

**Newcastle University Students' Union (NUSU)
Student Advice Centre Privacy Policy
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The [Student Advice Centre \(SAC\)](#) is a service within the Membership and Democratic Services department of Newcastle University Students' Union ([NUSU](#)). We are registered under the Data Protection Act 1998 (registered number Z2204599), and all your data is collected, stored and processed in compliance with General Data Protection Regulation (GDPR) 2016.. More information on privacy can be found at www.dataprotection.gov.uk.

The SAC offers face to face, telephone, email and Skype advice to Newcastle University and INTO Newcastle students across its various campuses and this is delivered by trained and insured advisers. The service is licenced through [Advice UK](#).

Please note: Neither the information on the website or the advice delivered by the Advisers within the SAC is Legal Advice. If [Legal Advice](#) is required you are advised to seek out a [solicitor](#). If you are entitled to Legal Aid you may be able to get assistance from [Civil Legal Aid](#)

This Privacy Policy aims to explain what information the **SAC** collects and holds about you from the point you present to the service. It will explain how we use and store that information, process it internally or through third parties your rights and options for its removal from our systems. For information the wider organisation NUSU holds about you please refer to the [NUSU Privacy Policy](#) of which the SAC operates within as well.

Changes to Privacy Policy

The SAC reserves the right to add to or alter the terms of this Privacy Policy in its sole discretion, without prior notice to you. The Policy will be re-visited and revised if necessary on a 6 monthly basis. Any revision of this Privacy Policy will be posted on the SAC web pages and issued independently or alongside any requested hard copy of the SAC Service Standards. It will become effective from the time of posting to the Web Site. You are advised to read the Privacy Policy before any initial use of the Service and then at regular intervals to ensure you are fully aware of what the SAC does with your data and information. Please visit this Privacy Policy on a regular basis to make sure you have read the most recent version.

Website

We advise you look at the [NUSU Privacy Policy](#) with regard to how **any data** is collected, stored, processed and retained from any part of NUSU website. NUSU and how any third party who host/maintain the NUSU Website, including the SAC web pages, may collect information about you to enable you to do so.

The SAC webpages are updated by NUSU/ SAC staff and student volunteers and is for general guidance for students. We advise the pages be used in conjunction with advice from the Centre as the guidance can be interpreted differently and will not cover all situations. We endeavour to keep the information on the website current, accurate and accessible but we cannot guarantee that it is without error. We do not accept any liability for any loss, damage or inconvenience as a result of using our web pages. We are not responsible for any claim brought against you as a result of you relying on the website content. Nor do we accept responsibility for the content of or the availability of any linked third party websites. Their websites may also collect certain personal information about you and so please ensure you read their respective privacy policies and terms and conditions thoroughly and carefully. Links to third parties websites are not an endorsement by our service either.

As a means of improving our service and hoping to provide information to as many students as possible, the SAC examines analytical information that NUSU collects about usage of the SAC web pages, for example, the number of visitors, which pages they visited and for how long. This is not connected to your use of the service as a client in respect of a case in any way.

The SAC currently collect data/personal data via the use of web forms for specific purposes: providing feedback, applying for volunteering, completing surveys or making a disclosure or report to NUSU. These web forms are provided by various third parties who are identified in the wider [NUSU Privacy Policy](#)

