

Privacy Notice for the Advice Centre

1. Introduction

- 1.1 This privacy notice explains what personal data we may hold about you when you use RSU's Advice Centre, how we collect it, how we use it, and who we may share information with. We are required to give you this information under data protection law. This privacy notice should be read in conjunction with our [corporate privacy notice](#).
- 1.2 The RSU Advice Centre is an independent, confidential service. To give you the best possible advice and support, our advisors need to collect personal data, and sometimes sensitive personal data, about you and your circumstances. This notice explains how we handle that data.

2. Who we are

- 2.1 Roehampton Students' Union (RSU) is the data controller for the information you provide when using the Advice Centre. We're a registered charity (No. 1139857) and a company limited by guarantee (No. 07323081).
- 2.2 RSU is registered as a controller with the Information Commissioner's Office (ICO), registration number ZA161670, and is committed to being transparent about how it collects and uses that data and to meeting its data protection obligations.
- 2.3 To contact us about your data email rsu@roehampton.ac.uk (mark your email 'Data Protection').

3. What this notice covers

- 3.1 This notice covers all personal data collected and processed by the RSU Advice Centre, including initial bookings, enquiries, ongoing casework, representation, and referrals. It applies whether you contact us by email, phone, online, or in person.

4. Where we get your personal information from

- 4.1 We get your personal data from a number of sources. The legal basis for processing depends on how and why we receive it.
- 4.2 When you give it to us directly
- 4.3 When you contact the Advice Centre, we'll ask for some basic information so we can verify your membership, allocate the right advisor, and prepare for your appointment. We also ask for equality and diversity information. This is optional and will not affect the service you receive.
- 4.4 When you engage the Advice Centre, you consent to us processing your data for the purposes described in this notice. When we meet, you choose how much detail to share about your circumstances. The more we understand, the better we can help, but you're in control of that conversation.
- 4.5 The legal basis is consent. Where you share special category data, such as information about your health, ethnicity, religion, or sexual orientation, the legal basis is explicit consent.

- 4.6 If at any point you withdraw your consent, we'll stop processing your data for casework purposes. We can still offer general information and signposting to other services, but we may not be able to continue ongoing casework on your behalf. Withdrawal of consent does not affect the lawfulness of any processing we carried out before you withdrew it.
- 4.7 When the University shares it with us
- 4.8 RSU has a Data Sharing Agreement with the University of Roehampton which allows us to hold certain information about students. This includes your name, student ID, institutional email, course, department, and year of study. The Advice Centre may use this information to verify your identity and understand your academic context. The legal basis is legitimate interests.
- 4.9 When someone contacts us about you or refers you to us
- 4.10 We may receive information about you before you've contacted the Advice Centre yourself. This can happen in a number of ways. For example:
- Another student may raise an issue that affects you, such as a cohort-wide academic concern or a group complaint that begins with one student and expands to include others
 - Other areas of RSU may refer you to us, through our complaints process, helpdesk, academic feedback, or a conversation with an RSU staff member
 - The University may refer you to us, for example where the Wellbeing team identifies a student who may benefit from our support, or where the University is conducting an investigation at the same time as we're supporting you
 - A parent, guardian, or family member may contact us with concerns about you
 - If you're involved in a disciplinary process under RSU's Complaints and Disciplinary Policy, we may offer you independent advice and support through the Advice Centre.
- 4.11 Where a parent, guardian, or family member contacts us with concerns about you, we will not disclose whether you have previously used the Advice Centre.
- 4.12 Where the University, police, safeguarding teams, or other professional agencies contact us, we will respond in accordance with the confidentiality framework set out in Section 7 of this notice.
- 4.13 Where we receive a referral or a concern is raised about you, we will usually contact you directly to let you know and offer you the choice to engage with the Advice Centre. However, there may be circumstances where doing so could present a risk to you or others, or could compromise an ongoing investigation. In those cases, we will use our professional judgement about how and when to make contact. You're never obliged to engage with the Advice Centre. It's always your choice. The legal basis is legitimate interests until you engage the Advice Centre, at which point it becomes consent as described above.
- 4.14 When someone shares information with us on your behalf
- 4.15 Where you've asked someone else to contact us on your behalf or share information with us, for example a parent, a legal representative, or another support service, we may receive information from them. We'll only accept this where you've given your consent.
- 4.16 In certain circumstances

4.17 In specific situations, we may process your data on a different lawful basis, for example to protect your life in an emergency or to comply with a court order. These situations are explained in the Confidentiality and Disclosures section below.

4.18 Where a referral does not lead to engagement

4.19 Where you are referred to the Advice Centre but choose not to engage, the referral information is deleted within 30 days.

5. What personal data we collect

5.1 We will only ever collect data that is necessary to provide the Advice Centre's services to you. We won't ask for information that isn't relevant to your case.

