

advice (su) privacy policy

This policy sets out how advice (su) collects, stores and uses information about you and complies with the law on data protection, specifically:

- The legal basis for data processing
- What personal data we collect about you
- How we collect your data
- What we use personal data for
- How we store personal data and keep it safe
- How long we keep your personal data
- Your rights in relation to the data we hold

Definitions

Data protection legislation means the Data Protection Act 1998 as long as it is in force and thereafter the General Data Protection Regulation (Regulation (EC) 2016/679 which comes into force in the UK on 25 May 2018) (GDPR) and any national implementing laws, regulations and secondary legislation, as amended or updated from time to time, in the UK and then any successor legislation to the GDPR or the Data Protection Act 1998

Data subject (you) means the individual that is subject of any personal data, e.g. the client accessing advice(su)

Data processor (advice(su)/"we"/"us") means the person or entity responsible for processing personal data on behalf of a controller

Data controller (Information and compliance manager): means the person who determines the purposes and means of processing personal data. The Information and Compliance Officer is Toby Cunningham. You can contact him at toby.cunningham@uea.ac.uk

Processing means any operation or set of operations which is performed on personal data or on sets of personal data, whether or not by automated means, such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Personal data means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.

Consent of the data subject means any freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.

Special category data means data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, 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.

Student contact form means the paper or electronic form we ask you to use to provide your contact details

Further definitions can be found here. <https://gdpr-info.eu/art-4-gdpr/>

Legal basis for data processing

advice(su) has a legitimate interest (Article 6 GDPR) in processing your data, including enquiry/case details. It is necessary for us to protect your interests as well as the interests of the service. You have the right to complain if the advice you receive was incorrect or unsatisfactory. Without storing client data, including case details, you may find it difficult to seek redress. **advice (su)** requires your data in the event of a complaint so we can check that the appropriate advice was provided.

There are situations where we will also ask for your consent. These are:

- To obtain details about you from the UEA SIS system
- To discuss your case with a third party such as a member of university staff
- To pass information to a new adviser instructed by you
- To request feedback on our service

You can withdraw consent at any time by contacting **advice(su)** directly or completing another student contact form.

We will never share your data with a third party unless you have provided explicit written consent or we have a legal obligation to do so. Please refer to our [Service Level Policy](#) where we explain our policy on confidentiality to more detail.

What data do we collect about you?

- Your personal contact details, including student ID number, email address and phone number and details of the course you are studying
- Information provided by you when requesting advice or a foodbank (su) parcel. This could include information about personal matters such as your finances, nationality, health or a disability if they are relevant to your query
- Data from SIS (see below)

How we collect data about you

We collect data about you in four ways:

- directly from you on our student contact form (or foodbank (su) record form) and in the course of advising you
- directly from a person/third party you have given consent to share information with us
- anonymously on our equality and diversity monitoring form. This information is stored separately from your case file and no details which identify you individually will be stored.
- from your SIS record. We have a data sharing agreement with the University to access certain basic details about you on SIS. This includes your student number, name, term time address, student email, date of birth, gender, whether or not you are an international student, nationality and course details. This has been set up so that we can provide the best service for you, and you don't need to go through it all directly with us. If you have any questions about this contact the University's Data Protection Officer.

What we use your data for

We use your data to:

- contact you about your case
- ensure we understand your circumstances and can give you advice on your options
- supply you with information you have requested
- ensure continuity of service in the absence of a member of staff who has worked on your case
- have a record of advice in case you need further advice in future

- allow quality control and supervision of advice work
- assist you with formulating appeals, complaints or take other steps to progress your case

We may also use your data anonymously (where your individual details cannot be identified)

- for monitoring and statistical purposes
 - to enable us to ensure that we provide a service to accessible all members of the student body and
 - help us can identify tends and patterns to enable us to plan enhancements to our service and undertake prevention work.

