

# Edge Hill Students' Union Advice Centre Privacy Policy

### Introduction

Edge Hill Students' Union's (EHSU) Advice Centre takes your right to privacy very seriously. When you access our services, any personal information you provide us with will be treated in the upmost confidence, in accordance with the principles enshrined in the Data Protection Act 1998 and the General Data Protection Regulation (GDPR) introduced in 2018. This policy details the Advice Centre's responsibilities and practices in relation to how the information we collect from you is recorded, used and shared.

## What information do we collect and why?

When you first contact the advice centre, whether by email, telephone, or in person, we will encourage you to book an appointment with one of our advisers. To do this, we will require some basic personal information from you, including your name, telephone number, email address, Student ID number and the nature of your enquiry. Appointments with EHSU Advice Centre are booked through our website via SimplyBook.me, our secure, GDPR-compliant booking management system

By providing this information, you are agreeing that EHSU Advice Centre can create a case file for you, which will be stored on Advice Pro, a GDPR-compliant case management system. In accordance with Article 6 of GDPR, there is a legitimate interest in us processing this data. Such information is essential for us to determine whether you are eligible for advice, progress your case, avoid any conflicts of interest, and keep you informed of any developments related to it. Retaining a record of your case also makes it easier for you to seek redress should you wish to complain about the advice you have received.

In addition to the personal information listed above, we may also request that you provide us with certain demographic data about yourself. This data might relate to, among other things, your gender, sexual orientation, ethnic origin, or disability status. We request this kind of information for statistical and monitoring purposes. Doing so allows us to enhance our services through the identification of relevant trends among those accessing the Advice Centre. In any analysis or promotional work based on demographic data, information will be anonymised to ensure that no individuals can be identified from it.

Under GDPR, the kinds of demographic information referred to above are considered "special category" personal data and, as such, can only be recorded and processed by us with your explicit consent. Therefore, you are under no obligation to share this information with us. Moreover, refusal to do so will in no way affect your right to receive advice from us.

After accessing the Advice Centre, we may ask you for feedback, either online or via a paper form. You will have the option to include personal information when completing the form, but this is not mandatory. Any information you provide may be used for enhancement or promotional purposes. You are under no obligation to provide feedback and refusing to do so will not affect your right to continue accessing our services.



#### How do we collect and store your information?

It is vital that we keep clear accurate case records for those who access the Advice Centre. Doing so helps our advisers to understand and monitor the progress of your case and, where necessary, take agreed upon actions in accordance with any deadlines associated with it.

As detailed above, appointments with the Advice Centre are booked through our website via SimplyBook.me, with the information you provide used to set up a case file on Advice Pro. Both SimplyBook.me and Advice Pro have their own privacy policies that are compliant with GDPR. Advice Pro is a secure case management system. It is password protected, with only EHSU Advice Centre staff and management able to access it.

When you book an appointment, the adviser you select will receive a notification from SimplyBook.me via email. The information contained in the email will form the basis of your Advice Pro case file. Once the adviser has created your case file, your adviser will delete the notification email from SimplyBook.me.

Subsequently, all information relating to your case will be stored on Advice Pro. This information may include appointment notes from any meetings you have with your adviser, as well as any correspondence with you or third parties related to your case. Documentation indicating whether you consent to us recording special category data will also be included in your case file. Email correspondence relating to your case will be deleted by your adviser once added to Advice Pro. Similarly, any relevant paper correspondence or documentation will be scanned and uploaded on to Advice Pro, before original copies are shredded and/or deleted.

In the rare event of a file pertaining to your case being too large to upload to Advice Pro, your adviser will save the information to their secure personal drive on their work computer, ensuring that the file is password protected. Once your case is closed, any such files will be deleted.

Advice Centre staff and management adhere to a clear screens and clear desk policy. This means that when away from their desks, their computer screen will be locked and password protected, ensuring nobody else can access information stored on their computer. Likewise, any paper documentation relating to a client will be stored in a locked drawer that only Advice Centre members of staff have access to when an adviser is away from their desk.

