



cysylltu | connect

**General Data Protection
Regulation
Privacy
statement
December
2020**

Policy Title: CONNECT General Data Protection Regulation Privacy Statement
University Directorate: Student Services
Service: Inclusive Student Support Services (ISSS) (Swansea University) and Student Services (UWTSD)

Reason for Policy: To ensure compliance and clarification to individuals under the General Data Protection Regulation (GDPR) 2020

Date reviewed: December 2020

Next review due: December 2021

Date approved:

Approved by:

Contents:

| Content | Page |
|---|-------------|
| Contents | 1 |
| Privacy Notice | 2 |
| What kind of information do we collect? | 2 |
| Why we collect individual data | 3 |
| How your information will be use | 3 |
| How data is processed | 3-4 |
| How long will your information be held | 4 |
| Security of your information | 4 |
| What are your/an individual's right | 4 |
| Withdrawing consent | 4-5 |
| How to make a complaint | 5 |
| Further questions | 5 |

CONNECT Privacy Notice

The CONNECT Project is a newly funded, institution wide, wellbeing project, aiming to reduce loneliness and isolation amongst students. There is strong evidence suggesting that students are becoming increasingly isolated, which if tackled early on, could reduce the risk of further psychological or social issues. Our vision is that all students will feel, and will be, connected. CONNECT aims to build supportive institutional communities by working with both staff & students to lay the foundations for lifelong positive and healthy behaviours.

The CONNECT project has been set up in both Swansea University and University of Wales Trinity Saint David (UWTSU). It is embedded within the Student Services department at each university. Swansea University and University of Wales Trinity Saint David are the joint data controllers and are committed to protecting the rights of individuals in line with the UK Data Protection Act 1998 (DPA) and the new General Data Protection Regulation (GDPR)(2018) with Swansea University acting as the lead partner. Both universities have Data Protection Officers who can be contacted through email on: dataprotection@swansea.ac.uk or paul.osborne@uwtsu.ac.uk

We take the collection, storage and use of personal data very seriously. In this document, you will find an explanation of why CONNECT collects individual data, how we process it and the steps we take to ensure data security at all stages.

What kind of information do we collect?

We collect the following information from individuals accessing the CONNECT Project:

We collect the following data from students registering for support, advice, intervention, mentoring or participation in other activities the service may offer:

- Name
- Student Number;
- Email address
- Institution Details

We collect the following data from student Connectors;

- Name
- Student Number;
- Date of birth;
- Gender;
- Country of birth;
- Contact details;
- Institution & course details;
- Interests;
- Societies;
- Availability
- Information about any activities you have undertaken

We collect the following data from staff Connectors:

- Name
- Job title
- Contact details
- Location at work
- Information about any activities you have undertaken

Why we collect individual data

Students accessing support:

Our legal basis for processing student's personal data is that an individual will have given consent to the processing as part of a signed consent statement on the personal details form completed when approaching CONNECT for support. Data may be used as part of regular audit and quality control of our services, for training purposes, and for project evaluation.

Student & Staff Connectors:

We collect data from student & staff Connectors to i) assess their suitability for the project ii) register them for training iii) register them as volunteers iv) provide information for students to get in touch with Connectors for support v) monitor any activity that has been undertaken as part of the project vi) project evaluation. Our legal basis for collecting this information is legitimate interests as collection of this data is necessary for the day to day running of the CONNECT project.

Any information provided by students will only be used for the purpose for which consent has been obtained. Individuals will be asked to give separate consent for every data processing activity that is undertaken or if disclosure is required outside of Inclusive Student Support Services (ISSS) (Swansea University) or Student Services (UWTSD). In extremely rare circumstances we may have to reveal information to others e.g. when an individual is at risk of serious physical harm or death, a child is in danger, another student has committed a crime against an individual or acts of terrorism are being planned. Should such a need arise to disclose information, in the majority of circumstances we would discuss directly with the individual making the disclosure when we need to do this. All disclosures will be handled in line with data protection legislation.

How your information will be used

1. Information that is collected will be used to evaluate the project and record who is using the service. CONNECT may be required by Swansea University or University of Wales Trinity Saint David to produce statistical information which is generated by our computerised records systems. Research may also be carried out on statistics that are created by our work with individuals. All data and research information presented to anyone outside the Inclusive Student Support Services (ISSS) (Swansea University) or Student Services (UWTSD) group will be anonymous, in order to preserve individual confidentiality.
2. For the purposes of; safeguarding, promoting the welfare of student's and maintaining student safety and security.
3. For the purposes of monitoring; which allows us to fulfil compulsory external auditing and reporting requirements to regulatory bodies such as HEFCW.
4. To help CONNECT staff run the services effectively and to continuously improve what we do.

