

# University of Manchester Privacy Notice: Dedicated confidential phone line and email service

#### 1. Introduction

This notice relates to any information obtained and processed by the University in connection with the dedicated confidential phone line or emails sent to the listed email address

#### 2. What is personal data (also known as personal information)?

Personal information means any information which relates to or identifies you as an individual and includes opinions about you or information which may not explicitly identify you (e.g. where your name has been removed) but which nevertheless does identify you if it is combined with other information that is readily available.

# 3. How does this notice relate to other information about data protection?

This notice applies to anyone that chooses to use the dedicated confidential phone line or email service and share personal data with the University support staff operating the service. Further details of the processing undertaken by the University in relation to prospective students, students, staff, alumni and research participants are available <a href="https://example.com/html/>here">here</a>.

## 4. Who will process my personal information?

This notice explains how the University of Manchester will hold and process your personal information for the purposes set out.

#### 5. What personal information will you process?

The University will process the personal information you choose to provide when you make a call to the phone line or send an email to the listed address. This may include:

- 5.1. Personal contact details such as name, title, and home address, telephone numbers, and personal email addresses
- 5.2. Date of birth
- 5.3. Gender
- 5.4. Next of kin and emergency contact information
- 5.5. Relevant biographical information
- 5.6. Information about the reason for your call or email including confidential or sensitive personal details that you may provide and any support needs or onwards referrals that are made

### 6. What is the purpose of the processing under data protection law?



We will only use your personal information when the law allows us to do so by providing us with a legal basis or valid condition. Most commonly, we will use your personal information in the following circumstances:

- Where we have your consent
- Where we need to comply with a legal obligation
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests

We may also use your personal information in the following situations, which are likely to be rare:

- Where we need to protect your vital interests (or someone else's interests)
- Where it is needed in the public interest

# 7. Can you provide examples of processing?

- 7.1. To ensure that we can offer you appropriate support, including by referring you to the University's counselling service.
- 7.2. To maintain a record of your call if you use the dedicated phone line. The telephone number you call from will be recorded by Gamma, the contracted provider of our telephony services. This information will not be used by Gamma in to identify you or for any purpose beyond operating the service to the University.
- 7.3. To maintain a record of any first disclosures of sensitive information for evidential purposes.
- 7.4. To support any further University investigation of incidents relating to your call or email that may be required.
- 7.5. Conducting analysis of the nature of the calls made or emails received to ensure the support offered is appropriate. The information recorded and reported will be anonymised.
- 7.6. To enable us to contact you again if we need to. This will be discussed with you first unless we feel that you or another person is in danger.

### 8. What constitutes "Special Category Data"?

The University will also process some information about you that is considered more sensitive and this is referred to as 'special category' personal data in the General Data Protection Regulation and Data Protection Act 2018. When we process this type of information we are required to apply additional protections. Special category personal data is defined as racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, health or sex life and sexual orientation, genetic data and biometric



data which is processed to uniquely identify a person. In the UK this also includes any personal information relating to criminal convictions.

# 9. How will you process my Special Category personal information and criminal convictions data?

We will only process special category personal information or that which refers to criminal offences or convictions in certain situations in accordance with the law. For example, we can do so if we have your explicit consent and, where this is relevant we will discuss this with you.

We do not need your consent to process special category personal data when we are processing it for the following purposes as these satisfy another legal condition:

- · where we need to carry out our legal obligations
- where you have made the data public
- where it is necessary to protect your vital interests or those of another person and where you/they are physically or legally incapable of giving consent
- where processing is necessary for the establishment, exercise or defence of legal claims
- · where it is needed to assess your working capacity on health grounds

In particular, we will use your special category personal information in the following ways

9.1. Information about your physical health or mental health or disability status to ensure your health and safety and provide appropriate support.

### 10. Who will my personal information be shared with?

Your personal data will only be used within the University, except where there is a statutory requirement to share with regulatory bodies or a disclosure is required because you or another person is at risk or in danger.

#### 11. What are my rights in connection with my personal information?

Under certain circumstances, by law you have the right to:

- 11.1. Request access to your personal information (commonly known as a "data subject access request"). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it
- 11.2. Request correction of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected



- 11.3. Request erasure of your personal information. This enables you to ask us to delete or remove personal information where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing
- 11.4. Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground. You also have the right to object where we are processing your personal information for direct marketing purposes
- 11.5. Request the restriction of processing of your personal information. This enables you to ask us to suspend the processing of personal information about you, for example if you want us to establish its accuracy or the reason for processing it
- 11.6. Request the transfer of your personal information to another party

You will not have to pay a fee to access your personal information (or to exercise any of the other rights). However, we may charge a reasonable fee if your request for access is clearly unfounded or excessive. Alternatively, we may refuse to comply with the request in such circumstances.

We may need to request specific information from you to help us confirm your identity and ensure your right to access the information (or to exercise any of your other rights). This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

If you would like to exercise any of these rights, you should contact the University Data Protection Officer by email: <a href="mailto:dataprotection@manchester.ac.uk">dataprotection@manchester.ac.uk</a>. Alternatively you can write to The Information Governance Office, University of Manchester, Christie Building, Oxford Road, Manchester M13 9PL. Further information about your rights is available from the University's data protection web pages.

# 12. How long is my information kept?

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for. We will retain a basic record of general nature of the call or email for six months. Any "first disclosures" of sensitive information will be kept for 3 years.

## 13. Who can I contact if I have any queries?

If you have any questions about how your personal information is used by the University as a whole, or wish to exercise any of your rights, please consult the University's <u>data protection web pages</u>. If you need further assistance, please contact the University's Data Protection Officer (<u>dataprotection@manchester.ac.uk</u>)

### 14. How do I complain?



If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (https://ico.org.uk).

### 15. Are changes made to this notice?

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.

This Notice was last update: December 2019