

**STUDENT PRIVACY POLICY  
2024/2025**

**STUDENT SUPPORT SERVICES  
APPENDIX TO STUDENT PRIVACY POLICY**

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## STUDENT PRIVACY POLICY 2024/2025

### STUDENT RESOURCE CENTRE PRIVACY STATEMENT

What data do we hold?

The Student Resource Centre has a number of specific functions within TUS. Our core business is the provision of supports to all students with specific emphasis on those students who may require additional supports.

We are committed to complying with our obligations under data protection laws.

This is a short but detailed guide to inform you of how your data will be processed by us, and how we use and disclose student data in the course of performing TUS functions and services. This is also an introduction and outline to how we process data and is intended to be complementary to TUS' Student Privacy Policy.

In the course of carrying out essential TUS functions and associated student services, the Student Resource Centre processes a lot of data relating to our students. Examples of this include

- Name, contact information (address, email address, telephone numbers) date of birth,
- PPS number, nationality and country of domicile, next of kin, photo.
- Information relating to your previous education, qualifications and training records.
- Information relating to your family e.g. Emergency contact.
- Sensitive personal data which is classed as special category data to include physical or mental health, racial or ethnic origin, financial, or other welfare data, health or conviction data necessary to the performing of our functions.

Who controls your data?

TUS is the data controller in relation to the student data you give us.

Do we share your data with anyone outside TUS?

The Student Resource Centre (SRC) is state funded and is required to provide returns to the HEA in order to support and ensure ongoing funding. On this basis certain sections of the SRC provide the HEA with statistics from some of our functions. The Counselling service does **not** normally provide information or statistics to the HEA. If requested to do so in the future, the statistics will be anonymous and no individual person or case will be identifiable.

See each function statement for other data sharing instances. See the HEA privacy notice [here](#).

Who are we?

Meet our Student Services Teams [here](#).

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### Counselling Service

TUS Student Counselling Service offers a professional psychological counselling service to all students of TUS. Counselling is provided by a team of professionally qualified counsellors/psychotherapists.

The service is confidential and operates within the terms of confidentiality as laid down by the Counsellors Professional Registration bodies (IACP, PSI, IAHIP). We are also committed to complying with our obligations under data protection laws. This means that your personal details are not disclosed to anyone outside the service without your expressed permission, except in exceptional circumstances described in this document.

The purpose of this privacy notice is to outline how TUS SCS collects, uses and shares your personal data and your rights in relation to the personal data we hold on you.

#### What information do we collect?

We collect personal information from you when you register to use the counselling service, and during your attendance at counselling. Registration information includes name, telephone and email contact details, and other relevant personal information that the service needs to process your registration. When you attend for counselling sessions brief notes of the sessions are also kept in line with good practice guidelines.

Your records and counselling notes are held on a secure, GDPR compliant record management system. Your record will include (in addition to the personal details above) other relevant information such as referral details, letters, assessments, emails and notes of other contacts relevant to you e.g. emergency contact. This system is encrypted, and has strict security measures, meaning nobody outside of the Student Counselling Service can access these details. Your identity and counselling records/notes are not shared with anyone unless we are legally required to do so. Counselling Service files are not attached to any academic record within the university.

One of the terms of using this service is that you give us an active telephone number and student email address. We also require that you give us details for an \*emergency contact person. This is to ensure that we can provide an efficient and safe service for you.

*\*Please let your emergency contact know that you have given us their name and number.*

Our basis for collecting this information is referred in Regulation (EU) 2016/679 GDPR: Article 6 (1)(d) *Processing is necessary in order to protect the vital interests of the data subject or another individual.* Also \*Article 9 Paragraph (9) *Processing of special categories of personal data.*

Our basis for collecting this information is referred in Regulation (EU) 2016/679 GDPR: Article 6 (1)(d) *Processing is necessary in order to protect the vital interests of the data subject or another individual.* Also \*Article 9 Paragraph (9) *Processing of special categories of personal data .*

#### Where do we get your personal data from?

We obtain personal data about you from the following sources:

- From you when you register with us and use the service.
- From other university departments, e.g. Health Centre nurse or doctor, chaplaincy, Faculty, as a referral
- From services or individuals outside of TUS, as a referral to the service

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Why do we collect your data?

