

STUDENT ADVICE CENTRE



PRIVACY POLICY



Newcastle University Students' Union (NUSU)
Student Advice Centre Privacy Policy
01912393979 student-advice-centre@ncl.ac.uk

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 the UK General Data Protection Regulation (UK GDPR), tailored by the Data Protection Act 2018. More information on privacy can be found at www.dataprotection.gov.uk.

The SAC offers advice via face to face, telephone, video conferencing (MS Teams or Zoom) to Newcastle University and INTO Newcastle students across its various campuses. We also offer the service to a limited number of students from universities where we have a reciprocal Conflict of Interest Service Level Agreement. If you are a student who has been referred to a service where we have a reciprocal agreement you will need to refer to the privacy policies of those services. . NUSU SAC service is delivered by trained and insured advisers and is a member of Advice UK.

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 periodically or if necessary. 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 have read the most recent version and are fully aware of what the SAC does with your data and information.

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 the NUSU website. That Policy will explain more about how NUSU and any third party that host/maintain the NUSU Website, including the SAC web pages, may collect information about you, to enable you to use the webpages.

The SAC webpages are updated by NUSU/SAC staff and on occasions SAC student volunteers and is for general guidance for students. We advise the pages are used in conjunction with advice from the Centre as the guidance can be interpreted differently and will not cover all situations and circumstances. 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 party websites are not an endorsement by our service.

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 collects 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. NUSU may also use the data from web forms to create anonymous statistics and reports. These web forms are provided by various third parties. More information on how your information is used from web forms is 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 video conferencing (MS Teams or Zoom).

- 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, record, or process that information with the exception of any Conflict-of-Interest referral under a reciprocal Service Level Agreement and the data transfer will have been explained to you in advance). 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. You are required to provide this to access the service. Your personal data / along with all case information, whether written, digital, audio, visual or other format is processed by NUSU SAC only. Any changes to how the SAC manage data will be reflected in future versions of the privacy policy. 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 a third-party 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 on the basis of there being a legitimate interest. 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. If you are a student at another University and have been referred to us as a Conflict-of-Interest referral under a reciprocal Service Level Agreement, your University will have verified this to us in advance. You will be initially asked to provide some personal and academic related data in either verbal/written/web 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 may be required to give further and more detailed information about themselves at the prescribed appointment. If a student is not prepared to offer the information we require we would not be able to verify the student status and therefore would not be able to offer a service.
- Some of the initial personal data/information you provide when booking the appointment is stored on Microsoft Outlook calendars. These are visible to only SAC staff and student volunteers. Other NUSU staff are not permitted access to the SAC calendars and therefore cannot see this data (with the exception of NUSU IT Coordinator - [tech support](#)). 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 upon](#) commencing employment or volunteering with the service. Breach of this agreement would lead to disciplinary procedures under the [NUSU Disciplinary process](#).
- All booked appointments will receive an appointment confirmation (physical or digital) with the appointment time and date. This confirmation also directs to this Privacy Policy. We can use a third-party text reminder service called *TextAnywhere* provided by TA and MB Ltd. This is a completely optional service. Anyone requesting or offered this service is asked to provide consent, again physically or digitally. This provides us with the legal basis for passing on the mobile phone number data onto the third-party provider.
- In order to book your first appointment with the service, you will need to complete an online booking form where we will ask you to provide more detailed personal data/information about you. 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. This also provides us with demographic data allowing us to identify cohorts of students who are/aren't using the service and about what type of issues. Our booking form has a brief declaration on it explaining how we store the information once it has been returned and links to this policy. 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 our client/case management software called 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, safeguarding or harm reduction work. Any data will be anonymised before being shared with the wider organisation, University or external services. It is also held for the purposes of our insurance policy.
- 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. Our service standards also cover this more comprehensively. The next section outlines what data we take.
- **Web forms** – as mentioned above, when you complete a 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 submit 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.
- Our legal basis (reason) for taking, storing and processing your personal data is:
 - a) **Client/cases/Clinics/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. It also acts as a record on how and what you have been advised in the event of confusion/complaint or claim. In the event of a claim or complaint about the service your data and details may need to be shared with internal/external third parties in order for a response to be provided.
 - 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) **JISM@il Groups** – where staff members have administrator/ownership of JISCM@IL groups and are controller of the subscriber data, **consent** is provided on the basis a subscriber has to opt in by requesting membership. All subscribers are issued links to JISCM@il data security and privacy policy information on their subscription confirmation email, the group list area and have the 'Unsubscribe' option on all email communications.
 - d) **Special Category Data** – where we collect and process special category data, such as disability, health needs, ethnicity, and nationality, this is an 'optional' request on our client booking forms. We may on occasion, use this special category data only for the purposes of highlighting generic areas of concern and providing appropriate support and services. Provision of this is regarded as **consent**.
 - e) Staff information and data – **Contract**
 - f) Student Volunteers information and data – provided through web forms in the application process and any additional information held in the course of volunteering this is held on the basis of there being a **Legitimate interest**.
 - g) **Appointment SMS text reminder service** - via *TextAnywhere* – 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. We ask you if you require this and you have to opt in to be given this.
 - h) **Webinars** – the SAC may offer webinars for students/staff/volunteers on a variety of subjects or training. These are offered out by web-linked invitation via email and social media. These will often be recorded, and this will be made clear on the invitation and at the start of any webinar. Participants will be asked to provide their name and email address, and this can be displayed in the participant list that might be recorded and then publicly shared. This data will also be held by the software provider. For more information on their data protection compliance, you can access their own privacy policies or via links when participating.