5.2 Data we collect when you first contact us:

- Your name and student ID
- Your email address and contact phone number
- Your programme, year of study, department, and study mode
- Your residency status
- A description of your query and the type of advice you need
- Whether you've previously contacted the Advice Centre
- How you heard about us.

5.3 Data we may collect during your case:

- Information about personal matters such as your finances, housing, immigration status, health, family circumstances, or other information relevant to the advice you need
- Correspondence relating to your case.

5.4 Equality and diversity data (optional):

- Gender
- Ethnicity

5.5 We collect this information for monitoring purposes only. It helps us understand whether our service is accessible to all students. It is entirely optional, will not affect the service you receive, and is anonymised before use in any reporting.

5.6 Special category and sensitive data

5.7 The Advice Centre treats all information you share with us as confidential, regardless of its legal classification. Some of the data we process is classified as special category data under UK GDPR. This includes health information, ethnicity, religion, and sexual orientation. Where we process special category data, we do so on the basis of your explicit consent. You may also share information that is sensitive in nature but not legally classified as special category, such as your financial circumstances, housing situation, or immigration status. We apply the same standard of confidentiality and security to all of your case information.

5.8 If you don't want to share your identifying information

5.9 You can still use the Advice Centre without providing identifying information. If you'd prefer not to share details that could identify you, we can set up an anonymous case file that

captures notes about the advice given without any details that could identify you. You can also choose for us to take no records at all.

- 5.10 However, we want to be transparent about what this means in practice. Without identifying information on file, we won't be able to provide follow-up advice because we'll have no record of your case to refer back to. We won't be able to contact you if we later identify an issue with the advice we gave. And we won't be able to provide confirmation that you used the Advice Centre, for example if you later need a letter confirming you sought advice on a particular matter. We'll explain all of this to you at the time so you can make an informed choice.

6. What we use your data for

- 6.1 We use your personal data for the purposes set out below. Not all of these will apply to you, it depends on the nature of your enquiry or case:
- Contacting you about your case or enquiry
 - Managing your case record within our secure systems
 - Providing you with advice, guidance, and support on academic processes, wellbeing, housing, finance, and other matters affecting your studies or day-to-day life at University
 - Explaining University policies and processes, and advising you on how to respond or engage with them
 - Reviewing draft forms, statements, or submissions on your behalf
 - Accompanying you to meetings for support
 - Contacting the University to seek clarification on processes and options available to you
 - Signposting or referring you to University services, local support providers, or other appropriate sources of help
 - Carrying out legal duties, including sharing information with others where required by law
 - Contacting you after your case to ask for feedback on our service
 - Producing anonymised, aggregated statistics for monitoring and service improvement, for example to understand whether the Advice Centre is accessible to all students, to identify trends in the issues students face, and to inform RSU's advocacy work with the University and other bodies. No individual can be identified from these statistics.

7. Confidentiality and disclosures

- 7.1 The Advice Centre is confidential. This is fundamental to what we do. We will not disclose your contact with the Advice Centre, or any information you share with us, unless we have your permission or there are exceptional reasons as set out below.
- 7.2 We understand that you come to us because you trust that what you tell us will stay between us and we take that trust seriously. Breaking confidentiality without your consent is always a last resort, not a first response and we will always try to work with you to get the support you need voluntarily.
- 7.3 There are six circumstances in which we may share your information:
- 7.4 With your consent (the normal pathway)

- 7.5 Most sharing happens because you've asked us to. Where you give us your written permission, we may share relevant information with:
- The University of Roehampton (for example, Wellbeing Services, academic departments, Student Services, or the Registrar)
 - External agencies such as housing organisations, legal services, or debt advice providers
 - Your parents, guardians, or family members
 - Your legal representative or another support service.
- 7.6 We will only share the information that is relevant and necessary. You can withdraw your consent to share at any time, and you can choose to give consent for some purposes but not others.
- 7.7 Internal RSU referral
- 7.8 Sometimes your enquiry may also involve another area of RSU, for example if you come to us about a financial hardship issue and our basic needs community pantry could also help. If this happens, we'll let you know and ask whether you're happy for us to put you in touch with that team. We won't share your case information internally without telling you first. If you'd rather we didn't, just let us know.
- 7.9 Serious welfare concerns
- 7.10 If during the course of advising you, we become aware that you may be at serious risk of harm, for example because of a deteriorating mental health condition, a safeguarding concern, or circumstances that suggest you need support beyond what RSU can provide, we may share relevant information with the University of Roehampton so that appropriate support can be put in place.
- 7.11 We recognise that cases like that of Natasha Abraham at the University of Bristol have shown the serious consequences of institutions failing to share welfare information when students are at risk. Data protection law is not a barrier to sharing information where there is a genuine and serious welfare concern. We will not allow a rigid interpretation of confidentiality to prevent you from getting the help you need.
- 7.12 In practice, this means:
- We will always try to discuss our concerns with you first and seek your consent to share.
 - If you consent, we will share with the University contact most appropriate to your situation. This would normally be Wellbeing Services, but depending on the nature of the concern it may also include your academic department, the University's Safeguarding Lead, Student Services, or a senior member of University staff.
 - If you are unwilling to consent and we reasonably believe that you are at serious risk, we may share information without your consent. We will only share the minimum necessary to enable appropriate support to be arranged.
- 7.13 Where we share without your consent, we will tell you what we have shared and with whom as soon as it is safe and appropriate to do so.
- 7.14 Safeguarding

