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**Data Protection Policy**

**1.0 Introduction**

* 1. This policy provides a framework for ensuring that Harper Adams Students’ Union (HASU) meets its obligations under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18).
	2. HASU complies with data protection legislation guided by the six data protection principles. In summary, they require that personal data is:
		1. Processed fairly, lawfully and in a transparent manner.
		2. Used only for limited, specified stated purposes and not used or disclosed in any way incompatible with those purposes.
		3. Adequate, relevant, and limited to what is necessary.
		4. Accurate and, where necessary, up to date.
		5. Not kept for longer than necessary; and
		6. Kept safe and secure.
	3. In addition, our staff have access to a number of policies and procedures to give them direction to the application of data protection legislation. These include the Record Retention Schedule and Layered Notice.
1. **Information covered by this policy.**
	1. The UK GDPR definition of "personal data" includes any information relating to an identified or identifiable natural living person.
	2. HASU only processes student data related to our aims and objectives in order to provide an effective and functioning Students’ Union for its member’s benefit. The data that we collect is generally your name, student number, course and contact details along with events that you attend and clubs or societies that you belong to. We may also collect personal sensitive data to aid us in reporting and understanding the types of students engaged in our activities.
	3. For Health & Safety and Insurance purposes we will also record any incidents of harm or injury that occur during events organised by HASU. These records will be kept for an extended period, generally up to 3 years, in accordance with our Record Retention Schedule for these purposes.
	4. HASU are registered with the Information Commissioners Office as a Data Controller for the processing of personal data. Our [registration number is ZA093834](https://ico.org.uk/ESDWebPages/Entry/ZA093834).
	5. HASU do not transfer any Student Data outside the UK.
	6. If you have any concerns about how your data is processed by HASU, then please contact the HASU Director.
2. **What data we collect and how we use it.**
	1. Harper Adams University regularly provides HASU with an up-to-date list of current students along with other personal data, such as your University email address, course and year of study. A date of birth is only provided for all students under the age of 18 years at enrolment, for licencing purposes. In addition, HASU provides information to the University concerning, club and society membership, the storage of firearms, information such as attendance lists to allow the investigation of poor behaviour in our groups or venues or breaches of student disciplinary policy or concerns about the mental health of any student.
	2. HASU and Harper Adams University have a Data Sharing Agreement in place in order to facilitate this sharing of data between the two parties.
	3. HASU provides a platform for students to provide further personal data as part of an online profile.
	4. All students automatically become a member of HASU. If you do not wish to be a member of the HASU, then you opt out at enrolment. By “Opting Out” you acknowledge that you will not be able to access certain HASU services such as being able to vote and stand in the Executive Officer elections.
	5. We may share your personal information with third parties where required by law, where it is necessary to administer the working relationship with you or where we have another legitimate interest in doing so.
	6. We may receive some of your personal data from third parties, with whom you have shared your data and agreed to allow them to share it with us. For example, we may share and receive your data with our ticketing partners or platforms.
	7. HASU has a layered notice (Appendix 1) that provides details of all agencies or partners with whom we share your data.
	8. HASU also process the data of staff that work for the Students’ Union. This allows us to comply with statutory requirements, such as income tax, and also to administer the work and employment record of all of our employees.
	9. Our privacy notice can be found in appendix 3.
	10. Students who opt out of membership at any stage will have their details removed from the data feed HASU receives from the university within 30 days. Some data may be retained or pseudonymised in line with our record retention schedule (Appendix 2)
	11. Any data we collect from students who have opted out will be limited to data that they share with us via consent, contract or where there is legitimate interest for HASU to do so in order to facilitate core charitable activities as defined in our constitution available via harpersu.com These activities may include but are not limited to where a student purchases products or event tickets from us or any student voice feedback or complaints.
3. **Lawfulness of Processing**
	1. In accordance with Article 6 of the UK GDPR, all data processed by HASU must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests.
	2. Generally, HASU rely on Legitimate Interests or Consent as a lawful basis to process student data. Further information on specific lawful bases is available in the HASU Record Retention Schedule (Appendix 2).
	3. HASU are required to retain some student data for up to 3 years after a student has left the University, to allow for any legal claims. This is stored on the MSL platform. Following this period, a student’s data is either deleted or pseudonymised before being securely deleted a further 3 years later.
	4. Pseudonymisation is defined as the removal of the following attributes present in the MSL database – all name data, date of birth, all addresses and residence data, all contact data, all course data with the exceptions listed below.
	5. The following data is retained on each individuals record where pseudonymisation has taken place – student ID, gender, nationality, country of birth, mode of study (PT/FT), year of student, campus, student status, other academic course data, which is non identifying to the individual person, ethnicity (if stored), religious belief (if stored).
	6. HASU only collect and process a minimum amount of Personal Data from each student, dependent on the purpose. (See 3.1 above) HASU may also receive the Personal Data of some students via third parties, such as the security officers at the SU bar or the first aid providers for sports events.
	7. HASU strives to ensure that the data that it collects is accurate and up to date. Some of the data collected is supplied by the University and is updated several times each academic year. Some data is supplied directly by students themselves, such as bank details and firearms data. We encourage any student who believes that we are holding data concerning them, that is not accurate, to contact us at studentsunion@harper-adams.ac.uk and to provide up to date details as soon as possible.
4. **Data Security**
	1. HASU has taken steps to ensure that the appropriate technical and organisational measures are in place in order to protect the security of the data processed. Many of these security measures are shared by Harper Adams University when we share their network.
5. **Data Subjects Rights**
	1. Under the UK GDPR all Data Subjects have rights in relation to the accuracy and access of their data. Anyone who would like to make a Subject Access Request can ask for a copy of their data. The Information Commissioner has a [template for making such requests](https://ico.org.uk/for-organisations/sme-web-hub/subject-access-request-template-for-small-businesses/) Once submitted, if it is held, then HASU have a month to provide you with the data requested.
	2. We strive to ensure that your data is kept up to date and is accurate. However, if you should become aware of any of your data is incorrect or if you have changed any of the details that we hold about you, such as your email address, please contact the HASU office or email studentsunion@harper-adams.ac.uk
6. **Data loss or security breach**
	1. HASU takes the security of all the data that we hold, very seriously. Anyone who becomes aware of any data loss or security breach must report it to either the HASU Director or to the University Service Desk immediately. We are required to notify the ICO of any incident without undue delay and not later than 72 hours of becoming aware of it. Any delay in reporting a data breach may exacerbate the incident and so it is important that it is reported as soon as possible.
7. **CCTV**
	1. There is CCTV in use throughout the University, operated by the University. As HASU operates within the buildings and grounds of the University, then the areas used by SU members are also covered by the CCTV.
	2. In particular, there is CCTV both within the gym, the HASU bar and the surrounding area. This CCTV helps to ensure the safety and wellbeing of all people who use these facilities.
	3. Under our existing Data Sharing Agreement with the University, HASU has access to the CCTV live feed, covering these areas. This allows up to react and for our security to deal with any incidents that occur in these areas in real time, as well as using the recordings for follow up investigations.
8. **Cookies**
	1. Harper Adams Students’ Union uses cookies on our websites. Cookies are small text files that store information on your computer or smart device when you access certain websites. Cookies allow us to recognise your device when you visit our sites and they enable us to store certain information about your preferences, for example your local store. Cookies make it easier for you to maintain your preferences and help us customise the Sites to suit your preferences.
	2. More Information about how we use cookies can be found here [Cookies Policy (harpersu.com)](https://www.harpersu.com/yoursu/yourdata/cookies/)
9. **Staff Responsibilities**
	1. All HASU staff have a responsibility for ensuring that all data is collected, stored and handled appropriately, in line with this policy and the other HASU policies relating to data protection legislation.
	2. HASU staff should only access personal data held by the Students’ Union for legitimate and lawful work-related purposes. The data must only be used for the specified and lawful purpose for which it was obtained and processed, in accordance with the privacy notice, provided to the data subject.
	3. Personal Data held by HASU must be treated as confidential and must not be shared or discussed informally with any other person. Staff should not make unnecessary copies of any printed documents containing personal data and when work is completed, these documents must by stored securely or disposed of in the confidential waste bins. If confidential waste bins require emptying, a request should be made to the Porters office.
	4. On induction, staff must complete data protection training with a central record of training being held.
	5. HASU takes the security of all the data that we hold, very seriously. Anyone who becomes aware of any data loss or security breach must report it to either the HASU Director or to the University Service Desk immediately. You are required to notify the ICO of any incident without undue delay and not later than 72 hours of becoming aware of it. Any delay in reporting a data breach may exacerbate the incident and so it is important that it is reported as soon as possible.
	6. Staff must only use official HASU email accounts for performing HASU work and business. Personal email accounts may not be secure and there is a high risk of personal data on these accounts being accessed by unauthorised persons. Staff must not auto-forward any emails from their HASU email account into a personal email account. All work-related data must be saved to the University networked drives and must not be saved to portable or personal media. Staff must not introduce any unauthorised software on the HASU systems as this may jeopardise the security of the computer systems.
	7. Staff should not routinely collect personal data as part of campaigns. Where personal data is collected for research purposes, it must be held in accordance with this policy and data protection legislation.
	8. Passwords used to access any of the computer systems must comply with the complexity requirements of the University and be changed at least every 6 months. If any staff member suspects that their password has been compromised, they must change the password immediately. This can be done by keying Control/Alt/Delete at the same time and selecting ‘Change Password’. All login and password credentials are personal to an individual. These credentials must never be shared with any other person.
	9. If you are working on your computer and you leave your desk, you should always lock your screen in order to prevent any unauthorised access during your absence. This can be done by pressing the Windows key and ‘L’ on your keyboard.
	10. A deliberate or negligent breach of this policy may result in disciplinary action being taken against a staff member in accordance with our disciplinary procedure.

Appendix 1

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**Harper Adams Student Union Layered Notice**

**under the provisions of the**

**UK GDPR**

**and the**

**Data Protection Act 2018**

**Layered Notice for Harper Adams Students’ Union**

**This layered notice should be read in conjunction with and in addition to any data collection and/or privacy notices attached to forms produced or printed by Harper Adams Students’ Union (HASU).**

**HASU only hold very limited data about its members. This is generally only their student ID, name, gender, email address, postal address, phone number, course and year of study details. This allows us to contact specific groups of students concerning events, groups or services we provide. We also need to hold data for anything you buy from our shop or for any memberships you hold within our groups.**

1. What is Data Protection?

HASU complies with data protection legislation guided by the six data protection principles that are outlined in Article 5 of the UK GDPR.

Article 5 Principles relating to processing of personal data.

Personal data shall be:

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject (‘lawfulness, fairness and transparency’).
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with [Article 89(1)](https://uk-gdpr.org/chapter-9-article-89/), not be considered to be incompatible with the initial purposes (‘purpose limitation’);
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (‘data minimisation’).
4. Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (‘accuracy’).
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with [Article 89(1)](https://uk-gdpr.org/chapter-9-article-89/) subject to implementation of the appropriate technical and organisational measures required by this Regulation in order to safeguard the rights and freedoms of the data subject (‘storage limitation’);
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures (‘integrity and confidentiality’).

Harper Adams Student Union is a Data Controller under the provisions of the UK GDPR and the Data Protection Act 2018 and are registered with the Information Commissioners Office. Our certificate number is ZA093834 and is viewable here.

1. What are my rights?

You have a number of rights under the Data Protection Act 2018 and the UK GDPR in respect of the information which HAU holds about you, and how we can use that information. These include:

* the right to access Personal Data held about themselves;
* the right to prevent processing of Personal Data for direct marketing purposes;
* the right to have Personal Data rectified if it is inaccurate;
* the right to have their Personal Data erased (the ‘right to be forgotten’);
* the right to restrict processing in certain circumstances;
* the right to data portability in certain circumstances;
* the right to compensation for any damage/distress suffered; and
* the right to be informed of automated decision making about them and the right to object to such processing and to not be subject to automated decision making which produced legal effects concerning the individual.
1. What information does the Students’ Union hold about me?
2. Harper Adams University regularly provides HASU with an up-to-date list of current students, along with other non-sensitive personal data, such as your University email address, course and year of study. A date of birth is only provided for all students under the age of 18 years at enrolment, for licencing purposes.
3. During the course of your academic studies, HASU will store data that you provide to us, based on your interaction and services used. For example, if you decide to join a particular sports club or purchase tickets for events, then this data will be stored by HASU.
4. HASU will make a record of any notable incidents that occur during the course of any events operated or run by HASU. This is done for insurance purposes as well as to support the University disciplinary policy. As a result, information that is held by HASU may be shared with the University for disciplinary purposes.
5. Students who store their shotguns on campus will need to provide HASU with additional data including details of their licence. These details will be shared with the university and if required the police. HASU will also keep a record of when the guns are signed in and signed out as a condition of storage.
6. With whom do HASU share my data?
7. HASU may share your data with a number of organisations with whom we work and who provide services to the membership of HASU. These companies are as follows:
* MSL – Membership Solutions Ltd, Provider of web-based services for the SU,
* Native – When you purchase tickets to SU events, you will do so through the Native website, who are our ticketing platform,
* BUCS – British Universities and Colleges Sports. This is the organisation that facilitates competitive sports fixtures against other students’ unions.
* Endsleigh Insurance – These are our insurers and so we will inform them of any incidents, including names of students who have been involved in any incidents where there may be a legal claim against the SU or individual students,
* Harley Medical / MW Medics – These provide paramedics and first aid cover at SU events,
* Arch Virtual Assistants – Provide administrative support to the SU and will have access to data contained within and documentation that they are dealing with,
* Image Scotland - If you purchase a clothing item via the HASU website, then you will be transferred to their website, where you will be invited to complete their purchase.
* Deputy - Some students will be able work part-time for HASU, such as working at the SU bar. Details of workers will be held by HASU and will be stored on the Deputy system/software, for payments and tax purposes.
* The University – HASU may share information about students, with Harper Adams University, in the case of any concern about the mental health of a student. HASU do not have the capacity or capability to deliver help or treatment for mental health issues. Therefore, if we should become aware of any student, whom in our opinion requires mental health support, then we will refer the student to the relevant department within the Student Services Department.
	+ Information concerning the storage of firearms at the University is shared with the University and may also be shared with the police.
	+ Harper Adams University have a student disciplinary policy. If HASU becomes aware that any student has breached this policy, then we will offer the University support, including any evidence or statements of witnesses, to conduct an investigation into any incident that may have breached the disciplinary policy.
* BREATH & Employment records - HASU also employ a number of permanent staff to run the SU. The employment records of permanent staff are stored mainly on paper records within the SU office. They are accessible by the Union Director and their Deputy and are stored in a locked cupboard. These employment records are also stored on BREATH, a human resources platform that also facilitates staff annual leave, LIEU and sickness absence.
* Howards Accountants – This company provides finance services including management accounting & payroll.
* WR Partners – This company provides our annual audit.
* Survey Monkey/Jotform – HASU does not share student data with these companies, but we do utilise their services and you may at times be asked to provide information in response to surveys which HASU will then access.
* ESP Security – To assist us in managing our venue to ensure a safe and enjoyable environment for students to socialise we do need to share some limited data with our security partners.
1. How long is my data held by HASU?

All Personal data held by HASU is held in accordance with our Record Retention Schedule

Complaints and further information

Any complaints or requests for further information about the handling of personal data by HASU should in the first instance be forwarded to the SU Director. There is also further information on the complaints procedure on our website that is available [here.](https://www.harpersu.com/getinvolved/onlineforms/sucomplaints/)

Alternatively, you may also contact the Information Commissioners Office for further advice or to raise a complaint. They may be contacted as below.

ICO website: <https://www.ico.org.uk>

Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Helpline number: 0303 123 1113

Appendix 2

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**Harper Adams**

**Students’ Union**

**Personal Data**

**Record Retention Schedule**

**Data Owner for Students Union Data: Union Director**

|  |  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- | --- |
| **Data type held** | **Is it special category data?** | **Where did it come from?** | **Is the data shared?** | **Art 6 – lawful basis for processing** | **Retention Period** | **Notes** |
| **Nominal Student’s Data to create a record:*** Name
* University email address
* Course
* Year of Study
* DOB
* Gender
 | Yes - gender | HAU share the data with HASU. | MSLMembership Solutions Ltd | Legitimate Interests | HASU are required to retain some student data for up to 3 years after a student has left the University, to allow for any legal claims. This is stored on the MSL platform. Following this period, a student’s data is either deleted or pseudonymised before being securely deleted a further 3 years later.Pseudonymisation is defined as the removal of the following attributes present in the MSL database – all name data, date of birth, all addresses and residence data, all contact data, all course data with the exceptions listed below. | A new, updated spreadsheet of current students is downloaded several times each year.DoB is required for bar sales and driving of some vehicles (society outings) |
| **Firearms**Any student who wants to bring a shotgun to the University campus will have their details recorded | No | Provided by the data subject to the SU. | Shared with the University and with Police | Legitimate interestLegal Obligation | 3 years |  |
| **Ad Hoc data**1. Mental Health concerns
 | May be SCD dependent on circumstances | Data subject or other concerned person. | May be shared with HA University staff. | Legitimate interestLegal Obligation | 1 year |  |
| **Ad Hoc data**1. Disciplinary matters
 | May be SCD dependent on circumstances | Disciplinary matters may be reported to the SU from various sources. | May be shared with HA University staff if necessary | Legitimate interestLegal Obligation | 12 months after student leaves/ finishes course |  |
| **Ad Hoc data**1. Complaints
 | May be SCD dependent on circumstances | Complaints may be made by or about SU members. This data will come from whoever the complainant is. | May be shared with HA University staff if appropriate | Legitimate interestLegal Obligation | 18 months after the complaint is closed |  |
| **BREATHE & Employment**HASU employ a number of full-time staff. Their personal / HR records are stored on BREATH | May contain SCD | From Data SubjectOther sources? References? |  | Legal obligationContract | 3 years | What about pension contributions & tax purposes?Do you keep a basic record documenting post holder? |
| **Incidents, Accidents & Injuries** | May contain SCD | See Endsleigh & first aid provision below | May be shared with HAU, Insurance provider or First Aid provider.  | Legitimate InterestsLegal Obligation | 7 Years or time limit for PI claim. | This data will be initially recorded by another service provider, but HASU may need to create records of these incidents, for H&S or insurance purposes.  |
| **Health Declaration Forms** | May contain SCD | Provided by student upon purchase of gym membership | May be shared with HAU, Insurance provider or first aid provider | Explicit consent | 3 Years | In order to satisfy that gym members are fit and well to use the gym we require a self-declaration form. |
| **Arch Virtual Assistants** | May be SCD - depends on circumstances | Provided to Arch VA by HASU, for completion of admin support. | Temporarily shared | Contract | 1 year | AVA provides admin support to HASU. Documents and data will be shared to allow the completion of the work required.  |
| **Endsleigh Insurance** – SU insurers | Maybe – depends on circumstances | HASU have to record details of any accidents or incidents where there may be a legal claim. | Shared with our insurers | Contract | 7 years | Incidents that may give rise to a claim will be reported to the insurers and details retained for this purpose. |
| **Deputy** | Personal data | HASU finance | May be shared with our auditors and/or HMRC | Legal ObligationContract | 3 years | Students who work on a part time basis for the SU have their details including payments and tax held on Deputy |
| **ESP Security** | Personal data | Gathered by ESP in relation to incidents that occur & dealt with by ESP.  | ESP provide this data to HAU and HASU may provide ESP with some data about students banned from the licenced premises.  | Contract | 1 year from the end of the academic year | ESP provide security at SU events and deal with a wide variety of incidents. The details of these events are shared with HASU.  |