How we protect 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 beyond the SAC staff 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) logins 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 temporarily store/process some personal data. The SAC has secure service drives on the NUSU servers which SAC staff, Volunteers & designated 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 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.

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.

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. Your client/case file is held and processed on secure servers. 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 Online Innovation Limited. If you present as a group or your case develops into a group case all communications will be sent to the entire group and stored on all clients case files often by a function called group actions. If communication is evidently not relevant to the group case file it will be stored on the individuals case file. We will have asked you on the booking form if you consent to NUSU SAC using any success on your case for service promotion purposes and we may contact you for research purposes.
- **TextAnywhere** (TA and MB Ltd) for sending an SMS text reminder of appointments. Only the client's mobile telephone number is provided. The mobile number is kept by TextAnywhere for 365 days before being permanently deleted.
- SUMS web forms for surveys, feedback and volunteer applications – these can be access by designated NUSU IT staff (tech support) and the SAC. See the NUSU Privacy Policy for details.
- **Jotform/Other web form** for our client booking web forms, campaigns, surveys. These forms are directed to the SAC central role account student-advicer-centre@ncl.ac.uk. They are processed by SAC staff and SAC Student Volunteers. These can be accessed by NUSU IT staff (tech support). See the NUSU Privacy Policy for details.
- **Microsoft Office**(Outlook and Excel) have encrypted staff login and drive log in. We do not use Excel tot store any identifiable student data.
- **Zoom** – can be used for students unable to access appointments via MS Teams. The appointment will have a meeting ID and a passcode. Clients using Zoom will be covered by Zoom's Privacy Policy
- **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.
- **JISCM@il** – 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. You can read JISCM@il's Service Policies and Privacy Policy
- **Clinics** – clinics are responsible for their own personal data handling /storage. **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 relevant cases above, NUSU has either 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 or the company has provided sufficient assurance through their own terms and conditions and data policies.

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 UK General Data Protection Regulation (UKGDPR),

tailored by the Data Protection Act 2018 - for example, questions relating to your health / disabilities so we can provide adjustments in order to offer you a service. Occasionally NUSU will share pertinent collated and anonymised information from all categories of data from across a range of cases with the University. This would be for monitoring and improving areas of concern, safeguarding, improving the educational experience of all students, the experience of future students or for academic research purposes and can be added to any data the University holds. Once held by the University it can be subject to a Freedom of Information request.

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:

Which Data?	Why	Personal Data/Special Category Personal Data
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
Addresses	Advice Provision - Follow up/Casework/Evidence	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
Pronouns	Means of Address	PD
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
Religion or Belief	Monitoring/Statistical purpose/Advice & Service provision	SCPD
Ethnicity	Monitoring/Statistical purpose/Advice & Service provision	SCPD
Sexuality	Monitoring/Statistical purpose/Advice & Service provision	SCPD
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
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
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

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** - the right is also known as 'the right to be forgotten'. The right is not absolute and only applies in certain circumstances. We have a Legitimate Interest to refuse this until after a six-year period whereby any civil action either in connection with your case or in respect of any claim against us, will be statute barred. Beyond that date we routinely and automatically archive (erase) student data.
- **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

GDPR introduced a duty on all organisations to report certain types of personal data breach to the Information Commissioners Officer with 72-hour of coming aware of the breach. If a breach occurs NUSU will use the ICO's online self-assessment tool to determine if the data breach should be reported. This process will be managed by NUSU's Data Protection Officer (Dir of Digital and Communications).

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 automated archive process, 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 is held indefinitely.

- **Please Note:** Although data subjects may wish for their data to be removed we have a Legitimate Interest to refuse this until after a six year period whereby any civil action either in connection with your case or in respect of any claim against us, will be statute barred. Beyond that date we routinely and automatically archive (erase) student data.

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 *SUMS*, *Jotform* 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.

TextAnywhere keep your mobile phone number archived for 365 days before permanent deletion.

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 SAC Service Managers
[Student Advice Centre](#) - www.nusu.co.uk/

0191 239 3979 student-advice-centre@ncl.ac.uk

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