We will not:

- use your data for marketing purposes
- request or use any genetic or biometric data about you
- carry out any automated data processing
- share your personal data without your express consent unless we are required to do so by law or if we believe that you are at risk of harming yourself or someone else (Please see our [Service Level policy](#) for a full explanation of our confidentiality policy)

How we store personal data and keep it safe

There are three places we store your personal data:

1. in a secure case management system (**Advicepro**)
2. in **Microsoft Outlook** when you or anyone else emails us about your case
3. in a **Microsoft Excel** waiting list.

Case files and casework

We upload all documents relating to your case onto Advice Pro, our secure casework management system. This system can only be accessed by trained advice(su) staff via password. We do not keep paper files on cases.

We also upload all emails and any other correspondence we have with you or others about your case so that we can monitor and refer to the advice we have given to you at any stage of your case

Within a case file an Advice Worker may record special category data if relevant to your case. This data will not be used for reporting, nor published within a case study unless you give your explicit consent. This consent is recorded via Advicepro.

Hard copy data, such as your student contact form, and any paper copies of documents you give us, are scanned and stored on Advicepro, and the hard copies are shredded. Where an Advice Worker prints a hard copy of a document (for example to prepare for a meeting) the hard copy will be shredded after use or placed in a locked confidential waste bin for later shredding.

Handwritten notes are either transcribed or scanned and uploaded to Advicepro and then destroyed

Copies of foodbank (su) request forms and Norwich Foodbank Vouchers are stored securely on Advicepro. Originals of Norwich Foodbank vouchers returned to Norwich Foodbank by post and kept securely in accordance with their Data Privacy Statement for Foodbank Clients

Advice Pro advocates privacy by design and as such annually employ the NCC Group to undertake penetration testing, one of the top three companies providing the service. Advicepro is a highly trusted case management system with the advice sector and is fully compliant with the GDPR

Waiting list

We record your name, student number, and contact phone number on our **Microsoft Excel** waiting list database if you wish to be placed on the list for a cancellation appointment. The nature of your enquiry is not recorded on this database and it is password protected. These details are deleted after 5 working days.

Data security in the office

All staff are individually responsible for locking their PC when left unattended and locking any written case notes or client documents in their desk drawers when the office isn't in use

Deletion of data

We retain electronic data on Advicepro for six years after a case is closed. The requirement to hold data for at least six years is both to protect you (you may discover years later that their advice was inaccurate and therefore seek redress) and to protect us (without records we will have no evidence to check whether the case is correct or not).

Emails relating to you will be deleted once uploaded to Advicepro or in any event no later than 6 years from the date sent.

All electronic data, including case files, are automatically archived by Advicepro on a monthly basis six years after the case/enquiry was closed. All identifying data is removed and marked as archived. All cases and enquiries are removed along with any case notes and these are marked as archived. An archived client, case or enquiry will no longer appear in search results, however the clients and cases still exist in the database so the Head of Advice can still search the non-identifying data. This allows the Head of Advice and advice(su) staff to run longitudinal reports to aid in identifying trends.

Breach notification

Advicepro have a procedure in place in the event of a data breach. The Head of Advice is responsible for ensuring the primary contact details held by Advicepro are up-to-date to ensure there is no delay in reporting a data breach. If a member of advice(su) staff is informed of a data breach involving Advicepro then they are to alert Advicepro immediately via dataprotection@acm-solutions.co.uk. As well as informing Advicepro we are also required to inform the Information Commissioners Office (ICO) ideally within 72 hours and the client/s affected.

Your rights in relation to the data we hold

Right to object

You have the right to object to us processing your data in the way we have described in this policy. If you object, we will not keep a record of your contact with us but we will only be able to offer general advice and will not be able to undertake ongoing casework on your behalf.

Access

You have the right to an electronic copy of your data and to know whether or not personal data concerning them is being processed, where and what for. Clients wishing to have a copy of their data can email advicecentre@uea.ac.uk with their request. Once we have confirmed that you are an advice (su) client we will provide, free of charge, an electronic copy of your data, including all case files within one month of the request. We will ask you to confirm your identity before sending you the copy.

Right to Rectification

If you think the data we hold for you is incorrect you should complete a new student contact form with the correct details and we will update your record. Alternatively, contact us and discuss the updates required. We will require confirmation of your identity before making any changes.