

## Privacy Notice for the Counselling, Mental Health and Wellbeing Services

This Privacy Notice explains who we are, how and why we collect and use personal information about you, what personal data is collected and held about you in the Counselling, Mental Health and Wellbeing Services database, our purposes and lawful bases for processing, who we share your personal data with, relevant retention periods, and how you can exercise your privacy rights.

This notice provides information that is in addition to information contained in the University's Student [Privacy Policy](#). Please do read this notice to understand our practices and if you have any questions please contact us using the contact details provided below.



### Who we are

Throughout this notice, "University", "we", "our" and "us" refer to the Manchester Metropolitan University, an exempt charity under Schedule 2 to the Charities Act 1993 (amended by the Charities Act 2011). The University is the Data Controller in respect of the personal data you provide as part of using our Counselling, Health and Wellbeing services.

The University is registered as a Data Controller with the Information Commissioner's Office (ICO). We manage personal data in accordance with the General Data Protection Regulation (GDPR) and the University's Data Protection Policy.



### The personal data we process

We collect and process certain data about you, including information of a sensitive nature. This includes :

- The information you provided when you made first contact with us (whether in person, by telephone, email or any other form of communication).
- The information you provided when you completed the Service Registration Form (including your name, date of birth, address, phone number, your GP and whether you have a disability).
- A record of each contact we have had with you (whether in person or otherwise, scheduled appointment, drop-in or other), including short notes about each contact.
- To ensure that our Service is accessible to all of our student population, our Service Registration Form also gives you the option to provide information to support equality and diversity monitoring (such as your age, ethnicity, gender identity, religion, sex, sexual orientation and whether you have a disability).



### The purposes of the processing and lawful basis

Your information will enable us to:

Use of personal data	Lawful basis
<ul style="list-style-type: none"> <li>▪ Confirm that you are a student.</li> <li>▪ Register you as a client of the Counselling, Mental Health &amp; Wellbeing Services.</li> <li>▪ Carry out an 'open door' drop-in, initial assessment or other scheduled appointment with you by any of the Counselling, Mental Health &amp; Wellbeing team.</li> <li>▪ Make a record of each contact we have with you (whether in person, telephone, email or other means).</li> <li>▪ Carry out any administration relating to your contact with the Counselling, Mental Health &amp; Wellbeing Services.</li> <li>▪ Write any letters or emails to third parties on your behalf and with your prior agreement.</li> </ul>	<p><b>Performance of a contract:</b> we need to collect and process certain information from you in order to effectively deliver our counselling and wellbeing services to you in accordance with the Student contract.</p> <p><b>Public task:</b> In order to a perform our counselling and wellbeing services, as a public authority acting in the public interest.</p>