Cases are deemed closed when you or your adviser confirm there is no more work to be carried out in relation to it, the matter has been referred to another agency, or the Advice Centre has ceased representing you. Your case file will be stored on Advice Pro for six years after it has been closed, unless you request otherwise. Retaining your case file(s) for this length of time protects both you if you wish to seek redress in the event of receiving inaccurate advice and us, in order to assess the merits of any such complaint. After six years, all identifying data will be removed, along with any case notes and relevant documentation. A fully anonymised record of your case will remain on the system to allow Advice Centre staff to create longitudinal statistical reports.

#### Sharing your data

There are some rare instances when we have a statutory obligation to share your data. These include cases relating to terrorism or other criminal activity, child protection concerns, and where we have



serious concerns about your or someone else's safety. If no such reasons are applicable, your personal information will only be shared with a third party with your consent.

To pursue the outcome you are seeking, there may be occasions when it is desirable for us to share information about your case with other parties involved in it. For example, for an academic issue, it may be necessary to discuss your case with members of staff from the university. If this is the case, we will ask for your written permission to discuss your case with relevant third parties. While you are not obligated to provide consent in such instances, not doing so will inevitably limit the level of advice and support we are able to provide you with.

As part of our quality assurance procedures, the Advice Centre Manager may review a sample of case files periodically. This is to ensure that the advice given by our advisers is appropriate and of a high quality. Any feedback based on case reviews will only be shared between the Advice Centre Manager and the individual adviser responsible. Cases may also be reviewed periodically by an external auditor. In such cases, personal data will remain confidential. You also have the right to refuse an external auditor access to your case file.

The work of the Advice Centre helps shape EHSU's broader organisational aims. As such, we record statistical data relating to those who access the service, in order to identify relevant trends and inform policy development. This information may be shared in the form of public facing reports or promotional materials. However, any statistics that we share internally or externally will be anonymised. We may also use example cases when reporting the work we do to our stakeholders. While these kind of case studies will be anonymised, we will not use your case for such purposes without you giving us permission to do so.

#### Data Breach

Edge Hill Students' Union is registered with the Information Commission Office (ICO), an independent body that upholds information rights. In the unlikely event of an unauthorised person or persons accessing the information you have provided us with, this will be classed as a data breach. If this were to happen, we would inform you and the ICO of the breach as soon as possible.

Advice Pro and SimplyBook.me have their own procedures in the event of a data breach. EHSU's Advice Centre Manager is responsible for ensuring that the primary contact details held by Advice Pro and SimplyBook.me are up to date. Doing so minimises the risks associated with there being a delay in reporting a data breach.

#### **Your Rights**

Under GDPR, you have the right to access an electronic copy of your case file and documentation associated with it. An electronic copy of your case file can be provided free of charge within one month of you requesting it. You are also able to access your data in a machine readable format and request that we amend any personal information that you deem to be incorrect. To request your case file, please email <u>suadvice@edgehill.ac.uk</u>. Before releasing your file, we will ask you to provide proof of identification.

As detailed above, our standard procedure is to retain case files for six years after a case has been closed. However, you have the right to ask for your case file to be erased at any time. Any client wishing to erase their case file should contact <u>suadvice@edgehill.ac.uk</u>. In the event of there being a



statutory obligation to retain a case file, it will not be possible to delete it from our records. Accordingly, it may be necessary for the Advice Centre to seek legal advice before carrying out any request to erase personal data outside of our standard data storage procedures.

More information about your rights under GDPR can be found here:

https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/

## Review

This policy will be kept under regular review. EHSU reserves the right to add to or alter this policy without prior notice. It exists in conjunction with EHSU's Privacy Policy and may be updated in accordance with any changes to that policy or relevant legislative changes.

This policy was last updated on 24<sup>th</sup> May 2018.

## Contacts

If you have any queries related to this policy, please get in touch using the contact details below:

Edge Hill Students' Union Advice Centre suadvice@edgehill.ac.uk

David Jones <u>David Jones@edgehill.ac.uk</u> Edge Hill Students' Union Policy & Campaigns Manager.