

Data Protection Privacy Notice

The University is committed to transparency and to complying with its responsibilities under data protection legislation.

- The Disability and Wellbeing Service processes your data in line with the university's [Privacy Notice Students Registered and Accepted Offer](#).

This privacy notice sets out important information regarding how we will use your information and details your rights under the legislation. It is important that you read this notice prior to providing your information.

The University of Strathclyde is a data controller under data protection legislation. Any enquiries regarding data protection should be made to the Data Protection Officer at dataprotection@strath.ac.uk.

Purpose of processing your personal data

We require to process your personal data in order to assess your needs, to identify support required and to put this support in place. This statement covers the processing of your personal data, including:

- referral information, including our Referral questionnaire
- evidence
- recommended adjustments for teaching and assessment
- assessment of needs
- referral to other services
- Disabled Students' Allowance (DSA) application

Lawful bases for processing

Under data protection legislation we are required to identify our lawful basis for processing, and in cases 'special category data'¹, which includes data relating to health, we require an additional lawful basis.

¹ Special category data' is personal data revealing: racial or ethnic origin; political opinions; religious or philosophical beliefs; trade union membership; genetic data or biometric data for the purpose of uniquely identifying a natural person; data concerning health or data concerning a natural person's sex life or sexual orientation.

Your data is processed in order to comply with the Equality Act, to meet our legal obligations under Section 20 'duty to make adjustments'.

The personal and special category data that you provide becomes part of your student record held by our service, and includes:

- Referral questionnaire
- Evidence
- Information provided as part of communications and meetings with our service

This data helps inform your:

- recommended adjustments for teaching and assessment
- assessment of needs
- referral to other services
- DSA application

Specifically, under GDPR our lawful bases for processing are:

6(a) consent, 6(b) contract, 6(c) legal obligation, 6(d) vital interests, 6(e) public interest

9(a) explicit consent, 9(h) provision of health treatment by Health professionals, 9(c) vital interests

Who do we share your data with?

If you require external services, for example, taxis or interpreter services, we will be required to provide only the information required to setup the service.

If you are recommended equipment, we will require to request a quote from the supplier and in order to do so will provide the company with your student registration number only. We would use this identifier in order to track your quote.

We will not make information about your disability or other special category data available out with our department without your agreement, for example:

- To submit your DSA application to your funding body
- To refer you to university services which are external to our department, such as, Sports Centre Induction programme.

Specifically, your **explicit consent** will be requested in the following instance:

- To make your recommended adjustments available to your Department via Pegasus

Retention Period

We will retain your record for a period of 6 years after you complete your studies or leave the university, in line with your central student record, after which your record will be confidentially destroyed.

The Disability and Wellbeing Service will retain anonymised data for our audit purposes.

Your Rights

You have the right to:

- Find out what personal data we process about you and obtain a copy of the data, free of charge within one month of your request. We may make a charge for additional copies of the same information;
- Ask us to correct inaccurate or incomplete data.
- Withdraw consent to process your personal data at any time, if you were asked for and provided consent (and where no other lawful basis for processing applies).
- Restrict the use of your data e.g. if you have raised issues about the accuracy or use of your personal data, until we have investigated and responded to your concerns;

You can withdraw your consent to make your recommended adjustments available to your Department. If you do so your recommended adjustments will be 'unpublished' and no longer available to your Department. However, as we require to evidence the supports that we have put in place, a record will be retained of recommended adjustments detailing dates that these were in place.

Right to Complain

If you have any concerns/issues with the way in which the University has processed your personal data you can contact the Data Protection Officer at dataprotection@strath.ac.uk. You also have the right to lodge a complaint against

the University regarding data protection issues with the Information Commissioner's Office (<https://ico.org.uk/concerns/>).

For your information:

The following excerpt from Appendix 1 of **Data Protection Privacy Notice for Students (Registered or Accepted an Offer to Study)** is provided for ease of reference of categories of processing particularly relevant to the Disability and Wellbeing Service.

For full details, please refer to Appendix 1 of [Data Protection Privacy Notice for Students \(Registered or Accepted an Offer to Study\)](#)

Category of Processing:

Duty of care/pastoral care obligations, legal obligations and statutory reporting

Category of Processing:	Disclosing information to third parties in emergency situations to protect your/someone else's best vital interests, e.g. a medical emergency
Lawful basis for personal data:	Vital interests of the data subject or another person.
Lawful basis for special category data:	Vital interests
Category of Processing:	To provide counselling and health services
Lawful basis for personal data:	Public interest, contract, Legal obligation, Vital interests, consent
Lawful basis for special category data:	Consent, Provision of health treatment by health professional, Vital interests, Substantial public interest
Category of Processing:	To provide counselling and health services
Lawful basis for personal data:	Public interest, contract, Legal obligation, Vital interests, consent
Lawful basis for special category data:	Consent, Provision of health treatment by health professional, Vital interests, Substantial public interest

Category of Processing:	To comply with obligations under equality legislation. – if you choose to disclose a disability to access support we have a legal obligation to disclose this information on a need-to-know basis to staff to ensure that reasonable adjustments are made and that you do not have to disclose the same information again.
Lawful basis for personal data:	Legal obligation (Equality Act 2010), Consent
Lawful basis for special category data:	Substantial public interest (Equality Act 2010), consent
Category of Processing:	Fulfilling statutory reporting requirements, e.g. Higher Education Statistics Agency (HESA). See HESA's Collection Notices