- 7.15 If we become aware of a serious risk to a child, a vulnerable adult, or other students, we may share relevant information with:
- The University of Roehampton (Safeguarding Lead, Student Services, or Security)
 - Local authority safeguarding teams
 - The police.
- 7.16 We will share only the information necessary to address the risk.
- 7.17 Immediate life-threatening emergencies
- 7.18 If you are at immediate risk of serious harm or death, for example you are experiencing a medical emergency, or you have told us you intend to harm yourself or someone else imminently, we will contact emergency services and may also contact the University's Wellbeing Services and your next of kin. In a genuine emergency, keeping you safe comes before everything else.
- 7.19 Legal obligation
- 7.20 We may be required by law to disclose information in certain circumstances, including:
- In response to a court order
 - In connection with certain criminal matters where we are legally compelled to provide information
 - To comply with statutory reporting obligations.
- 7.21 Where we receive a legal request for disclosure, we will assess it carefully. If we are not legally compelled to disclose, we will not do so without your consent.

8. How we keep your data safe and who has access

- 8.1 Security measures
- 8.2 Your case information is stored on AdvicePro, our secure, UK-based case management system designed specifically for advice services. Where you contact us through our online booking form (hosted on Cognito Forms), the data is transferred to AdvicePro by the advice team. AdvicePro is password-protected, encrypted, hosted in UK data centres, with encrypted backups stored at a secondary UK location.
- 8.3 Any emails, handwritten notes, or other documents relating to your case will be uploaded to AdvicePro and the originals securely destroyed. Physical documents are stored in locked filing cabinets accessible only to advice staff while in use.
- 8.4 Our corporate privacy notice includes further detail on the security measures we apply to all personal data we process.
- 8.5 Who has access
- 8.6 Access to advice case records is strictly limited to trained advice staff. Case data is not accessible to other RSU employees, elected officers, or volunteers. Where information is shared with any of the parties described in Section 7, this is done in accordance with the confidentiality framework above and not by granting access to the case management system.

8.7 Organisations we share your data with

8.8 We may share some or all of your personal data with the following organisations:

- Cognito Forms: online booking form
- AdvicePro: our secure, UK-based case management system
- University of Roehampton: only in the circumstances described in Section 7, and only with consent or where an exception applies
- Emergency services: in life-threatening emergencies
- External agencies: only with your consent, as described in Section 7.

9. How long we keep your data

- 9.1 We retain your case records for 6 years following the closure of your case. This period reflects the standard limitation period for bringing legal claims and aligns with professional standards for advice services across the sector.
- 9.2 If your case involves an ongoing legal matter, complaint, or appeal at the point the 6-year period would expire, we will retain your data until that matter is resolved. The 6-year retention period then restarts from the date of resolution.
- 9.3 After the retention period has passed, your data is securely deleted from AdvicePro. Anonymised, aggregated statistical data (from which no individual can be identified) may be retained for longer for service monitoring and trend analysis.
- 9.4 Where you are referred to the Advice Centre but choose not to engage, the referral information is deleted within 30 days.

10. Your rights

- 10.1 Under data protection legislation you have the right to access, correct, or delete your data, object to how we use it, or withdraw your consent. For full details on your rights, please read our [corporate privacy notice](#).

11. Data complaints

- 11.1 We take data protection seriously and want to resolve any concerns quickly. If you have a complaint, contact us first: rsu@roehampton.ac.uk (mark 'Data Protection Complaint') or write to the Chief Executive at our registered address.
- 11.2 Under the DUA 2025, we're required to acknowledge your complaint within 30 days and to respond without undue delay.
- 11.3 If you're not satisfied with our response, or prefer not to contact us first, you can complain directly to the ICO at ico.org.uk/concerns, on 0303 123 1113, or by post to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, SK9 5AF.

12. Changes to this notice

- 12.1 We may update this notice from time to time to reflect changes in the law, our processing activities, or best practice. When we make significant changes, we'll update the version number. Previous versions are available on request from the Data Protection Lead.

13. Document information

Approved by	Management Committee
Approved date	13/09/2026
Review frequency	Annually
Version	1.0

14. Change log

Version		Changes
1.0	September 2026	Original notice.