Student Advice Centre

When we take data and why we take it

- We take personal data from students at various points, either face to face, by telephone, email, web form or Skype.
- The SAC is a student-led service – we will not contact you first. If we are contacted by a third party wanting to make a referral about you we will not take or record or process that information. From the moment you initiate contact with the SAC requesting assistance we will start to request, record store and process certain personal data/information about you in order to offer you a service. We will take information from you at various points. If we suggest or need to make a referral to a third party we will either seek your consent or refer in exceptional circumstance on the basis of there being a legitimate interest. Sometimes we do not make a referral but work in conjunction with them in order to support or resolve the issue. If we receive personal data regarding a third party i.e. to identify a conflict of interest, we will store that personal data and information but will not process it. If a data subject request is made only information which does not identify the source will be given out.
- **When you approach the service by whatever avenue**, in order to facilitate contact with the advice team we will need to verify that you are a registered or recent former student from either any Newcastle University campus or INTO Newcastle. You will be initially asked to provide some limited personal and academic related data in either verbal and/or written form in order to verify this and to arrange an appointment with an Adviser. It also allows us to check your enquiry is appropriate to the service and to reserve the appointment for you. Our clients volunteer this information when asked at the point of entry and by offering this information this is your implied consent. It is explained to each prospective 'student client' that they will be required to give further and more detailed information about themselves at the prescribed appointment. The appointment slip directs students to the this policy. If a student is not prepared to offer the information we require we would not be able to verify the student status and therefore not be able to offer a service,
- The initial personal data/information you provide when arranging the appointment is stored on Microsoft Outlook calendars. These are visible to only SAC staff and student volunteers. NUSU staff are not permitted access to the SAC calendars and therefore cannot see this data (with the exception of the IT Coordinator for NUSU). All staff and volunteers who have access or who are based in the location of the SAC are required to sign a SAC Data Protection and Confidentiality Agreement before commencing employment or volunteering with the service. Breach of this agreement would lead to disciplinary procedures under the [NUSU Disciplinary process](#).
- All appointments are offered an SMS text reminder. We use a third party text reminder service called TextTank provided by CLX Communications. This is optional but anyone requesting this service is asked to provide consent for us to provide the third party provider with the relevant mobile number. Those booking appointments over the telephone will be sent an email with the appointment time and date and Text Tank details with a query as to whether a text remainder is required. Only replies with consent will ensure this is provided.
- At your **first appointment (face to face/Skype/phone/email)** with the service we will ask you to provide more detailed personal data/information about you via a manual client sheet. We ask for this so that we can assist you with your query/case but it also allows us to identify you, distinguish you from other clients, verify your student and academic information for service provision and monitoring, provide us with demographic data. The latter allows us to identify section of students who are/aren't using the service and about what type of issues. Our client sheet has a brief declaration on it explaining how we store the information once it has been returned. We use client demographic details, patterns and trends on case types and subject matter in order to report on students' issues and performance of the SAC. Your information and personal data is kept on Advice Pro for 6 years. We keep it on file for this length of time because of your rights under the Limitation Act 1980 to pursue/defend any matter through the civil courts. We also keep it for this duration as it can give us evidence over a period of time of patterns and trends to demonstrate for funding purposes or social policy work.
- You can discuss this with the Adviser at the commencement of the appointment. As we have to be insured to offer Advice we need to take this information so we have a record of who we have offered advice to and what has been discussed in the event of any claim against our service. Therefore

where consent is not given, this means we are unable to offer a service. Our service standards also cover this more comprehensively. The next section outlines what data we take.

- **Web forms** – as mentioned above, when you complete the web form you will be asked to acknowledge the data you have entered can be held/stored by either NUSU, the SAC or both before you submit. This will be in line with NUSU Privacy Policy. Where the web form does not request any personal data but contains free text boxes, you need to be careful to ensure information you place in these does NOT contain personal data especially if the form is intended to be anonymous
- **Ongoing Appointments / Returning clients** after any lapse of time are asked to complete a very short update of details form.
- **Clinics** – the SAC facilitate specialist clinics from time to time. The clinics are responsible for their own personal data handling unless an arrangement is made with the SAC to hold data. The only clinic NUSU currently facilitate within the building is the Massage clinic run by Wan Ng. The SAC currently store electronically a copy of a new client form on the SAC service drive.
- Our legal basis (reason) for taking, storing and processing your personal data is:
 - a) **Client /cases/ Massage clinic/It Happens Here disclosures & reports/ Volunteer Applications- Legitimate Interest.** We need to take this so we can verify you meet the conditions of access, no conflict of interest exists or arises, and the issue you are presenting with is appropriate and we are aware of necessary facts and information in order for us to advise and support fully whilst also considering safeguarding and wellbeing. The legal basis for taking and passing on your mobile telephone number to our preferred provider for text reminders is one of consent on your part. Without your express consent this service will not be offered.
 - b) **Surveys** - NUSU and the SAC conduct surveys to improve service provision for students. Any data gathered in a survey is done so under **Legitimate Interest**.
 - c) **Jiscmail Group** – where staff members have ownership of JISCMail groups, **consent** will be sought by signing up to the email group.
 - d) **Special Category Data** – where we process special category data, such as disability, health needs and nationality, consent will be sought for this on the initial case sheet that is completed by every client.
 - e) Staff information and data – **Contract**
 - f) Student Volunteers information and data – **Legitimate interests**

How we protect of your data & who has access to it

NUSU is **not** a department or service of Newcastle University. NUSU is a distinct organisation and charity. Some information is shared across the two organisations. The data held by the SAC is never shared without consent or unless there is a legitimate interest under safeguarding or compliance with the law.

