

Data Protection: Layered Privacy Notice Disability and Inclusion Services

Edinburgh Napier University is providing you with this information to comply with UK Data Protection legislation, which requires us to tell you what we do with your personal information.

The Disability Inclusion team supports students with disabilities, specific learning difficulties and long-term health conditions. We process personal data to provide students with support, across the University and through selected external agencies, and ensure that the necessary adjustments are made to facilitate your studies and student experience. We might also use your information to help us respond to our wider duty of care towards you as one of our students. That includes us considering your overall safety and welfare.

Activities and processing being undertaken:

- Collecting personal data to enable us to offer support and make necessary adjustments
- Sharing information with lecturers, with other university support services and with university student accommodation services, as necessary and appropriate.
- Sharing information with agencies providing assessed course placements.
- One-off referrals to outside agencies.
- Referrals to outside agencies for on-going support.

We are a part of the Student Wellbeing & Inclusion Department and work alongside other support teams – where appropriate we may share information with each other to offer you the best quality of holistic support.

Who is collecting the information?

- Edinburgh Napier University as the “Data Controller”.

Who are we sharing your Personal Data with?

To arrange your support, we may need to share information about you, including:

- Information about support you might need for classes and coursework: lecturers and your School Disability Contact.
- Information about support you might need for tests and exams: lecturers, your School Disability Contact, the exams team.
- Information about safety measures we might need to take: health & safety team, lecturers, your School Disability Contact.
- Information about support you might need in student accommodation: student accommodation team, health & safety team.
- Information to support your application for Disabled Students’ Allowance: your student funding body (SAAS, SFE, SFNI, SFW) and the access centre carrying out your needs assessment.
- Information to support your application for the Fund for Students with Disabilities: the Higher Education Authority.

- Information about your additional support requirements: external agencies providing specialist one-to-one support workers.
- Information about support you might need on work placements: placement supervisors, placement providers, your School Disability Contact.
- Information about support you might need on overseas study opportunities: Global Mobility team, host institution.
- Information about your general welfare or safety: colleagues in the Student Wellbeing & Inclusion department, Director of Student Services & Academic Registrar.

The University undertakes to maintain your information securely and will restrict access to employees, our professional advisers, authorised agents and contractors on a strictly need to know basis. There may be circumstances where we are required to disclose your data to other external third parties, including where we:

- have serious cause for concern for your safety,
- are required to do so under a statutory or legal obligation, or
- are permitted to do so by Data Protection legislation.

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

- Provision of support.
- Administrative and statistical purposes.

What is the legal basis for processing?

- Services are provided by the University's Disability Inclusion team on the request of individuals (data subjects).
- The legal bases for processing under the UK GDPR are:
 - Article 6.1(c) – for compliance with a legal obligation, principally the Equality Act 2010;
 - Article 6.1(e) – for the performance of the University's public task, namely the provision of education, ensuring adjustments are made where appropriate to facilitate the provision of education
 - Article 9(2)(g), as permitted by under section 10(3), and paragraph 16 of schedule 1, of the Data Protection Act 2018 for the processing of special category (sensitive) personal data for the purposes of providing support to individuals with particular disabilities or medical conditions

How are we collecting this information?

- Information will be collected from you, either through your direct involvement, e.g. during appointments, or indirectly, e.g. using information already gathered from yourself and held on the University's record systems.
- Additional information will be collected from partner agencies, including Educational Psychologists, the Edinburgh College Access Centre and personal support providers, to which we might refer you.

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

- Data specifically relating to you, your disability / SPLD / long-term health condition, and any associated support needs.

Who can see your information within the University?

- Disability Inclusion Staff.
- Some information will be shared with Student Accommodation Staff (to facilitate provision of any accommodation requirements you have).
- Some information will be shared with Health & Safety staff (to facilitate provision of any safety arrangements you require).
- Some information will be shared with lecturers, chiefly in the form of your learning profile.
- Some information might be shared with external partner organisations, including placement providers and NMPH agencies.

How long is your information kept?

- 6 years after completion of studies.

Further information can be found online at:

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

Who keeps your information updated?

- Disability Inclusion staff, and staff at the agency/agencies stated above, as responsible for ensuring that your information is kept up to date.
- Students using the services are responsible for advising staff of changes to their personal data and/or circumstances to ensure their record is accurate.

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

- No.

Is information transferred to a third country which is outside of 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/governancecompliance/governance/DataProtection/Pages/default.aspx>

Dec 2021