

London South Bank University

Halls of Residence Privacy Notice

Purpose of this Notice

We, London South Bank University (LSBU) of 103 Borough Road, London, SE1 0AA telephone number: 020 7815 7815 are the data controller for the personal data that we process relating to you.

This Privacy Notice explains how we will process your personal data in relation to services provided by Halls of Residence. LSBU is registered as a data controller with the Information Commissioner's Office, our data controller registration is Z6533032 and our registration can be viewed at <https://ico.org.uk/about-the-ico/what-we-do/register-of-data-controllers/>.

Amendments may be made to this Privacy Notice. However, the current version of this Privacy Notice can always be found at <https://www.lsbu.ac.uk/footer/data-protection/privacy-notices>.

Details of how the University complies with Data Protection Law (the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and other applicable law about the processing of personal data and privacy) are set out in the Data Protection Policy which is available at https://www.lsbu.ac.uk/data/assets/pdf_file/0004/11686/university-data-protection-policy.pdf.

“Personal data” refers to information relating to a living, identifiable individual. It can also include "special categories of data", which is information about your racial or ethnic origin, religious or other beliefs, and physical or mental health, the processing of which is subject to strict requirements. Similarly, information about criminal convictions and offences is also subject to strict requirements.

“Processing” means any operation which we carry out on your personal data e.g. obtaining, storing, transferring, deleting.

Your personal data

We hold a range of personal data about you which you provide to us directly. We may also, where lawful, collect personal data about you from third parties (including family members, government agencies, Local Authorities, tax or law enforcement agencies, Student Finance, or publicly available information about you). **See below for further details of personal data we receive from third parties.** Examples of categories of personal data which we hold are:

<ul style="list-style-type: none">• Name and home/contact address• Contact information (including telephone/mobile numbers, email addresses)• Title• Date of birth and age• Gender• Identity photographs• Proof of identity and immigration data (including passports/visas where applicable)• Place of birth, nationality, residence• Financial information (including student funding, debts to LSBU, bank and payment details)	<ul style="list-style-type: none">• Academic courses you're enrolled on• Information about your status as a Care Leaver• Halls Disciplinary Procedure data• Student Disciplinary Procedure data• Feedback and survey responses, including your interests and preferences• Any other personal data voluntarily provided by you, or provided on your behalf• Name and contact details of emergency contacts• Name and contact of parents or guardians where applicable
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We may also hold more sensitive personal data about you:

<p>Special category personal data:</p> <ul style="list-style-type: none">• Health information (including any disabilities and reasonable adjustments)• Religion and ethnicity where relevant for allocation purposes• Equality-monitoring data	<p>Criminal convictions data:</p> <ul style="list-style-type: none">• Actual or suspected criminal offence and/or conviction data• Police investigations data
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We may also hold personal data relating to guests of residents, e.g. name, contact details, details of any incident in which they might be involved.

The purposes for which we process your personal data and the legal basis

When you are applying for one of our Halls of Residence, we process your personal data for the purposes of assessing your application and suitability.

If you take up a place at one of our Halls of Residence, we process your personal data for the purposes of providing you with Halls of Residence services.

If you are unsuccessful or do not take up a place at one of our Halls of Residence, we will retain your personal data in line with our retention schedules for statistical and audit purposes or in the event of a complaint or an appeal.

We only process data for specified purposes and if it is justified in accordance with data-protection law. The table below lists the various purposes for which we process personal data and the corresponding justification for it. Some processing of your personal data is justified on the basis of contractual necessity. In general, this applies to personal data you provide to us to process your application and, if admitted to a Halls of Residence, for performance of the Halls of Residence contract. Without that information, we would be unable to provide you with Halls of Residence services.