All personal data/case notes and associated documents are held in strict confidence. We will not provide your personally identifiable data to any third party other than those identified, unless we are required to do so by law. If we need to release any information to a third party we will only do so with your express consent. We will seek your consent on each and every instance.

Breach of Data Protection and Confidentiality/Anonymity will only occur **by exception**: where we are required to release this information by law, and where it is in the interests of safeguarding either you, others or minors.

NUSU is an inclusive organisation that represents, supports and provides activities and services for all registered students. The SAC service is offered regardless of age of the student. However the information on our website is generally aimed at students over the age of 18 and only advice offered face to face would be tailored to students under that age i.e. INTO students. The SAC's advice and guidance is made with regard to the [NUSU Policy for the Safeguarding of Children and Adults at Risk](#)

All SAC staff have secure password protected (encrypted) log-ins to NUSU servers through either a named email account or a role account. This provides access to Microsoft Office Suite which is predominantly used to store/process some personal data. The SAC has secure service drives on the NUSU servers which SAC staff, Volunteers & IT staff have access to as where relevant and appropriate to their position e.g. SAC Managers are the only staff who have access to the Management Drive ; all SAC staff have access to the Volunteer Management Drive; Volunteers only have access to the Volunteer drive. All SAC staff can access the full case management system. All manual files are held in lockable filing cabinets or cupboards. In the event of a complaint or issue beyond the capability of an Adviser the Senior Advisers would access the client / case record. All cases can be handled by any of the Advisers.

Any staff data and information is held in either lockable filing cabinets within a lockable room or on secure password protected (encrypted) NUSU servers. The data access is ring fenced to staff with responsibility for storage of HR documentation or with management responsibility.

Any SAC student volunteers data and information is on secure password protected (encrypted) NUSU servers. This may have been received via the various NUSU web forms and then exported. The data is ring fenced to SAC staff.

Third parties - The SAC may choose to use the services of third parties in order to enhance or support the service provision. Below we have identified those third parties currently used.

Where your data is and who has access to your data?

The Data Controller is NUSU. The Data Controller does not have access to **all** data across the organisation. NUSU as a whole organisation does not have access to the SAC student data or student client's case notes

The SAC uses services from a variety of providers/third part processors, to assist in its provision and function. We currently use:

- Advice Pro a fully managed, secure (encrypted) web based case management software system with password controlled log on to keep your data safe. Supplied by our licencing body Advice UK and provided by their associate company ACM Solutions Ltd, for storage of clients details and case notes. Links are provided here to the privacy policies of both [Advice UK](#) and [ACM Solutions Ltd](#). You can find links to their respective terms and conditions at the bottom of their privacy policy pages. SAC staff and the staff at ACM Solutions Ltd and Advice UK can all access and process the data. ACM Solutions Ltd store and process the data for the SAC. They have to request SAC consent to access any client/case file in order to provide technical support. They store the data on their own servers housed at Bright Solid.
- Our service only uses Skype calls not Skype messaging so no information is held by Skype.
- Text Tank (CLX Communications) for sending a SMS text reminder of appointments. Only the client's mobile telephone number is provided. The mobile number is kept for 7 days and anonymised data is held for 1 year.
- MSL web forms for surveys, feedback and volunteer applications – these can be access by NUSU IT staff and the SAC See the [NUSU Privacy Policy](#) for details.
- 123 Form Builder web forms for our Sexual Harassment/Violence/Hate Crime disclosure and reporting web form. These forms are directed to the SAC Adviser email accounts only. They do not go to any central role account. See the [NUSU Privacy Policy](#) for details.
- Microsoft Office – Outlook and Excel – have encrypted staff login and drive log in.
- NUSU service drives – are ring fenced to the respective service staff and have encrypted staff login. Staff are required to lock their PC's when away from them.
- JISCmail – where we act as owner/administrator of a group and using this third party provider we do so on the basis of consent. We configure the group with Private Archives so only the group can access the email discussion content. Link to JISCmail [Service Policies](#) and [Privacy Policy](#)
- Clinics – clinics are responsible for their own personal data handling /storage with the exception of the Massage clinic run by Wan Ng. The SAC currently store electronically a copy of a new client form on the SAC service drive.
- **Any staff data and information is on secure password protected (encrypted) NUSU servers or locked filing cabinets within either service areas or the main administration office. The data is ring fenced to staff with responsibility for storage of HR documentation and management responsibility. Student Volunteers information is held only within the SAC and accessible only by SAC staff.**

In all cases above, NUSU has sought data processing agreements which specify how the organisation is GDPR compliant and that they will not share data without our consent and have secure storage of data and safeguards in place.

