**Storing and managing your personal data**

**Introduction**

The University of Manchester Disability Advisory and Support Service (DASS) stores your personal data (sometimes referred to as personal information) and details about your condition and/or disability for the purpose of assessing your requirements and to inform recommendations about the support and adjustments you require.

Personal information means any information which relates to or identifies you as an individual. In relation to the information held by DASS this includes medical information and details of your condition/disability.

This document explains:-

* Why DASS requires your personal information.
* How and where your information is stored.
* The rules regarding the disclosure of your personal information and the choices you have about what may be disclosed.

You should read this document in conjunction with the University of Manchester Registered Student Privacy Notice.

<http://www.regulations.manchester.ac.uk/data-collection-notice/>

**Why does DASS collect your personal information?**

DASS will only collect and store your information when we have a valid and legal reason to do so. We store your information:-

* Because DASS requires a record of your condition with the associated medical evidence.
* To enable DASS to make the best possible response to your condition; the evidence you provide is fundamental to the DASS assessment of your needs and the recommendations made about the adjustments and the support which you should receive.
* So that DASS can assist you should you wish to apply for the Disabled Students Allowance.
* So that DASS has a record of our involvement with (and about) you.

**Where is your personal information stored?**

The information you provide is stored on:-

* A DASS student record system and a shared file directory which are accessible only to DASS and Specialist Mental Health Mentoring staff. Disability Coordinators use a reporting tool to access support plans from this.
* The Outlook mail system, which is password protected.
* The University’s main student information system.

DASS maintains very few paper records as paper documents are digitised for storage, but if we do have a paper record it is stored in a locked cabinet within a locked room in DASS. All paper documents are shredded once no longer required.

**What type of information does DASS collect and when is it collected?**

DASS collects information from you at various points in your time at University.

You may have provided details of your disability/condition when completing your UCAS or other application form and this information is made available to, and stored by, DASS.

When you choose to register with DASS you will be asked to provide evidence of your condition – this might include a letter from your GP or a specialist doctor, or an educational psychologist.

If DASS supports you with your application for the Disabled Students Allowance we will also store the information you provide in support of your application. We may also receive a copy of your DSA assessment.

DASS also maintains records of all of our interventions and communications with (and about) you **including meetings, e-mails and phone calls.**

**Data protection law conditions for processing**

The rules regarding the handling of personal information are set out in the General Data Protection Regulation (GDOR) and Data Protection Act 2018 (DPA 2018).

In order to comply with these laws we are required to tell you about the legal basis or conditions for processing your personal information.

 From Article 6 of the GDPR we rely on:

6 (c) processing is necessary for **compliance with a legal obligation** to which the controller is subject

The legal basis or conditions for processing special category personal information (more sensitive personal information such as the details about your disability) are listed in Article 9 and from this we rely on:

For providing support services

9(2)(b): processing is necessary for **the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law** in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

And for monitoring purposes:

9(2)(g): processing is necessary for **reasons of substantial public interest**, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

These conditions are further defined in the UK by schedule 1 of DPA18:

**Consent to share your personal information**

When you choose to register with DASS we will ask you for consent to share the details of your disability with other relevant people. You may choose to restrict with whom these details are shared but you should be aware that this may limit the support which can be offered.

You have 3 disclosure options as described below. Please do ask for advice or clarification if you feel that would be helpful.

The options set out below are as listed on the disclosure form which you will be asked to complete.

You may choose to give permission for **full disclosure**:-

1. ‘I give full consent for The DASS to disclose information regarding my disability and additional support needs as appropriate.’

This option approves DASS sharing information about your condition, support and involvement with DASS with your School Disability Coordinator, and other relevant staff who have a legitimate need to see them.

This may include, but is not exclusive to Academic and Support staff involved in your programme. It may also include health and safety personnel, the Exams office, the Library, the Counselling Service, the Occupational Health Service, the Advice and Response Team and the Accommodation Office.

This may also include those involved in any Disability-related Appeal, Complaint or Mitigating Circumstances application you make or with those involved in Health and Conduct, Fitness to Study and Fitness to Practise. This will enable colleagues to make the adjustments you require and to provide the support the DASS recommends.

This option also allows us to contact your Funding Body (e.g. Student Finance England) about any application for Disabled Students’ Allowances, Equipment Suppliers, Non-Medical Helper agencies and workers who are supporting you, DSA travel suppliers and DSA Assessment Centres. It also allows us to share information with the Greater Manchester Universities Student Mental Health Service.

We will **NOT** disclose information to any current or future employer.

All of those with whom we share your information have a duty to comply with data protection laws and respect confidentiality and will not share your information beyond those who need to know so as to support your studies.

You may choose to agree to only **partial disclosure**:-

1. ‘I consent for DASS to disclose that I have a disability but I do not want the nature of my disability to be disclosed’.

DASS will notify your School, and may consult with those listed in 1 above, that you have a disability and will make recommendations about adjustments **but will not disclose information about your condition**.

You may choose to **decline consent to any disclosure** of your personal information:-

1. ‘I do not give permission for any information regarding your disability or additional support needs to be disclosed to anyone outside DASS.’

Under these circumstances no information will be shared with your School or indeed anybody else either at or external to the University unless we have significant concerns about your wellbeing In circumstances where there is concern about your safety or welfare or we become aware of a risk to the safety or welfare of someone else. However in this case it may be difficult or impossible for the University to support you with your needs.

**How long is my data held?**

DASS operates in accordance with the wider University of Manchester rules which apply to the storage of student data.

This means that we will destroy your DASS record 6 years after your relationship with the University has ended, typically graduation.

**Access to Records**

You are entitled to access the information we hold about you. If you want to see all of the records or exercise any of your rights under the data protection laws, you should submit a request to dataprotection@manchester.ac.uk

If you want to see a specific document or record then contact dass@manchster.ac.uk and you will be provided with access to the document when your identity is confirmed.

**Sharing Information with Parents and External Agencies**

DASS will not normally share any personal information with your parents/carers, next of kin without your consent.

Normally DASS will only speak with or share your personal information with parents/carers/next of kin when you have provided your written consent for us to do so.

However in exceptional circumstances, if we consider there to be a risk to your safety or to the safety of others, we may contact, without your consent, those listed above or external agencies so as to ensure your wellbeing or the wellbeing of others.

**Who can I contact?**

If you have any questions regarding the above you may contact your Disability Advisor for clarification.

If you have any wider questions about how the University manages or uses your personal data you may contact the University’s data protection officer by email: dataprotection@manchester.ac.uk

Alternatively you may write to The Information Governance Office, University of Manchester, Christie Building, Oxford Road, Manchester, M13 9PL.