**Student data recorded by platforms providing a service to HASU**

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| HASU receives limited student data from the University, at the beginning of each academic year. An updated version of this data is available during the year to take account of students who may join University courses at other times of the year. This will include students such as apprentices or those undertaking short courses or top-up options. In order to provide services to students, the SU uses a number of different platforms, that students are directed to by hyperlinks from the SU website. In all these cases, the SU do not hold the data that is provided to these platforms. The SU may, however, have access to the data. E.g., The SU have access to Native data, so that we can see who has purchased tickets to events and functions. HASU may also create additional records based upon the need to service these other requirements, such as Firearms Records or accidents that may be reported to our insurers.  |

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Partner Platform** | **Data Category** | **Data Source** | **HASU Accessed** | **Do HASU make a record of this data?** | **Notes** |
| **MSL** | No SCD.Basic student data | HASU | Yes | No HASU provide it | MSL host HASU’s digital/web platform. HASU provide MSL with basic records. Students use MSL to purchase club & society membership, some event tickets & merchandise. MSL also provides the election functionality that enables HASU to fulfil its legal obligations under the Education Act to run cross campus democratic elections for its key leadership positions. Sharing data is therefore essential for HASU to operate. |
| **Native** – if tickets are purchased for SU events – it is done through this ticketing platform | No SCD | Provided by the student to Native | May share with HASU – such as ticketed events | No | MSL provide Native with a unique user ID which confirms they are a student at Harper and exist on the MSL data set. No data is shared. It allows for Native to sell tickets on a “student only” basis and also has the technical capability to allow us to sell tickets to individual student groups.The Native platform provides us with additional ticketing functionality including door entry system. |
| **BUCS** -British Universities & Colleges SportsThis platform is used to run sports club’s memberships | No | Provided by the student to BUCS | HASU have access to this data |  |  |
| **Paramedic & First Aid provision**Provide paramedic cover for sporting and other SU events | Maybe – depends on circumstances | The paramedics will gather their own data based on individual circumstances.  | Although not shared in detail with the SU, some basic facts of the incident may be shared for insurance & H&S purposes. |  |  |
| **Sum Up** | Financial transactions |  |  |  | Sum Up are used to provide financial transactions for HASU functions |
| **Image Scotland** | Personal data |  | No |  | Image Scotland sell clothing relating to HASU. Students are directed to their website from the HASU website.  |

Appendix 3

**Harper Adams Students Union – Privacy Notice**

**This notice applies to personal data belonging to students and supplied to**

**HASU by Harper Adams University.**

|  |  |
| --- | --- |
| **Controllers****Contact details** | Harper Adams Students Union (HASU)Harper Adams University, Edgmond, Telford, TF10 8NBEmail:  studentsunion@harper-adams.ac.uk |
| **The data we collect** | Harper Adams University (HAU) provide the Students Union with some basic data about each student. This data consists of your name, University email address, date of birth, course, year of study and gender.We will use this data in order to contact you when you join the University. HASU also share this data with MSL, who provide the main purchasing and ticketing functions on behalf of HASU. We need to provide this information so that MSL are aware of the details of our current students and allow them to log into their web site.When purchasing goods or services from HASU, we direct you to third party web sites, such as MSL for purchasing tickets to functions or BUCS for sports teams. These third-party web sites will ask you to provide some personal data. HASU may also have access to this data. E.g. HASU will know who has purchased tickets to functions in the bar.  |
| **Lawful basis to process data** | Most of the personal data that HASU processes about students are processed under the Legitimate Interests basis (Article 6 (1) (f) There is however also some personal data that is processed under Legal Obligation (Article 6 (1) (c) such as pay details for students who work for HASU. This is necessary for tax purposes.To see a full range of the Personal Data that is processed by HASU, see the HASU Layered Notice and the Record Retention Schedule.  |
| **How we store your data** | All of the Personal Data that we store, and process is stored on the University servers, which are protected by a wide range of technical and organisational measures, which ensure the security of your data.  |
| **Your Rights** | Under Data Protection legislation, you have a variety of rights including a right of access, rectification or erasure. To find out about any of these or your other rights under Data Protection legislation, please contact HASU on the email above.  |
| **For further information or to make a complaint** | Information Commissioner’s Office, Wycliffe House, Water Lane, Wilmslow,Cheshire, SK9 5AFHelpline number: 0303 123 1113ICO website: <https://www.ico.org.uk>  |