We collect your data in order to:

- Verify your identity
- Provide you with the service you have requested
- Create your client file and book your appointment(s)
- Send appointment reminders, or updates regarding appointments
- Send updates regarding programmes/services that are relevant to student mental health and wellbeing
- Contact you in the case of a data breach

Do we share your data?

Access to client records is regulated to ensure that they are used only to the extent necessary to enable our staff to perform their tasks for the proper functioning of the service. In this regard, clients should understand that the service administrator may have access to their name and contact details for the scheduling and prioritising of appointments.

On some occasions it may be necessary to request that you give permission for us to communicate relevant information, about you, to other health and social care professionals in order to provide you with the treatment and services you need e.g. GP Referrals/Consultants. These other professionals are also legally and ethically bound to treat your information with the same duty of care and confidentiality as we do. You are entitled to refuse consent to information sharing, but should be aware of the implications of your choice in terms of accessing services within TUS, external services and for your treatment progress.

There are instances when we may have to share information about you without seeking your prior consent:

- If there is a serious demonstrable risk to health or life (yours or others);
- Where child protection issues arise we are legally mandated to report to TUSLA.
- Where notes/records are subpoenaed by a court.

Students can request their own data from the service. Where a third party requests this information, our protocol is to provide the data directly to the student.

Supervision

All of our counsellors are required to engage in regular professional supervision as part of their professional development and to maintain their accreditation with relevant bodies (e.g. IACP, PSI, IAHIP). During supervision they reflect upon their work with their clients with an experienced and appropriately qualified supervisor. Client confidentiality practices are strictly adhered to and no identifying information is revealed.

Annual reports/research/evaluation

Student Counselling Service compiles an annual report which contains anonymised data relating to client demographics and student presenting issues. These overall statistics are available within TUS. They also form part of aggregate annual statistics generated by PCHEI (Psychological Counsellors in Higher Education Ireland) third level institutions across the country. TUS SCS also collects

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anonymous evaluation data from students using electronic evaluation forms. This evaluation cannot identify the student responding. Students also give informed consent to opt in to specific research projects.

All data collected is used anonymously for research, reporting and statistical purposes.

How long do we keep your personal data?

Once you finish with the counselling service, all data regarding your counselling is stored securely for 7 years and then destroyed confidentially.

Is the data held securely?

Your personal data is held electronically on an encrypted record management system. Access to this system is by individual, password protected login, we use a two-factor authentication process which ensures a high level of security. Access is limited to relevant counselling service staff.

Your rights in relation to your data

You have the following rights in relation to personal data held on you:

- the right to be informed about the collection and use of their personal data
- the right to access and receive a copy of their personal data, and other supplementary information
- the right for individuals to have inaccurate personal data rectified, or completed if it is incomplete.
- The right for individuals to have personal data erased in certain circumstances
- The right to request the restriction or suppression of their personal data in certain circumstances
- The right to data portability allows individuals to obtain and reuse their personal data for their own purposes across different services
- the right to object to the processing of their personal data in certain circumstances.
- The right to not be subject to solely automated decision;

For further information on your individual rights [Technological University of the Shannon \(tus.ie\)](https://www.tus.ie)

### **Disability Support Service**

What information do we collect?

The Disability support service collect personal data such as Name, Date of Birth, Student ID Number, Contact details, Gender, Next of kin, and other relevant information including medical information.

Why do we collect your data?

In general terms, we process your personal data for the administration of your position as a student at TUS and in order to ensure access to disability related academic support and reasonable adjustments.

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Where does Disability Services get your personal data from?

We obtain personal data about you from the following sources:

From you, and TUS student registration system, when you register with us.

From you, when you contact us via email, phone or post, or when you provide us with details at Information Days or Open Days;

From the information you provide if you register with us via the online student portal.

From medical or health and social care professionals, or those providing you with evidence of your disability, when you have given permission for them to contact us;

From other Services and academic Faculty within TUS, if you declare a disability and ask for your information to be shared with us;

From Assessment Centres regarding your Study Needs Assessment, when you have given permission for this information to be shared;

From third party sources such as parents/guardians; medical professionals, and previous schools/colleges. When we obtain personal data about you from third party sources, we will look to ensure that the third party has lawful authority to provide us with your personal data.

What do we do with your data?

The Disability support service stores your data on our Information management system. This system is designed for the processing of special category data. Only authorised users have access to this system. We have a data processing agreement in place with this company in order to protect your data.

We also keep a hard copy of your details in a secure locked filing cabinet in the Disability Office.

Categories of personal data being processed

We will collect and process personal data about you for the purposes described below. Personal data may contain “special categories of data” as described under the GDPR. Such “special categories of data” will include information about your physical or mental health and/or disability. When you register with Disability Support Services, you can decide if you wish to share with Disability Support Services, and/or the wider TU certain types of “special categories of data”. You should be aware that not sharing required data may prevent the disability support service from providing adequate support.

Who might we share your data with?

TUS Disability Support Services will occasionally share your personal data with third parties. For example, it may share some data with internal third parties involved in the delivery or funding of your disability-related support, such as Academic Department and the Examinations office. This is shared using a secure shared drive accessible only by relevant TUS staff. The information shared is limited to that which is necessary to carry out the function.

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To professional bodies where registration with that body is related to or a requirement of the student's studies. Article 9(1)(g)  
For the assessment and provision of services to disabled students. Article 9(1)(a)  
For admission to and the administration of student programmes. Article 9(1)(a)  
Where required, to the police or other agencies in connection with particular programmes of study or prior to certain placements. Article 9(1)(a) or (g)  
To the Higher Education Authority, government departments and other authorised users for the analysis of student statistics and/or to enable them to carry out their statutory functions as applicable. Article 9(1)(a). Statistical information is anonymous.  
We also share data for some of our students (those who receive supports through the Fund for Students with Disabilities (FSD) with the funding providers the HEA, and the ESF. This is a requirement of the fund itself.  
We will need your specific consent to share details with external support providers in the case of students who require a PA/notetaker and/or transport.

How long do we keep your information?

Medical information and notes are retained for 7 years and then destroyed confidentially. Where possible, this information can be returned to you instead of being destroyed. Information relating to the Fund for Students with Disabilities (FSD) applications is retained for a period of 16 years from the start of a European Social Fund period.  
Information databases for sharing data internally to Academic Department or Examinations office are deleted after one academic year.

Is the data held securely?

We encourage students to provide all personal data electronically. However, if students choose to provide hard copies, these will be kept in a secure locked filing cabinet in the Disability Office.

### **Health Centre**

TUS: Midlands, Midwest Student Health Centres and Student Sexual Health Service want to ensure the highest standard of medical care for our patients. We understand that our service is a trusted entity governed by an ethic of privacy and confidentiality. Our approach is consistent with the Medical Council guidelines and the privacy principles of the Data Protection Acts. TUS is the Data Controller and we retain your information securely and in line with the TUS Data Protection Policies and Procedures and the TUS IT Security Policies and Procedures: [Data Privacy and Freedom of Information - TUS](#).

This statement is to advise you of our practices on dealing with your medical information.

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### Managing Your Information

In order to care for you, we need to collect and process personal data and data concerning health. We need to keep information about you and your health on our records as part of your medical file.

We will only ask for and keep information that is necessary.

We retain your information securely on an encrypted computerised patient case management system. Access to this system is by individual, password protected login. Access is limited to relevant student health/sexual health service staff. We will attempt to keep it as accurate and up to date as possible. We will explain the need for any information we ask for, if you are not sure why it is needed.

We ask that you inform us about any relevant changes that we should know about. This would include such things as any new treatments or investigations being carried out that we are not aware of. Please also inform us of change of address and phone numbers.

All persons in the practice (not already covered by a professional confidentiality code) are directed to adhere to a confidentiality awareness directive that explicitly makes clear their responsibilities in relation to personal health information and the consequences of breaching that duty.

### What Information do we collect?

We collect personal information from you when you register as a patient with the service. We ask you for your surname, forename, date of birth, gender (if you wish to specify) address of student accommodation, home address, phone number or email address, next of kin details, own GP details and your college course. If you hold a medical card/ European Health card we ask for these details. We also ask for a valid PPS Number as this is used in certain healthcare schemes to provide you with free services. We also collect and process data concerning your health. TUS Midwest ask all patients to verbally agree to be contacted via text message & email in order to be able to follow up on your treatment. TUS Midlands ask all patients to give written consent to contact them by telephone, email or SMS text message about appointments, billing, prescriptions and investigations. We advise patients that they can contact us at any time to withdraw consent.

### Why do we collect your data?

In order to care for you we need to collect and process personal data and data concerning health. It is not possible to undertake medical care without collecting and processing personal data and data concerning health.

### Do we share your data?

Access to patient records is regulated to ensure that they are used only to the extent necessary to enable our staff to perform their tasks for the proper



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functioning of the practice. In this regard, patients should understand that the health service administrator may have access to their records for:

- Viewing and converting Microsoft Forms submitted online in order to register patient appointment requests, update and integrate patient details.
- Preparing referral letters to hospital consultants or allied health professionals such as physiotherapists, occupational therapists, psychologists and dieticians.
- Scanning clinical letters, radiology reports and any other documents not available in electronic format.
- Downloading laboratory results and performing integration of these results into the electronic patient record.
- Photocopying or printing documents for referral to consultant; attendance at an outpatient clinic or when a patient is changing GP.
- Checking if a hospital or consultant letter is back or if a laboratory or radiology result is back, in order to schedule a conversation with nurse/doctor.
- Checking for a patient if results are back in order to schedule a conversation with the relevant healthcare practitioner
- Handling, printing, photocopying and postage of documents.
- Viewing and converting patient emails in order to register the request in the electronic patient records
- And other activities related to the support of medical care appropriate for practice support staff
- TUS Midwest Health centre has a data processing agreement in place with the company Socrates to protect your data.
- All services have a data processing agreement in place with the company Clanwilliam to protect your data.

### *Service Administrator Access*

Students attending the TUS Midlands sexual health, contraception and health promotion service should understand that the service administrator may have access to their records for:

- Viewing and converting Microsoft Forms submitted online in order to register patient appointment requests, update and integrate patient details.
- Handling, printing, photocopying and postage of documents and other activities related to the support of medical care appropriate for practice support staff.

Do we share your data with Third parties?

We may need to pass some of your information to other health and social care professionals in order to provide you with the treatment and services you need e.g. Referrals to Consultants; hospital laboratories, pharmacies, TUS counselling service. Only the relevant part of your record will be released. These other professionals are also legally bound to treat your information with the same duty of care and confidence as we do.

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The law provides that in certain instances personal information (including health information) can be disclosed, for example, in the case of infectious diseases.

Disclosure of information to Employers, Insurance Companies and Solicitors. In general, work/college related Medical Certificates from the student health centres/sexual health service GP will only provide a confirmation that you are unfit for work/college with an indication of when you will be fit to resume work. Where it is considered necessary to provide additional information we will discuss that with you. However, Department of Social Protection sickness certs for work must include the medical reason you are unfit to work.

In the case of disclosures to insurance companies or requests made by solicitors for your records we will only release the information when you submit an access request, accompanied by proof of I.D. to the TUS DPO at [datacompliance@tus.ie](mailto:datacompliance@tus.ie). Your records will not be viewed by the DPO and will be shared directly from the service. There is no cost for this and the data will be provided to you within 30 days of receipt of a valid application.

TUS Health Centre's as well as the student sexual health, contraception and health promotion service works to provide the best healthcare options for you. This sometimes requires applying for grant funding for specific projects. In this instance anonymous statistical data is shared with grant agencies and government bodies, where appropriate.

In order to send a fee request for services to a patient in TUS Midlands, Billink Payments processes your personal data (name, phone number and fee details). Billink Payments are required under data protection law to ensure there is an appropriate basis for the processing of your personal data. TUS Midwest use a "SumUp" machine to process payments.

The student sexual health, is a fully funded service, therefore, unlike, the student health service, we do not share your personal data or information with Billink Payments in order to send fee requests to patients.

It is usual for the service to provide regular service reports with funders, stakeholders and University authorities. Information used for such purposes is done in an anonymised manner with all personal identifying information removed.

Use of Information for Training, Teaching & Quality Assurance,  
Research & Audit.

It is usual for student health care/sexual health care teams to discuss patient case histories as part of their continuing professional education or in order to provide training. In these situations the identity of the patient concerned will not be revealed.

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It is usual for patient information to be used for research & audit in order to improve services and standards of practice. Information used for such purposes is done in an anonymised manner with all personal identifying information removed.

### Your right of Access to Your Health Information

You have the right of access to all the personal information held about you by the student health centre and the sexual health service. If you wish to see your records, in most cases the quickest way is to discuss this with your nurse/doctor who will review the information in the record with you. You can make a formal written request by submitting an access request, accompanied by proof of I.D., to TUS DPO at [datacompliance@tus.ie](mailto:datacompliance@tus.ie). Your records will not be viewed by the DPO and will be shared directly with you by the Health Centre or sexual health service.

There is no cost for this and the data will be provided to you within 30 days of receipt of a valid application.

### Transferring a copy of your records to another practice

We can facilitate requests for a copy of your record to be transferred to another practice upon receipt of your signed consent from your own /new doctor. For medico-legal reasons we will also retain a copy of your records in the student health centre for an appropriate period of time which may exceed 8 years.

### Other rights

You have other rights under the data protection regulations in relation to transfer of data to a third country, the right to rectification or erasure, restriction of processing, objection to processing and data portability. Further information on these rights in the context of general practice is described in the Guideline available at <http://www.icgp.ie/data> you also have the right to lodge a complaint with the Data Protection Commissioner.

## **Careers Office**

### What information do we collect?

The Careers Office collect personal data such as Name, Date of Birth, Student ID Number, contact details, education, and other relevant information that would be included on a C.V. One way this information is collected is via an appointment scheduling system called Target Connect.

The Careers office use an online strengths profiling platform - [strengthsprofile.com](http://strengthsprofile.com). This uses a series of questions to profile qualities which are specific to the individual. Access to this facility may be provided to specific programmes within TUS. If you choose to use the facility provided then the profile results are sent to the Careers officer so that they can discuss your future options and career development.

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We use an online platform called Target Connect. Student name and contact data is refreshed to Target Connect on a daily basis from the TUS student record system, ensuring that only students who are registered can make a request via this platform. When you log in to this system you can see your own profile, book an appointment with the Careers office staff, access webcasts and videos which may be of assistance if you are looking for employment. There is also an option for you to make application for jobs where vacancies are listed.

The careers office staff are the sole administrators on this system and helpdesk queries are generally addressed by using screenshots which do not contain personal data.

Should you decide to use the job application facility on Target Connect, you will be re-directed to the company website, or email address. TUS will not have any access to these applications.

### Why do we collect your data?

In general terms, we process your personal data for the administration of your position as a student at TUS and in order to assist with access to employment and further education related support.

Where does the Careers Office get your personal data from?

The Careers office collect personal information about you through:

- Information you submit in person
- C.V.'s you send in via email
- Student registration system once you register with us

The information you provide us will normally include, name, address, contact number, email address and other relevant information

### What do we use our data for?

This information is used by us to:

- Provide careers advice services to you,
- Enable you to submit your CV generally, and to apply for specific jobs;
- Provide information on suitable job categories to you
- Answer your enquiry
- 

### Do we share your personal data?

The Careers office may share your personal data, on written instruction from you, with potential employers.