No.	Purpose	Legal basis/justification
1.	Assessing your application and suitability for residing in a Halls of Residence.	Processing is necessary for the purposes of taking steps prior to entering into a contract with us.
2.	Assess and consider allocation requirements for residents based on a range of criteria (including medical, distance of home address, care leavers, religious/cultural/ethnic requirements).	Consent. Explicit consent where sensitive/special category data is processed.
3.	Assess any safeguarding risks posed by residents to other residents and staff.	Processing is necessary for the purposes of taking steps prior to entering into a contract with us and

No.	Purpose	Legal basis/justification
		for performing the contract. Also Processing is necessary for performing a task carried out in the public interest and necessary for the purposes of prevention or detection of an unlawful act (Paragraph 10 of Schedule 1 of the Data Protection Act 2018) and necessary for safeguarding (Paragraph 18 of Schedule 1 of the Data Protection Act 2018).
4.	Identifying residents and their guests, manage Halls of Residence, and deliver Halls of Residence services, including allocating rooms etc.	Contractual necessity.
5.	Process payments of fees for your accommodation and any other related costs (e.g. damages), and debt recovery.	Contractual necessity
6.	Respond to and deal with additional accommodation-related queries or needs, and in order for the University to carry out its duties and rights.	Contractual necessity
7.	Provide student welfare or pastoral services, reasonable adjustments.	Explicit consent.
8.	Contact emergency contact in case of an emergency.	Consent

No.	Purpose	Legal basis/justification
9.	Contacting emergency services in case of an emergency.	Vital Interests and applicable conditions within Schedule 1 of the Data Protection Act 2018, including Paragraph 2 and Paragraph 18.
10.	Comply with mandatory tax reporting to HMRC.	Legal obligation.
11.	Assisting with lawful requests by government and regulatory authorities, and law enforcement agencies (including Local Authorities, Police, Department of Work and Pensions).	Legal obligation where we are under a legal obligation to respond. Task in the public interest, or significant public interest where there is legal authority to disclose information, and applicable exemptions within Schedule 2 of the Data Protection Act 2018, conditions set out in Schedule 1 for Special Category data.
12.	Complying with electoral registration requirements for students in Halls of Residence.	Legal obligation.
13.	Manage and respond to health and safety incidents.	Contractual necessity and to comply with our legal obligations under health and safety legislation.
14.	Protecting our staff, residents, property and assets (including dealing with misconduct through the Halls Disciplinary Procedure, the Student Disciplinary Procedure and the prevention and detection of crime). This includes use of CCTV footage	Contractual necessity and necessary for our legitimate interest in safeguarding our property and assets, and applicable exemptions within Schedule 2 of the Data Protection Act 2018.

No.	Purpose	Legal basis/justification
	and access control data.	
15.	Administering complaints	Contractual necessity. Explicit consent where sensitive/special category data is processed.
16.	Monitoring the effectiveness of LSBU and Halls of Residence quality and diversity policy.	Processing is necessary for performance of a task in the public interest and reasons of substantial public interest in identifying and keeping under review the existence or absence of equality of opportunity or treatment and enabling such equality to be promoted and maintained (Paragraph 8 of Schedule 1 of the Data Protection Act 2018).
17.	Providing reporting data to regulators, funding bodies and government agencies.	Legal obligation and public task.
18.	Analysis of statistics, including measuring satisfaction.	Legitimate interests
19.	Send surveys and marketing information relating to Halls of Residence services or LSBU. Keep you updated on Halls of Residence and LSBU services which may be of interest or relevance to you.	Legitimate interests in promoting a positive student experience. Consent when engaging with residential experience services.

There may be other processing in addition to the above, for example, when you access our website which uses cookies or when we take photos of our events and publish them. This is done on the basis of our policies and we will inform you about such processing at the time when the data is obtained or as soon as reasonably possible thereafter.

Where the basis of processing your personal data is contractual necessity and you fail to provide the personal data in question, LSBU may not be able to process your application or provide you with Halls of Residence services.

Personal data received from third parties

No.	Source	Data which may be shared with us
1.	Sponsors/Guarantors.	Name, proof of funding.
2.	Medical, mental health, accessibility-related and similar information. This is special category personal data. We only obtain this information from third parties if you give us consent to do so or if it's a matter of life and death.	Medical practitioners and/or family members.
3.	Student Loan Company.	Name, proof of student loan/financial status.
4.	Home Office (UKVI).	Your immigration status.
5.	Office of the independent Adjudicator (OIA), and/or Competition and Markets Authority.	Details of any Halls of Residence-associated complaint.

