

# Student Mental Health & Wellbeing Service Privacy Notice

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## A. Introduction

The purpose of this notice is to inform clients of the University Student Mental Health & Wellbeing service about how the University collects, uses and shares their personal data, and their rights in relation to the personal data we hold when using the Student Mental Health & Wellbeing service. This notice is available on the University website.

## B. Who is processing personal data

Leeds Trinity University determines why and how your personal data is used and is considered to be the data controller of the personal data. This places legal obligations on the University.

The University is registered with the Information Commissioner's Office as a data controller under the reference Z4817023.

## C. What personal data do we process

Leeds Trinity University processes personal data that is necessary for us to administer and deliver mental health and wellbeing services to you. This includes:

- Your name (first and last)
- Your gender
- Date of birth
- Mobile, home and term-time telephone numbers
- Term time and home addresses
- Term time and home email addresses
- Your course, year of study and mode (full or part time)
- Your student identification number
- Your GP details (name, surgery name, address, phone number)
- Information relating to the involvement of any other organisations relevant to the service we are providing you with, for example Social Services, NHS, etc.

- Basic factual notes about your family situation and relationship history relevant to particular presentations (i.e. if you have and are in contact with parents, partner, siblings)
- Basic factual notes about the situation you disclose (i.e. if bereavement, the relationship to the person, lost, relevant dates and the nature of the loss).

### **Special category data**

We may also process "special category data" which includes information about (where applicable):

- your nationality category
- your racial or ethnic origin
- whether you are disabled and if so, the nature of your disability
- religious beliefs or other beliefs, if it is relevant to the support we offer
- political beliefs and membership of any political or trade union organisations, if it is relevant to the support we offer
- your sexuality or sexual orientation, if it is relevant to the support we offer
- your physical or mental health, including any medical conditions, diagnosis, symptoms and medication currently prescribed
- any risk to your or others' wellbeing (self-harm and suicidal ideation, threats, violence towards others)
- core routine outcome measures (10-question scoring on your level of distress)
- previous counselling/ therapy if relevant to the current presentation.

Please note that processing in the context of the university's student mental health and wellbeing services covers primarily the collection, recording, storage, adaptation or alteration, retrieval, erasure or destruction of personal data.

## **D. The legal basis for processing your personal and special category data**

### **(i) Contract**

We may process your personal data and special category data because it is necessary for us to do so in order to fulfil the contract you enter into with the University when registering as a client of the student mental health & wellbeing service.

The University collects and processes personal information that is necessary to provide the required services to you for the contract and also to meet its legal and statutory obligations in delivering the contract.

### **(ii) Legitimate interests**

We may use and process your personal information where it is necessary for us to pursue our legitimate interests or a third party's legitimate interests. Such legitimate interests can include:

- monitoring usage of the student mental health & wellbeing service
- verifying the accuracy of data that we hold
- improving our services via staff training

### **(iii) Legal obligation**

We may also process your personal data for our compliance with legal obligations.

### **(iv) Vital interests**

The University will only rely on vital interests as a lawful basis for processing your personal data where it is necessary to protect someone's life.

## **(v) Consent**

The University will use consent as a lawful basis for some processing. Where we do so we **always** provide you with the choice as to whether or not to opt in to such processing.

## **E. What we use personal and sensitive data for**

Leeds Trinity University processes your personal and special category data for the following reasons:

- the provision of student mental health & wellbeing services
- maintaining records of appointments with the student mental health & wellbeing service
- to communicate with you for all matters relevant to your use of the student mental health & wellbeing service
- to evaluate the performance and effectiveness of the student mental health & wellbeing service
- to meet our compliance and regulatory obligations
- the prevention and detection of crime and assisting investigations as required by law
- to deal with complaints

## **F. Automated decision making**

The University does not make any automated decisions about you using your personal data.

## **G. Who we share your personal data with**

We do not share your personal data unless we have a legal basis to do so. The mental health and wellbeing support we offer is confidential and unless we have your explicit consent, we do not pass any of your data onto anyone outside the Service. The only time we would break this confidentiality is in cases of extreme risk of harm to yourself or someone else.

