

Data Protection: Layered Privacy Notice Student Counselling Services

Edinburgh Napier University is providing you with this information in order for us to comply with the General Data Protection Regulation (EU) 2016/679, which requires us to tell you what we do with your personal information.

The University provides a dedicated and confidential Counselling Service to students to provide support and work with students towards resolving any problems or difficulties being encountered whilst studying at the University.

Who is collecting the information?

Edinburgh Napier University as the “Data Controller”.

Who are we sharing your Personal Data with?

1. CORE Management is the electronic system which the University’s Counselling and Mental Wellbeing team uses to process information required to provide their services. It is a system management data base, which holds personal information, contact details and evaluation systems. The system provider is a data processor.
2. Big White Wall general use no sharing of personal data (staff and students can register individually with BWW online to use ‘the wall’ – service paid for by the University).
Big White Wall Online Counselling (University Counselling Service refers students for online counselling) requires the service to share:
Student’s full name
Student’s email address
Student personal contact number
Student’s GP details (GP address, GP name and number)
Referral information:
Recommended treatment i.e., CBT and Counselling
Any presenting risk issues
Brief summary of student’s initial assessment including:
Main issues/ area of difficulty, duration and onset
Previous treatment/ contact with university services or other mental health services
Initial goal for therapy, if known
3. Silver Cloud
Unsupported version (individual directed use) no data exchange except in safeguarding instances.
Supported version (Counselling services referred) user interacts with system with feedback from counselling service.
Wellspring Scotland - data exchange for Safeguarding and payment purposes.

Why are we collecting it/what we are doing with it (purposes)?

1. Clinical and therapeutic purposes
2. To manage student wellbeing, concern and risk
3. Administrative and statistical purposes

What is the legal basis for processing?

Services are provided by the University's Counselling and Mental Wellbeing team on the request of individuals (data subjects).

The legal bases for processing are:

- 1) Art 6.1.(c) – for compliance with a legal obligation, namely the Equality Act 2010
- 2) Art 6.1.(e) – for the performance of the University's public task, namely the provision of education, providing support and ensuring adjustments are made where appropriate to facilitate the provision of education.
- 3) Art 9.2.(h) – for the purposes of the provision of health systems and services. The University adheres to the code of ethics of the British Association of Counsellors and Psychotherapy (BACP)
- 4) Art 9.3. – personal data may be processed under this condition when the data are processed by or under the responsibility of a professional subject to the obligation of professional secrecy by UK law or by rules established by BACP (British Association for Counselling and Psychotherapy) and COSCA (Scotland's professional body for counselling and psychotherapy).
- 5) DPA 18 Section 10(3) and Schedule 1(17) processing of special category personal data is necessary for the provision of confidential counselling, advice or support, etc.

How are we collecting this information?

By auto-populating or manually inserting the registration form with associated personal information and by the use of assessment tools and counselling and mental health advice notes

You will complete the registration form online and the service will revisit the contract information/ data protection information at service assessment.

What information are we collecting (whose information and what type of personal data)?

- Who; Edinburgh Napier Students accessing Student Counselling and Mental Health Advice
- What; name, contact details, address, gender, ethnicity, nationality, date of birth, matriculation number, course information, disability, GP details.
- Clinical data- CORE wellbeing psychometric test, pre and post assessment, session, risk and concern notes, services accessed

Who can see your information within the University?

A – Counselling and Mental Wellbeing Staff and Management.

The Counselling Service and Mental Health Advice have a strict codes of confidentiality and will not pass on any information regarding your counselling or mental health advice unless in exceptional circumstances that includes significant risk to self or others (please see counselling and mental health advice contract/ agreement).

The counselling service is guided by British Association for Counselling and Psychotherapy ethical guidelines.

You can view the BACP ethical framework at:

http://www.bacp.co.uk/ethical_framework/ethics.php

How long is your information kept?

10 years from the date users first access the service

How secure is your information?

Highly secure; password and fob protected where the fob changes log in details at every login. Clear guidance in regards to where to access information.

Information is also kept on Edinburgh Napier's secure system which is access protected (only approved staff working for the service has been granted access).

The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation.

Who keeps your information updated?

- Service administrator
- Service users are required to update their information with the service where there is any relevant change to their personal details

Will your information be used for any automated decision making or profiling?

No

Is information transferred to a third country? Outside the EEA and not included in the adequate countries list.

No

Is any other information available?

You can access all the University's privacy notices using the following link:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx>

You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL:

<https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx>