



Supplementary Data Protection Statement - Health & Wellbeing Records

This supplementary statement explains how St Edmund's College ("we" and "our") handles and uses personal data relating specifically to health and wellbeing that we collect about students ("you" and "your"). This statement is designed to supplement, and should be read in conjunction with, the Data Protection Statement for Students, see www.st-edmunds.cam.ac.uk/data-protection. The Data Protection Statement for Students includes further details regarding your rights in relation to your personal data. This Data Protection Statement is reviewed regularly and updated where necessary to reflect changes to the College's processing activities, including where personal data is used for a new or materially different purpose.

In broad terms, we use your personal data to ensure that we are able to provide healthcare and wellbeing support services to students, including monitoring the quality of the care and support provided.

The controller for your personal information is St Edmund's College, Mount Pleasant, Cambridge CB3 0BN. The Data Protection Officer for the College is Intercollegiate Services Limited (ISL) (64 Bridge Street, Cambridge CB2 1UR; 01223 768745; dpo@isl.colleges.cam.ac.uk). ISL should be contacted if you have any concerns about how the College is managing your personal information, or if you require advice on how to exercise your rights as outlined in this statement.

The person within the College with overall responsibility for the protection of information is the Senior Information Risk Owner, who at the time of issue is the Bursar. The Bursar can be contacted at bursar@st-edmunds.cam.ac.uk. Day-to-day responsibility for monitoring compliance with relevant legislation and dealing with concerns relating to the College's data protection arrangements sits with the College Data Protection Lead, who at the time of issue is the Governance, Risk & Compliance Manager. The Governance, Risk & Compliance Manager is the primary contact for all data protection matters and can be contacted at grcm@st-edmunds.cam.ac.uk. This is also the address to use if you wish to exercise any of your data protection rights, including requesting copies of personal data the College holds about you, or making a complaint about how the College has managed your personal data.

The legal basis for processing your personal data is usually that it is necessary for the purposes of our legitimate interests, including supporting student health, wellbeing, safety and participation in College life. In some cases, we may rely on another legal basis, including where where processing is necessary for the performance of our student contract with you, compliance with a legal obligation (e.g. the legal requirement for healthcare professionals to maintain records about the health of individuals under their care and any support or care they receive), the protection of vital interests, or the performance of tasks carried out in the public interest. Health and wellbeing information will usually include special category data. Where we process special category data, we will also identify an appropriate condition under Article 9 UK GDPR, for example where processing is necessary for the provision of health or social care, for reasons of substantial public interest, to protect vital interests, for public health purposes, or where you have given explicit consent for a specific optional use..

Why we collect information about you

Healthcare professionals who provide you with care are required by law or applicable professional standards to maintain records about your health and any treatment, care or support you receive. These records help to provide you with the best possible healthcare or wellbeing support and help protect your safety.

Personal data is collected and held for the purposes of providing healthcare and wellbeing services to students. This includes monitoring the quality of care and support provided. In making these provisions, the Director of Student Wellbeing (qualified counselling psychologist), the Mental Health Practitioner, the Student Wellbeing Advisor(s) and the Student Wellbeing Administrator(s) (collectively “the Student Wellbeing Office”) may collect information about you that helps them to respond to your queries, to provide healthcare or wellbeing support and / or to help you to secure specialist services. This personal data may be in written form and/or digital form.

Details we collect about you

The records the Student Wellbeing Office may hold about you on behalf of the College include the following: your name, address, date of birth, emergency contact details, study courses, college year, and matriculation term and year. They may also contain special category data about your physical and mental health, disability, wellbeing, care or support needs, such as the outcomes of any nursing or wellbeing review and any contact you have had with the Director of Student Wellbeing, College Nurse, Mental Health Practitioner and Student Wellbeing Officer, such as appointments and consultations.

Notes, letters, reports, details about your treatment, support and care, results of investigations and/or tests and relevant information from other health professionals or support services are also held, as are emails relating to your care, support, wellbeing or physical and mental health.

How your information is kept safe and confidential

Physical and mental health information and records of consultations may be held electronically, in paper copy or a mixture of both. Paper records are stored securely, and electronic records are held securely in systems approved for this purpose. Where electronic data is held on behalf of the College by a third-party provider, appropriate contractual, data protection and security arrangements will be in place. Any provider used for these purposes is required by the College to demonstrate appropriate security measures for the nature and sensitivity of the information being processed.

Direct access to health and wellbeing records is restricted to authorised members of the Student Wellbeing Office who require access for their role. Access is controlled through secure authentication arrangements and is limited on a need-to-know basis. The College remains the controller for personal data held on its behalf, and any third-party supplier used to store or manage records must process personal data only in accordance with the College’s instructions and applicable data protection law.