What data we request

Below is a table of the data we take. We have the right to alter this data from time to time and this SAC Privacy Policy will be updated to reflect any changes. Changes will not be applied retrospectively.

We may ask for 'special categories' of personal data as defined in the EU General Data Protection Regulation (GDPR) 2016 - for example, questions relating to your health / disabilities so we can provide adjustments in order to offer you a service.

In respect of case note content this constitutes special category personal data and is very specific to the case and can include medical details/records, financial records and transactions, personal ID's, third party information is only held for the purpose of dealing with the case. Only details relevant to the case will be held:

What Data in Green also applies to BESS clients upto June 2017	Why	(PD/SCPD)
Surname/family name	Means of identification	PD
First names	Means of identification	PD
Title	Means of address	No
Date of Birth	Means of identification/Monitoring/Statistical purpose	PD
Academic Status	Monitoring/Statistical purpose	No
Mode of study	Monitoring/Statistical purpose	No
Stage of Study	Monitoring/Statistical purpose	No
Local address	Means of identification/contact	PD
Home address	Means of identification/contact	PD
Student Number	Means of identification/monitoring	PD
Telephone/mobile numbers	Means of identification/contact	PD
Uni/other email	Means of identification/contact	PD
Preferred means of contact	Preferences	No
Caring/dependent responsibilities	Monitoring/Statistical purpose/Advice provision	PD
Whether message can be left	Preferences/Safeguarding	No
Gender identified with	Monitoring/Statistical purpose/ Means of address	No
Fee status	Monitoring/Statistical purpose/Advice provision	No
Nationality	Monitoring/Statistical purpose/Advice provision	PD
Subject studied/Course	Means of identification/monitoring/Advice provision	No
Length of Course	Means of identification/monitoring/Advice provision	No
Stage of Study	Monitoring/Statistical purpose/Advice provision	No
School	Means of identification/monitoring	No
Faculty	Means of identification/monitoring	No
Degree Status	Monitoring/Statistical purpose/Advice provision	No
Health/Disability	Service Provision /Monitoring/Statistical purpose/Advice provision	PD
Campus	Means of identification/monitoring/Advice provision	No
Nature of Enquiry	Service Provision/Adviser Allocation/Advice Provision	No
Appointment type	Service Provision /Monitoring/Statistical purpose	No
How a student found out about the SAC	Monitoring/Statistical purpose	No
Previous use of service	Monitoring/Statistical purpose	No
Case note content	Advice Provision - Follow up/Casework/Evidence	PD/ SCPD
Documents in multiple formats	Advice Provision - Follow up/Casework/Evidence	PD/ SCPD
Photographs	Advice Provision - Follow up/Casework/Evidence	PD/ SCPD
Recordings	Advice Provision - Follow up/Casework/Evidence	PD/ SCPD
Conflict of Interest names	Advice Provision	PD
Landlord details	Advice Provision /Monitoring/Social Policy Work	No
Agent Details	Advice Provision /Monitoring/Social Policy Work	No
Third party interest details	Advice Provision	PD
Social Issues	Service Provision / Safeguarding / Support	PD/ SCPD
Printed name & Signature	Means of identification	PD
SAC Volunteers		

Name	Means of identification	PD
Address	Means of identification	PD
Emergency contact details	In case of Emergency	PD
Health issue / Disability	In case of Emergency / For adjustment	SCPD
Mobile Number	Means of identification/contact	PD
Subject studied/Course	Means of identification/monitoring	No
Stage	Monitoring/Statistical purpose	No
Personal Statement	Means of recruitment	No
Photos	Means of Identification/Promotion of volunteering activity	PD
Printed name & Signature	Means of Identification	PD
It Happens Here		
Name	Means of identification/contact	
Email	Means of identification/contact	
Phone Number	Means of contact	
Massage Clinic		
Surname	Means of identification	PD
First Name(s)	Means of identification	PD
Title	Means of identification	No
Date of Birth	Means of identification	PD
Student Number	Means of identification/monitoring	PD
Gender identified with	Monitoring/Statistical purpose	No
Telephone Number	Means of identification/contact	PD
University Email	Means of identification/contact	PD
Date	Monitoring point of contact	No
Treatment	Record of service offered	No
Printed name & Signature	Means of identification	PD
SAC Staff		
Address	Means of identification/Contact	PD
Telephone Numbers	Means of identification/contact	PD
Emergency contact	In case of Emergency	PD
HR related Documents	Management – PDR/Sickness/Supervision	PD
Evaluation		
Home / International	Monitoring/Statistical purpose	No
Gender identified with	Monitoring/Statistical purpose	No
Degree Status	Monitoring/Statistical purpose	No
Matter Category	Monitoring/Statistical purpose	No
Adviser	Monitoring/Statistical purpose/Training/Complaint handling	No
Multiple opinions	Monitoring/Statistical purpose/Training/Complaint handling/Revise provision	No
Email (optional)	Provide response comments made (optional)	PD