## **H. Changes to your personal data**

It is the responsibility of the client to notify the University as soon as possible if any of the data held about them needs to be updated or is incorrect. Clients can do this by contacting the student mental health & wellbeing service at: [studentwellbeing@leedstrinity.ac.uk](mailto:studentwellbeing@leedstrinity.ac.uk).

## **I. Will your data be sent or stored abroad?**

Some of the personal data we process about you may be transferred to, and stored at, a destination outside the European Economic Area (EEA), for example where personal data is processed by one of our software suppliers who is based outside the EEA or who uses data storage facilities outside the EEA.

In these circumstances, your personal data will only be transferred where the transfer is subject to one or more of the appropriate safeguards for international transfers prescribed by applicable law (e.g. standard data protection clauses adopted by the European Commission); a European Commission decision provides that the country or territory to which the transfer is made ensures an adequate level of protection.

## **J. How long do we keep your personal data?**

The University student mental health & wellbeing Service will keep your personal data for seven years from your final meeting with a practitioner.

## **K. How you can access personal information the University holds about you and other rights you have**

### **1. The right to be informed**

You have the right to be informed about the collection and use of your personal data and this privacy notice is part of the transparency requirements of data protection legislation.

### **2. Right of access**

You have a right of access to your own personal data held by the University. A request to see the personal data held by the University can be made through a Subject Access Request. Further information about how to request this is available [here](#).

### **3. The right to rectification**

You have the right to have inaccurate personal data held by the student mental health & wellbeing service rectified, or completed if it is incomplete. This can be done by contacting the student mental health & wellbeing service at [studentwellbeing@leedstrinity.ac.uk](mailto:studentwellbeing@leedstrinity.ac.uk)

### **4. The right to erasure**

Once personal data collected by the University is no longer necessary for the purpose for which it was collected and processed, you may have the right to have the data erased.

### **5. The rights to restrict processing and to object to processing**

In certain circumstances you have the right to restrict the processing of your personal data. This is likely to arise when there is an issue concerning the accuracy or the legitimate grounds for processing of the personal data.

### **6. The right to object to processing**

You have the right to object to:

- processing based on legitimate interests or the performance of a task in the public interest/exercise of official authority (including profiling);
- direct marketing (including profiling); and
- processing for purposes of scientific/historical research and statistics.

The University will stop processing the personal data unless there are compelling legitimate grounds for the processing, which override your interests, rights and freedoms.

### **7. Rights to data portability**

You have the right to receive the personal data concerning you in a structured, commonly used and machine-readable format. The University will respond to any Subject Access Requests in compliance with this. Further information about how to request this is available [here](#).

#### **Note:**

Detailed guidance on all of the rights you have with regard to the personal data that we hold and process about you is available on the ICO website here - <https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>.

## L. Contact us

If you have any queries about this privacy notice or how we process your personal data you can contact us at: [studentwellbeing@leedstrinity.ac.uk](mailto:studentwellbeing@leedstrinity.ac.uk)

If you are not satisfied with how we are processing your personal data please contact us. You can also report a concern about how your information has been handled to the Information Commissioner - <https://ico.org.uk/concerns/handling/>.

## M. Questions or concerns

If you have a concern about the way we are collecting or using your personal data, you should raise your concern with our Data Protection Officer. If you would like to report a data security breach (e.g. if you think your personal data has been lost or disclosed inappropriately) or if you would like to complain about how the University has used your personal data, please contact the University's Data Protection Officer at [dataprotection@leedstrinity.ac.uk](mailto:dataprotection@leedstrinity.ac.uk) or write to

Data Protection Officer  
Leeds Trinity University  
Horsforth  
Leeds  
LS18 5HD

Should you be dissatisfied with our handling of your concerns, you have the right to complain to the Information Commissioner at <https://ico.org.uk/concerns/handling/>.

## N. Evaluation and Review

This policy will be formally reviewed every year by the Data Protection Officer and the relevant department(s) within the University. In addition, the effectiveness of this Policy will be monitored as necessary on an on-going basis to ensure it is compliant with relevant legislation.

This policy was last updated in May 2022.