full name (including former name or alias), gender, date of birth;
2. your education record (Degree and Award details, Year of study and graduation);
3. your contact information (home/term time address, telephone number(s), email address);
4. your financial information (including your bank/building society details);
5. information available through the media or the world wide web;
6. your family/next of kin details, including your parent, spouse/partner; and/or
7. other information you share with us.

Personal information we collect about you may include “special categories” data, such as information about your racial or ethnic origin, religious or other beliefs, physical or mental health and criminal offences/proceedings. “Special categories” data would only be processed where you have provided it yourself (with your consent), for example during discussions with any of our representatives or where such is recorded for the purposes of assessing accessibility requirements arising as a result of a disability, or where this information has already been made public or processing is required by law.

The University of Wolverhampton uses cookies to improve the content and experience of its website users, but rest assured that these do not allow for us to identify you personally. More information on how to manage cookies can be found [here](https://www.wlv.ac.uk/about-us/governance/legal-information/cookies/).

How We Use Your Data

The SSW department is here to provide you with support or information about the support services you may need to access during your studies. We understand that this information may be personal and sensitive. Please be assured that we request and process personal information to enable us to deliver these services. We also use data to better understand the needs of our students so that we can work with you to support you and to improve our services.

We may process your personal information for the following purposes:

1. Administrative purposes:
   1. to contact you to request information about your disability, SpLD or mental health condition
   2. event registration;
   3. to provide non-medical health (NMH) support (for example support provided to you including BSL Interpreter, note-taker, small group skills workshops)
   4. to arrange for you to access our mental health and wellbeing services, for example to set up and invite you to a wellbeing meeting.
   5. to keep a record of communications between us, including any mental health, wellbeing or counselling interventions;
   6. to invoice for externally funded DSA funded support
   7. to comply with DSA-QAG (Disabled Students Allowances Quality Assurance Group) audit requirements of DSA funded NMH support.
   8. to provide and monitor DSA or University Funded Non-Medical Help (NMH) support using a secure, externally hosted system ‘Connect’ managed by Clearlinks.
   9. to assess your eligibility for funding and financial support (‘hardship funding’)
   10. to communicate with members of the University community or external third parties for the purposes of providing support.
   11. other purposes that may arise in the provision of support services.
2. Communications

We may, in order to discuss your support or funding for your support, contact you by email, post or telephone to pursue the purposes mentioned above and in particular for the following reasons:

* 1. To agree NMH support to which you are entitled
  2. To request you comply with the administration and audit requirements of DSA or University funded support provided by the University which are managed via our externally hosted ‘Connect’ system; you will be required to set up a ‘Connect’ account in order to access support provided by the University.
  3. To seek feedback on our support services
  4. To arrange wellbeing support
  5. To complete Funding and Financial Support applications

If you would like to opt-out of the above Communications, please let us know. See ‘How to Contact Us’ below for further information. However please be advised that by opting out of the above Communications the University will not be able to provide you with University or DSA funded support. The above data processing is a requirement to ensure that support is planned, provided, audited and funded.

Who your information may be shared with

Your personal information is:

* Held on the University SITS system in eVision. This information is processed by the SSW administration team and accessed by relevant SSW staff including Disability Advisers.
* Held as casenotes made during direct communication with you in the form of meeting or mental health and wellbeing intervention notes; which may be stored securely as paper records and/or stored on the SITS system in eVision.
* Held on the SSW iDrive accessed by the SSW administration team and by relevant SSW staff including Disability Advisers.
* Shared in communication with internal and external services as appropriate with the purposes of providing SSW support services.
* Shared in communication with NMH providers as appropriate for the purposes of supporting you to access your DSA-funded NMH support.
* For students in receipt of DSA or University Funded Non-Medical Help (NMH) support and whose information is stored on the ‘Connect’ system, information will be processed by the ‘Connect’ administration team and by SSW.
* Communicated to relevant faculty, academic and registry staff for the purposes of providing support.
* Communicated to the relevant faculty, academic and registry staff in the form of a Tutor Awareness Sheet (TAS) which includes details of support strategies and details of any special examination arrangements to which you may be entitled.
* Shared as a part of the internal and external auditing of DSA or University Funded Non-Medical Help (NMH) support. This includes the annual audit of Student Finance England (SFE) funded DSA support which is overseen by the DSA-QAG.
* We may disclose your personal data to other companies within our group, third parties working in partnership or on behalf of the University, and/or Government Agencies where required to do so by law.
* We may disclose your personal data where we have reasonable concerns about your personal wellbeing for the purposes of safeguarding. This information may be shared without your permission where we have reasonable grounds that your personal wellbeing or the wellbeing of others is at risk. This may include, but may not be limited to, contact with emergency services, NHS services, local authorities services, your emergency contacts e.g. parent, carer or guardian.

We do not transfer your personal information to third parties outside the EEA or to territories without adequate levels of protection, for example if we are communicating information about your support needs with one of our International settings. Where personal data is processed by a third party, we take reasonable steps to ensure that the data is processed strictly according to the instructions of the University, for the relevant purposes only and securely destroyed or returned upon completion/termination. We take reasonable steps to ensure that third party processors are subject to written legal obligations in respect of data protection and the duty of confidentiality.

We do not sell or rent any personal information or data supplied by you. We may compile aggregate statistics and provide them to third parties, but we do not include personal information that identifies individual users.

Retention

SSW may retain your personal information for:

* Disability, SpLD or mental health condition support: ‘End of relationship (course completion) + 3 years
* Financial records: 7 years
* Counselling or wellbeing intervention records: 5 years
* All other data is maintained in line with our statutory/regulatory obligations [where appropriate.]

If you wish to request for any of your records to be removed from database, or would like to opt-out of any or all communications from the University of Wolverhampton, please see ‘How to Contact Us’ and ‘Rights of Data Subjects’ below for further information.

Rights of Data Subjects

1. Right to request a copy of your information

You can request a copy of your information which we hold (this is known as a subject access request). If you would like a copy of some or all of it, please visit the University of Wolverhampton Data Protection web pages available [here](https://www.wlv.ac.uk/about-us/governance/legal-information/corporate-compliance/data-protection/data-protection-subject-access/).

1. Right to correct mistakes in your information

You can require us to correct any mistakes in your information which we hold free of charge. If you would like to do so, please write to us (see ‘Contact Us’ below) and provide us with enough information to identify you, as well as, inform us of the information that is incorrect and what it should be replaced with.

Lawful basis for processing

The University may rely on one or multiple grounds for processing your personal data including:

1. You have provided consent for the processing;
2. There is a contractual commitment to provide the services and, therefore, processing is necessary to meet those contractual obligations;
3. The information is available to the public at large; and/or
4. The processing is necessary for the purposes of legitimate interests of the University or other third parties and does not affect the fundamental rights and freedoms of the individuals concerned.

How to Contact Us

Should you have any queries, suggestions or issues please do not hesitate to contact the Student Support and Wellbeing office on [01902 321074 x1074], [ssw@wlv.ac.uk](mailto:ssw@wlv.ac.uk) or you can write to us at the following address:

Student Support and Wellbeing

Wulfruna Street

MI001

Wolverhampton

WV1 1LY

West Midlands

UK

If you have any concerns or believe that your personal information is being handled in a manner which is contrary to statutory requirements, you may wish to contact the University of Wolverhampton’s Data Protection Officer via [dataprotection@wlv.ac.uk](mailto:dataprotection@wlv.ac.uk) or complain to the ICO via [www.ico.org](http://www.ico.org).

Revisions to the Privacy Policy

We may revise this privacy policy at any time in response to changes in the law or other factors. We encourage you to periodically visit this page to review the most current policy, or obtain a copy by contacting us directly.