<ul style="list-style-type: none"> <li>▪ Make any telephone calls to third parties on your behalf and with your prior agreement.</li> <li>▪ Deal with your enquiries and to make contact with you when you request an appointment or other service with the Counselling, Mental Health &amp; Wellbeing Services.</li> </ul>	<p>This is to protect you, to enable us to deliver an efficient service, and to comply with the British Association for Counselling and Psychotherapy Ethical Framework for the Counselling Professions.</p> <p>Data Protection Act 2018 Schedule 1, Part 2 – s17 – necessary for the provision of a confidential counselling service.</p>
<ul style="list-style-type: none"> <li>▪ Handle any complaints you may have so that we can improve our business.</li> </ul>	<p><b>Legitimate interests:</b> we process personal data for these purposes in ways which you would reasonably expect and which we believe have minimal privacy impact. We need to collect and retain certain information from you in order to ensure your safety and wellbeing, and to comply with any legal obligations.</p>
<ul style="list-style-type: none"> <li>▪ Invite you to provide feedback on our service and participate in surveys.</li> </ul>	<p><b>Consent:</b> we offer you a real choice and control whether you wish to participate in these activities. We ask for your consent when you complete the Service registration form.</p>
<ul style="list-style-type: none"> <li>▪ Determine whether any adjustments need to be made for you if you have declared a disability.</li> <li>▪ Take account of, and provide additional support for, any disabilities, health issues or conditions.</li> </ul>	<p><b>Legal obligation:</b> under the Equality Act 2010 we are obliged to consider reasonable adjustments and offer support on the grounds on health and disability.</p>
<ul style="list-style-type: none"> <li>▪ Safeguard residents, staff and other third parties on our sites.</li> </ul>	<p><b>Public task:</b> In order to a perform specific task which is in the public interest and has a basis in law.</p>
<ul style="list-style-type: none"> <li>▪ Protect your vital interests, or those of another party, in an emergency situation.</li> </ul>	<p><b>Vital interests:</b> in the event of significant concerns for your immediate wellbeing we may contact others who may be in a position to support you, typically your GP or other medical professionals. We would always seek to discuss this course of action with you but if our concerns are for your immediate safety we may do so without your consent.</p>
<ul style="list-style-type: none"> <li>▪ Undertake equality and diversity monitoring of users of our services to seek to ensure they are accessible to all our student population.</li> </ul>	<p>Data Protection Act 2018 Schedule 1, Part 2 – s8 – necessary for the purposes of identifying or keeping under review the existence or absence of equality of opportunity or treatment.</p>



## The right to withdraw consent

If we have collected and process your personal information with your consent, then you can withdraw your consent at any time. Withdrawing your consent will not affect the lawfulness of any processing we conducted prior to your withdrawal, nor will it affect processing of your personal information conducted in reliance on lawful processing grounds other than consent. You can withdraw your consent by writing to [counselling@mmu.ac.uk](mailto:counselling@mmu.ac.uk) or [wellbeing@mmu.ac.uk](mailto:wellbeing@mmu.ac.uk) stating your name, your student ID number and in the e-mail subject state: Withdrawal of Consent.



## Data retention

Your personal data will only be retained for as long as it is necessary in accordance with the University's Retention and Disposal Schedule. This is a publically available document and can be [viewed here](#). Specifically, we will retain your counselling, mental health and wellbeing personal data for a period of 6 years after our last contact with you, after which it will be deleted unless we are required to continue to retain this information due to ongoing legal proceedings.



## Your rights in respect of the processing

You GDPR provides data subjects with the following data subject rights:

- The right to be informed – this privacy notice assists with fulfilling these obligations.
- The right of access.
- The right to rectification.
- The right to erasure.
- The right to restrict processing
- The right to data portability
- The right to object

Please note, that these rights apply in certain circumstances, for example according to the lawful basis utilised by the University. The right of access to personal information held about you exists in order to be aware of, and verify, the lawfulness of the processing. To exercise these rights please write to: [dataprotection@mmu.ac.uk](mailto:dataprotection@mmu.ac.uk).



## Contacting us

For questions or concerns about this Privacy Notice or how we store and use your personal information, please contact [counselling@mmu.ac.uk](mailto:counselling@mmu.ac.uk) in the first instance.

Our Data Protection Officer can also be contacted using [dataprotection@mmu.ac.uk](mailto:dataprotection@mmu.ac.uk), by calling 0161 247 3331 or in writing to: Data Protection Officer, Legal Services, All Saints Building, Manchester Metropolitan University, Manchester, M15 6BH.



## Right to lodge a complaint with the supervisory authority

You have the right to lodge a complaint with the Information Commissioner's Office (ICO) as the supervisory authority in respect of the processing of your personal data. We would encourage you to expend our internal complaints procedure through our initial contact and the University Data Protection Officer, prior to contacting

the ICO. If you wish to contact the ICO the following contact information can be used: [casework@ico.org.uk](mailto:casework@ico.org.uk) or telephone: 0303 123 1113. For any further contact information please see: <https://ico.org.uk/global/contact-us/>.

### **Updates to this privacy notice**

We may update this privacy notice from time to time in response to changing legal, technical or business developments. When we update our privacy notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable data protection laws.