The Student Wellbeing Office is committed to protecting your privacy and will only use information collected lawfully in accordance with the UK General Data Protection Regulation (UK GDPR) and related national legislation, including the Data Protection Act 2018 and, where relevant, amendments made by the Data (Use and Access) Act 2025 (‘data protection law’).

Physical and mental health records will not normally be shared with other parties without your prior consent. However, information may be shared without consent where this is necessary and lawful, for example where required by law, where there are serious concerns about your safeguarding, wellbeing or safety, where there is a serious risk to others, where disclosure is necessary to protect vital interests, or where disclosure is necessary for the provision of care, support or emergency assistance.

Physical and mental health information disclosed to the Student Wellbeing Office is treated as confidential to the wider student support network, rather than absolutely confidential; that is, a member of the Student Wellbeing Office may need to share student information with other members of the student support network, including students' individual Tutors. However, you will normally be informed if we need to do this and provided with reasons for sharing the information, unless this is not possible or appropriate, for example in an emergency or safeguarding situation; even within the wider student support network this would only be on a strictly need-to-know basis.

During your time in College, there may be occasions when it would be beneficial for certain health records to be shared with another healthcare provider. You can object to your personal information being shared with other healthcare providers, but you should be aware that this may, in some instances, affect your care, as important information about your health might not be available to healthcare staff in another relevant organisation. If this limits the treatment or support that you can receive, this will be explained to you at the time you object, where possible and appropriate.

Your records are used to facilitate the care and support you receive. Information held about you may also be used to help protect the health of the public and/or other students, for instance during an outbreak of a communicable disease such as, but not limited to, an outbreak of Norovirus, Scarlet Fever, COVID-19 or Meningitis. During such outbreaks, the Student Wellbeing Office may consult the University Advisory Group on Communicable Diseases and/or the UK Health Security Agency, the local health protection team, NHS bodies, local authorities or any other appropriate statutory body.

Sharing information in the interests of the College and the student

At the start of your time at St Edmund's College, your consent will be sought to share your photo ID and specific health information if you are diabetic, epileptic and/or carry an adrenaline auto injector. In the case of severe allergies and anaphylaxis, it is requested that students allow sharing of information with certain members of College staff (e.g., kitchen staff, porters, the Student Wellbeing Office) to enable prompt treatment in case of an emergency. This is so that during a First Aid emergency you can be identified easily. You have the right not to consent, but you need to be aware that this may affect the First Aid care you receive. In an emergency, the College may still share relevant information where this is necessary to protect your vital interests or the vital interests of another person.

Record retention

General health records are normally retained for one year after the completion of studies. Clinical information generated in consultation with the College Nurse is normally kept for a minimum of eight years, in line with the RCN recommendation for the retention of nursing records. General clinical notes generated in consultation with the Director of Wellbeing and the Mental Health Practitioner are normally retained for seven years after your final involvement with the service. Records may be retained for longer where this is necessary and lawful, for example in connection with a complaint, safeguarding matter, serious incident, insurance claim, legal claim, regulatory enquiry or other lawful purpose. Any extended retention will be kept under review and limited to what is necessary.

Access to your Information

You have the right to see or have a copy of the information about you held in the Student Wellbeing Office, with some exceptions. You do not need to give a reason to make a request. If you want to access your personal data, you can request this either verbally or in writing to any College staff member. Your request will be treated as a formal Subject Access Request and dealt with by the College's Data Protection Lead in accordance with relevant data protection legislation requirements. The College will respond without undue delay and normally within one month, subject to any lawful extension or pause permitted by law. Information will be disclosed securely and subject to any applicable exemptions, restrictions and third-party rights.

Further information about your data protection rights, including rights of access, rectification, erasure, restriction, objection and data portability, is set out in the Data Protection Statement for Students. Some rights are not automatic and may be subject to exemptions or restrictions under data protection law.

Change of details

It is important that you tell the Student Wellbeing Office if any of your details, such as your name or address, have changed so that your records can be kept as accurate and up to date as possible. You are also encouraged to advise the office of any changes in your health or wellbeing, where support may be needed.

Complaints

If you are concerned about how the College has handled your personal data, you may raise this with the College Data Protection Lead, the SIRO or the DPO using the contact details above. The College will consider data protection complaints fairly and proportionately, and will normally acknowledge receipt within 30 days.

You retain the right at all times to lodge a complaint about our management of your personal data with the Information Commission at <https://ico.org.uk/concerns>.