**Privacy Notice: How the Centre for Wellbeing Handles Your Personal Data**

The Centre for Wellbeing is part of The University of Surrey*.* We are registered as a data controller with the Information Commissioner’s Office and are committed to ensuring that the personal data we process is handled in accordance with data protection legislation.The University has a named Data Protection Officer, Suzie Mereweather, who can be contacted via [dataprotection@surrey.ac.uk](mailto:dataprotection@surrey.ac.uk), the Centre for Wellbeing’s Information Asset Owner is the Interim Director of Wellbeing, Laura Smythson, who can be contacted on [l.smythson@surrey.ac.uk](mailto:l.smythson@surrey.ac.uk). The University has overarching privacy notices for staff and students which can be found by following these links [Student Privacy Notice](https://www.surrey.ac.uk/student-privacy-notice) and [Staff Privacy Notice](https://www.surrey.ac.uk/staff-privacy-notice)

1. **What information do we collect from you?**

The Centre for Wellbeing holds and processes personal data about its clients (staff and students at the University of Surrey).

The personal data we hold about you consists of:

* Name
* Identification number (URN or staff number)
* Date of birth
* Contact details
* Course details
* Gender
* Ethnicity
* Health/wellbeing notes from your appointments with Centre for Wellbeing professionals
* Completed questionnaires (CORE 34, PHQ9, GAD7)
* Dates of appointment
* Details of any follow up actions or referrals made
* Relevant correspondence, emails and documents
* Consent to share forms, if any

We only collect the data we need and keep that data up to date.

We receive this data from you when you complete the Centre for Wellbeing’s registration form, send in paperwork to us or request our service in some way (for example emailing us before you start as a student).

We also receive data such as name, date of birth, contact details, gender, health details, and referral details *from* third parties. These third parties are (but not limited to)

* Mental health services
* Voluntary organisations
* Medical Practitioners
* Previous education providers
* Internal University of Surrey schools, departments and services such as the wardens
* Police
* Colleagues/peers/family members/friends

We analyse geographic, demographic and other informationrelating to you from publicly available sources, such as Facebook, Instagram and other publicly available social media.

1. **Why do we collect this information?**

The Centre for Wellbeing and the University collects only the data we need and we keep the data up to date and only for as long as it is needed.

We collect your personal data in order:

* To provide accurate documentation of the services provided by the Centre for Wellbeing professionals
* To document third party referrals and communication
* To provide documentation of risk assessments and treatment
* To provide demographic information to analyse trends to improve service delivery
* To document consent to share details
* To support you in your request for certain services such as support on medical grounds, extenuating circumstances

Where we use the data we collect to make decisions about individuals or to analyse information on an individual level this is not shared with any third parties without your explicit consent, except in the circumstances outlined in paragraph 3, below.

1. **Lawful basis for processing (using) information**

We process your data in the legitimate interests of the University of Surrey. This purpose will never override your personal interests, fundamental rights and freedoms which require protection of your personal data.

We take our obligations for data handling very seriously and we only process your information when there is a legal basis for doing so. In most cases this is where we have explicit consent, putting you in charge of what and when your data is shared or collected allowing you to withdraw consent. More information can be found in the Centre for Wellbeing’s Consent Document.

In some situations we may need to process your data without your consent because we consider that it is in your vital interests to do so for example where we believe that you or a third party is at risk. We may also need to process without your consent where we would be liable to civil or criminal court procedure if the information was not disclosed for example the Prevention of Terrorism Act 2000 and 2006. In these circumstances we would do everything we reasonably could do to inform you and gain your consent and would only release information that was strictly relevant on a ‘need to know’ basis.

We may also process your data in the substantial public interest for the provision of health or social care, or treatment.

1. **What do we do with your information?**

The University processes personal data and special category data in accordance with data protection legislation and its own Data Protection Policy.

We use health information to provide an efficient, expert and holistic service for your treatment, care and wellbeing.

We use special category data relating to ethnicity and disability at a statistical level for improvements in our service to those with protective characteristics.

We analyse the effectiveness of our service at an aggregate level so that no individuals are identified from the data

We collate the responses you make to surveys so that we only use the data in a way that can’t identify individuals and do not use the individual responses you make to the survey.

1. **How long do we keep your information?**

We keep your personal data in accordance with the University’s retention schedules. This means that your data is kept for 7 years after the end of your contact with the service and is then destroyed or deleted.

1. **Who do we share your information with?**

Internally, under your consent, we share your personal and sensitive data with:

* Disability and Neurodiversity
* Departments/Schools/Faculty staff
* Security
* Professional services
* Any other named individual/department

In order to:

* Support your wellbeing and academic progress
* Appropriately refer into services
* To ensure your safety and the safety of others
* Enable seamless transition of care/support/co-ordination

Externally, with your consent, we share your personal and sensitive data with:

* NHS providers
* Police
* Educational institutions
* Any other named individual/service/team

In order to:

* Support and co-ordinate your wellbeing and academic progress
* Appropriately refer into services
* To ensure your safety and the safety of others
* Enable seamless transition of care

In all situations we document sharing details and documents on CORENet

There are occasions where me may need to share information without your consent for example if we believe that it is your vital interests to do so where we would be liable to civil or criminal court procedure if the information was not disclosed, as outlined in para 3 above.

1. **What rights do you have in relation to the way we process your data?**

You can find detailed information about your rights as a data subject on the University’s webpage [Guide to Subject Rights](https://www.surrey.ac.uk/information-management/data-protection/guide-data-subject-rights)

You have the right to ask us to confirm that your personal data is being processed and to access (i.e. have a copy) of that data as well as to be provided with supplemental information about the processing.

Where the data we hold on you is inaccurate, you may request that we rectify these inaccuracies.

You do not have the right to have your data erased by us as we must comply with a legal obligation as well as managing your health and social care. Visit the Information Compliance pages on the University website for more information.

You can withdraw your consent to process your data at any time by contacting your wellbeing practitioner. If you decide to do this, we will delete information such as your contact details and demographic information. However, we will need to keep the notes about your counselling/advice sessions together with your name for the reasons stated above.

We will keep the aggregate data which does not identify you within our datasets.

You have the right to object to the way we process your data. To exercise this right, please contact [dataprotection@surrey.ac.uk](mailto:dataprotection@surrey.ac.uk)

You have the right not to be subject to a decision based solely on automated processing including profiling where this decision produces legal affects or significantly affects you. There are some situations where this right does not apply as set out which are set out in the data subject rights information on the University’s webpage [here](https://www.surrey.ac.uk/information-management/data-protection/guide-data-subject-rights)