### How long do we keep your information?

The information is retained for the duration of your Programme, or longer, if you request us to do so.

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Is the data held securely?

Yes. Your information is held, electronically, on a folder accessible only by the Careers staff, on a password protected server.

### **Tutoring Service**

What information do we collect?

The information we collect will normally include, name, Student I.D., telephone number, email address and other relevant information. We also request \*access to your results, via your academic department, to provide more specific assistance to you.

\*The tutor will only have access to your results where you have given written consent for them to do so. This consent can be withdrawn at any time.

Where does the Tutor get your personal data from?

The Tutors collect personal information about you through:

- TUS Student registration system
- Information you submit in person
- Your Academic Department (with your consent)

What do we use our data for?

This information is used by us to:

- Advise you of the existence of the tutoring service
- Provide tutoring service
- Book appointments on our Yellow Schedule appointments system
- Provide assistance tailored to your requirements
- 

Do we share your personal data?

Your data will only ever be shared with your permission e.g. if you are seeking referral to additional services

How long do we keep your information?

The information we collect will be held for the duration of your programme.

Is the data held securely?

Yes. Your information is held, electronically, on a folder accessible only by the Tutor, on a password protected server

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### **Pastoral Care Service**

What information do we collect?

The information we collect will normally include, name, telephone number, email address and other relevant information.

Where do we get your personal data from?

The Chaplaincy office collects personal information about you through:

- Conversations with you directly
- Concerns about your welfare raised by one of the TU staff. This will generally, but not always, be with your knowledge
- The information you provide which can include, name, address, telephone number and other relevant information, including emergency contact details.

How secure is the personal data?

Discussions with individual students generally take place in the safe and confidential environment of the Pastoral Care Service office. Confidentiality is always observed except in cases where a person or persons are at risk. A single meeting or a series of meetings may be offered depending on the situation where a listening ear is offered. Referrals are carried out if this is deemed necessary. In the case of necessary intervention, the Pastoral Care team work closely with the Counselling Service, and/or with family members in the vital interests of your welfare.

How long do we keep your information?

The Pastoral Care Service does not generally produce or retain high volumes of personal data. The personal data we hold is retained until the student has completed his/her programme or six months after last contact. In TUS Midwest, we have a Register of Data Retention in compliance with the Company's Act and the AG Audit Requirements that we retain our info for 7 years in a locked Archive.

### **Access and Mature Services Office**

The Access Office supports students from lower socio-economic and disadvantaged groups such as mature students, people with disabilities, migrants and Travellers/Roma in coming to third level.

The office also processes and manages payments for the Student Assistance Fund and the 1916 Bursary and Kickstart Scholarships in conjunction with DCU; Maynooth; and DkIT. These are online application processes.

A Leaving Cert pass maths programme is also managed by this office.

What information do we collect?

The information provided to us will normally include, name, address, student number, email address, Date of Birth, Telephone number; previous education;

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family circumstances, and other relevant information including medical and financial.

Where do we get your personal data from?

We collect personal information about you through:

- Information you submit in person
- Student registration system once you register with us

What do we use our data for?

This information is used by us to:

- Enable you to make application and register on the TUS Access programme
- Assist with your studies
- Assist to alleviate financial difficulties during your time in TUS

Do we share your personal data?

In order to assist you with your programme, the Access Office may share your data with relevant departments within TUS including, Faculty; Registry and other functions within the Student Services department.

The Access Office also shares pseudonymised data with the HEA and the EU.

How long do we keep your information?

Information relating to the Student Assistance Fund must be retained in line with standard record retention requirements. All other data is retained for a period of 7 years.

How is the data stored?

The data is stored securely as a hardcopy in locked cabinets, locked Archive Room and in password protected electronic format.

If you have any questions in relation to how we process your personal data or are unhappy with how your personal data has been processed you can contact [dataprotection@tus.ie](mailto:dataprotection@tus.ie).