Recipients of personal data

On occasion we may need to share your data with third parties. The following table lists what information we may share with whom:

No.	Recipients	Data which we may share with them
1.	Electoral Registration Office.	Name, address, contact details, domicile, nationality.
2.	Debt collection agencies, in relation to debts where the University's own recovery attempts have proven unsuccessful.	Name, contact details, enrollment information, financial details.
3.	Police.	Contact details and other information relating to the incident in question if there is a legal basis.
4.	The Courts.	Name, contact details, financial information.
5.	Local Authorities.	Name, contact details, information relating to council tax and social housing, information relating to care leavers/vulnerable adults.
6.	UK Home Office.	Passport details, contact details, accommodation details.
7.	Education providers.	Contact information, financial information.
8.	Emergency services.	Personal data including potentially special category data if necessary.
9.	Close family and next of kin.	Personal data including potentially special category data if necessary where there is an emergency situation such as illness or serious injury.

No.	Recipients	Data which we may share with them
10.	References to prospective landlords (by consent only).	Name, reference information.
11.	London South Bank Student Union.	Information considered during disciplinary panels, or in response to the Union acting as an agent on behalf of a resident.
12.	University's insurers and internal and external auditors, Health and Safety Executive in respect of accidents or incidents connected with Halls of Residence.	Resident details and details in relation to any incident.
13.	London Borough of Southwark or other members of the Channel Panel, a programme which provides support to individuals who are at risk of being drawn into terrorism as defined in Part 5, Chapter 2 of the Counter Terrorism and Security Act 2015.	Contact details and other information that the University could be required to supply in order to comply with the Counter Terrorism and Security Act 2015.
14.	Data processors i.e. third parties who process personal data on our behalf e.g. software providers.	Information held on our IT systems.
15.	Sponsors/Guarantors.	Information relating to you financial status.
16.	Office of the independent Adjudicator (OIA), and/or Competition and Markets Authority.	Information relating to complaints under the Halls of Residence Complaints Procedure.

No.	Recipients	Data which we may share with them
17.	Regulatory bodies, where you are on a professional programme.	Contact details, disciplinary matters which may affect fitness to study or fitness to practice.
18.	Government agencies i.e. HMRC*.	Contact details and potentially other information if requested where there is a legal basis.

Overseas transfers of personal data (i.e. outside the European Economic Area (EEA))

Where possible, we aim to hold personal data relating to students within the EEA. Where any of your personal data is transferred outside the EEA it will be subject to a legally binding data sharing agreement and to an adequacy decision by the European Commission (country, territory or specified sectors), or other appropriate safeguards as set out in Article 46 of the GDPR.

Retention of data

The length of time that we keep your personal data for is set out in the Student Records Retention Schedule at

https://www.lsbu.ac.uk/data/assets/pdf_file/0003/11928/student-records-retention-schedule.pdf.

Your rights as a data subject

As a data subject, you have the following rights in relation to your personal data processed by us:

- To gain access to your personal data;
- To rectify inaccuracies or where appropriate, given the purposes for which your data is processed, the right to have incomplete data completed;

- To have your personal data erased. This is a limited right which applies, among other circumstances, when the data is no longer required, consent has been withdrawn and/or the processing has no legal justification. There are also exceptions to this right, such as when the processing is required by law or in the public interest;
- To object to the processing of your personal data for marketing purposes. You may also object when the processing is based on the public interest or other legitimate interests, unless we have compelling legitimate grounds to continue with the processing.
- To restrict the processing of your personal data. This is a limited right which will apply in specific circumstances and for a limited period.
- To obtain a copy of your data in a commonly used electronic form if the data is processed by automated means and the processing is based on your consent or contractual necessity.
- To not have decisions with legal or similar effects made solely using automated processing, unless certain exceptions apply.

Where we are relying on your consent to process your data, you may withdraw your consent at any time. Your requests will be considered at the latest within one month.

Exercising your rights, queries and complaints

For more information on your rights, if you wish to exercise any right or for any queries you may have or if you wish to make a complaint, please contact our **Data Protection Officer** at:

Address: London South Bank University, 103 Borough Road, London, SE1 0AA

Email address: dpa@lsbu.ac.uk

Complaints to the Information Commissioner

You have a right to complain to the Information Commissioner's Office (ICO) about the way in which we process your personal data. You can make a complaint on the ICO's website <https://ico.org.uk/>.