Your Individual Rights (see below) in respect of the data the SAC take are supported by this document:

- **The right to be informed** - about the collection and use of your personal data. Including our purposes for processing your personal data, our retention periods for that personal data, and who it will be shared with.
- **The right of access** – to confirm your data is being processed and what personal data and supplementary information is held. This allows you to be aware of and verify the lawfulness of the processing. Please make a request to the Data Controller NUSU. This is free of charge.
- **The right to rectification** - within one month of request to have inaccurate personal data rectified, or completed if it is incomplete. Please let us know and we will remedy within the time frame and notify you when this has been done.
- **The right to erasure** - within one month of request either verbally or in writing to have personal data erased – the right is also known as ‘the right to be forgotten’. The right is not absolute and only applies in certain circumstances. Please let us know and we will notify you within the time frame when this has been done.
- **The right to restrict processing** – requests made verbally or in writing for the restriction or suppression of your personal data. This is not an absolute right and only applies in certain circumstances. When processing is restricted, personal data may be stored but not used. Please let us know and we will notify you when this has been done.
- **The right to data portability** - allows you to obtain and reuse your personal data for your own purposes across different services - to move, copy or transfer personal data easily from one IT environment to another in a safe and secure way, without hindrance to usability.
- **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.

Beaches of Data Protection

The GDPR introduces a duty on all organisations to report certain types of personal data breach to the relevant supervisory authority, within 72 hours of becoming aware of the breach, where feasible. If it is likely to result in a high risk of adversely affecting an your rights and freedoms, we must also inform you without undue delay. Regardless of whether we are required to notify, we have set our service standard to say we will notify in all instances.

Further information on what these rights are can be found on the [Information Commissioners Office website](#)

Duration of Data Storage / Restriction. Rectification and Erasure

Duration of Storage & Erasure

Each September the SAC run an archive report instructing ACM Solutions Ltd to archive any personal data/cases notes following 6 years from closure or last case activity from the Advice Pro software. This means that once deleted a data subject will no longer be able to return to the service for a record of their case or make an enquiry relating to their case. Only demographic information if held indefinitely.

Please Note: Data subjects can make a request at any time for their personal data and information to be removed. In respect of a client/case this means that once deleted a data subject will no longer be able to return to the service for a record of their case or make an enquiry relating to their case.

Each August following the end of the Academic Year the SAC staff will erase any communication from Outlook Email older than 6 years from the end of the Academic Year.

Each August following the end of the Academic Year the SAC staff will erase any personal/data information older than 6 years from any SAC service drives on the NUSU servers. No student personal data or information will be held on any staff member hard drive. The Massage clinic client forms are deleted from the Service Drive after 3 years. Staff information held on the SAC management drive will remain for 6 years beyond a term of employment. Staff references are therefore only able to be provided for up to 6 years.

Each August following the end of the Academic Year the SAC staff will shred/dispose via confidential waste collection, any manual paper files/documentation held in the service

Any data taken online via MSL or 123 Foorm builder in the form of reports/surveys/applications is collected in line with the [NUSU Privacy Policy](#)

SAC staff will shred/dispose via confidential waste collection, any manual paper files/documentation held in the service

Staff information will be held for the duration of their contract and 6 years beyond.

SAC Volunteer personal data and information will be held for 3 years only. For this reason we will only be able to confirm if you have volunteered and what this entailed for 3 years following the end of your volunteering with the service.

Feedback

If you have any queries or problems with regard to this Privacy Policy or the uses to which the SAC puts your personal data/information, please contact the SAC Senior Advisers via the [Student Advice Centre](#).

Ruth Gibson and Jill Lincoln
Senior Advisers and Service Managers
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