How data is processed

- i. To access CONNECT, enrolled Swansea University and University of Wales Trinity Saint David students are asked to complete the registration form via the website, or email.
- ii. To become a Connector, students and staff enrolled at Swansea University or UWTSD are asked to complete and Expression of Interest form via the website
- iii. These forms are stored on the CONNECT system and which can only be accessed and viewed by authorised personnel.
- iv. All files containing student data and information are stored in the relevant secured service file area. Access to these areas files is restricted to members of the relevant team and, on occasion, designated staff working within the Inclusive Student Support Service (ISSS) (Swansea University) or Student Services (UWTSD) group.
- v. Information shared with other teams and departments within Swansea University or University of Wales Trinity Saint David, for the purpose of providing a service to individuals will only be shared where it is in the legitimate interests of the parties to share the information in order to provide the required service, except in the case of an emergency and is permitted by Data Protection Legislation.

- vi. Data may be shared externally only if permitted by Data Protection Legislation.
- vii. We will not respond to requests from tutors/academic or administration staff, family members or friends for information, not even disclosing attendance or engagement with CONNECT (unless explicit consent has been obtained to do so or if it is necessary and permitted by Data Protection Legislation.)
- viii. In extremely rare circumstances we may have to reveal information to others without consent, but only if permitted by Data Protection Legislation. Please see the “why we collect individual data” section above for further details about this.

How long will your information be held?

CONNECT will retain personal information in line with the University records management procedure which can be found at <http://www.swansea.ac.uk/the-university/world-class/vicechancellorsoffice/compliance/recordsmanagement/>

Any information concerning an individual provided to us will be held securely for 7 years and thereafter will be destroyed unless we have had a specific request via the University’s data protection officer.

Security of your information

Data protection legislation requires us to keep individual’s information secure. This means that an individual’s confidentiality will be respected and, all appropriate measure will be taken to prevent unauthorised access and disclosure. Only members of staff who need access to relevant parts or all the information we hold will be authorised to do so. Information about individuals in electronic form will be subject to password and other security restrictions, while paper files will be stored in a secured area with controlled access.

Some processing and storage may be undertaken on the University’s behalf by an organisation contracted for that purpose. Organisations processing personal data on the University’s behalf will be bound by an obligation to process personal data in accordance with Data Protection legislation.

What are your/an individual’s rights?

Individuals have a right to access their personal information, to object to the processing of their personal information, to rectify, to erase, to restrict and to port their personal information. Please visit the University Data Protection webpage for further information with regards to your individual rights.

Swansea University: <https://www.swansea.ac.uk/about-us/compliance/data-protection/your-rights/>

Or University of Wales Trinity Saint David <https://uwtsd.ac.uk/data-protection/>

Withdrawing Consent

Individuals have the right to withdraw consent at any time. If for any reason individuals wish to withdraw consent, we ask that this request is submitted in writing to:

CONNECT, Swansea University, Horton House, Singleton Park, Swansea, SA2 8PH or via email to: connect@swansea.ac.uk

Or

CONNECT, University of Wales, Trinity Saint David, Carmarthen Campus, Carmarthen, SA31 3EP
cysylltu-connect@uwtsd.ac.uk

Individuals will be asked to complete a Request to Withdraw Consent form and return it to the service in writing, so we can ensure that individuals understand what is meant by withdrawing consent and what will happen next.

Any other requests or objections should be made in writing in the first instance to:-

University Compliance Officer (FOI/DP,) Vice-Chancellor’s Office, Swansea University, Singleton Park, Swansea, SA2 8PP Email: dataprotection@swansea.ac.uk

Or

Paul Osborne, Head of Data Protection, University of Wales Trinity Saint David, Swansea Business Campus, Swansea, SA1 1NE Email: paul.osborne@uwtsd.ac.uk

How to make a complaint

If an individual is unhappy with the way in which personal information has been processed individuals may in the first instance contact:

University Data Protection Officer (FOI/DP,) Vice-Chancellor's Office, Swansea University, Singleton Park, Swansea, SA2 8PP Email: dataprotection@swansea.ac.uk

Or

Paul Osborne, Head of Data Protection, University of Wales Trinity Saint David, Swansea Business Campus, Swansea, SA1 1NE Email: paul.osborne@uwtsd.ac.uk

If an individual remains dissatisfied, then they have the right to apply directly to the Information Commissioner for a decision. The Information Commissioner can be contacted at: -

Information Commissioner's Office: Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
www.ico.org.uk

Further questions?

If you have further questions about how we process individual data, please feel free to get in touch with William Edwards, CONNECT Digital Developer, w.h.edwards@swansea.ac.uk