## **FoNS Student Wellbeing Advice Team**

## **Privacy Notice**

## We will collect:

- 1. Your name, CID number, Imperial email address, postal address, contact number, reason for referral, preferred date for and method of appointment (in person or virtual) and when it's best to arrange an appointment with you via the referral form.
- 2. A summary of the content of your discussion with the student wellbeing adviser during your appointment(s).

We collect your personal data in 1. via the referral form and your personal data in 2. via case notes produced by our student wellbeing advisers.

We collect the personal data above to provide you with the student wellbeing services requested and to monitor student need and trends related to users of the service to improve what we offer.

We rely on the following legal bases to process your personal data:

- It's necessary for the performance of a contract with students (UK GDPR Article 6,(1)(b)). Our
   Registration Terms and Conditions state that we are working hard together with Imperial
   College Union to make sure that you have the best possible experience beyond your studies.
   Full details of the student community, wellbeing support, careers support and extracurricular
   activities available during the academic year are published online. FoNS student wellbeing
   advice team is part of the wellbeing support the college provides to students and it's created
   in response to student feedback.
- It's necessary for the performance of a task carried out in the exercise of official authority vested in us in our <a href="Charter and statutes">Charter and statutes</a> (UK GDPR Article 6,(1)(e)). The processing supports us in fulling the provost's responsibility for student life and well-being and for such other duties as may be prescribed by Ordinance or determined by the Council from time to time.
- It's necessary to comply with a legal obligation that we are subject to(UK GDPR Article 6,(1)(c)). For example,
  - the common law duty of care to deliver our educational and pastoral services to the standard of the ordinarily competent institution, and in carrying out our services and functions, to act reasonably to protect the health, safety and welfare of our students
  - our duty under Health and Safety at Work Act 1974 to do everything reasonably practicable to ensure the health and safety of our students
- It's necessary in order to protect the vital interests of you or of another individual(UK GDPR Article 6,(1)(d)). If there's a concern about protecting your life or the life of others, we may disclose your personal data to your emergency contact or a third party, such as a member of the emergency services in the event of an accident or emergency medical admission. We will work with relevant teams in the college to use the <a href="emergency contact services">emergency contact services</a> according to our <a href="emergency contact services">student emergency contact policy and procedure</a>.
- You have given consent for us to approach your emergency contact if there is a serious
  concern of your wellbeing(UK GDPR Article 6(1)(a)). If there is a serious concern of your
  wellbeing and you have given consent for us to approach your emergency contact, we may
  disclose your personal data to your emergency contact. We will work with relevant teams in
  the college to use the emergency contact services according to our student emergency
  contact policy and procedure.

We rely on the following legal bases to process your special category personal data:

This privacy notice was last updated in March 2023.

- It's necessary for the purpose of carrying out obligations in the field of employment and social security and social protection law (UK GDPR Article 9(2)(b)). For example, the provision of student wellbeing advice service is necessary for us to fulfil:
  - our common law duty of care to deliver our educational and pastoral services to the standard of the ordinarily competent institution, and in carrying out our services and functions, to act reasonably to protect the health, safety and welfare of our students
  - our duty under Health and Safety at Work Act 1974 to do everything reasonably practicable to ensure the health and safety of our students
- It's necessary to protect the vital interests of the student or of another natural person where the student is physically or legally incapable of giving consent(UK GDPR Article 9 (2)(c)). If there's a concern about protecting your life or the life of others and you are physically or legally incapable of giving consent, we may disclose your personal data to your emergency contact or a third party, such as a member of the emergency services in the event of an accident or emergency medical admission. We will work with relevant teams in the college to use the emergency contact services according to our student emergency contact policy and procedure.
- You have given explicit consent for us to approach your emergency contact if there is a
  serious concern of your wellbeing(UK GDPR Article 9(2)(a)). If there is a serious concern of
  your wellbeing and you have given consent for us to approach your emergency contact, we
  may disclose your personal data to your emergency contact. We will work with relevant teams
  in the college to use the emergency contact services according to our student emergency
  contact policy and procedure.

We review your personal data on an annual basis and only keep it for duration of your registration plus any gap between the end of your registration and the annual review date. Your personal data will be manually deleted after this retention period.

Appropriate access control and encryption have been put in place to safeguard your personal data. Only the FoNS student wellbeing advice team will be granted access to your referral form and case notes. In this process, we may occasionally need to share a summary of your case to other relevant, key roles to provide you with the best support. If this is necessary we will normally discuss this with you before sharing the data. For example, this could happen if:

- we need to discuss your mitigating circumstances with your Department Senior/ Postgraduate Tutor.
- we need to make a referral to other college services

In addition, if there is a serious concern for your wellbeing or a concern about protecting your life or the life of others, we may disclose your personal data to your emergency contact and/or third parties as described above.

Your personal data will be stored in the UK and EEA. The only time your personal data might be transferred outside of the UK and EEA would be if there is a need to contact your emergency contact(s) and they are based outside of the UK and EEA. The contact process is handled by other teams according to our <u>student emergency contact policy and procedure</u> and please refer to our privacy notice for students and prospective students below for more details of safeguards for international data transfer.

For more information of how Imperial handles your personal information, please see our <u>privacy</u> notice for students and prospective students.