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LSBU

# Halls of Residence Privacy Notice

Notice last reviewed

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Approved by

Chief People and Legal Officer

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LSBU website, Under About Us, Policies and Procedures tab. For latest version, go to:

[https://www.lsbu.ac.uk/about-us/policies-regulations - procedures](https://www.lsbu.ac.uk/about-us/policies-regulations-procedures)

**This Notice is available in accessible formats on request from the Data Protection team. Please contact: [dpa@lsbu.ac.uk](mailto:dpa@lsbu.ac.uk)**

## 1. Purpose of this Notice

London South Bank University (LSBU, We, our, us) 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-datacontrollers/>

This Privacy Notice explains how we will process your personal data in relation to services provided by our Halls of Residence. The notice covers both data we collect directly from you and data provided to us by third parties. In the process of your application, you may be presented with separate Privacy Notices in relation to specific services or activities LSBU provides, such as Open Days. These should be read in conjunction with this document.

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/data/assets/pdf\\_file/0008/95642/data-protection-notice.pdf](https://www.lsbu.ac.uk/data/assets/pdf_file/0008/95642/data-protection-notice.pdf).

Details of how the University complies with Data Protection Law UK General Data Protection Regulation ('UK GDPR') (as implemented by the Data Protection Act 2018), and the EU General Data Protection Regulation 2016/679, 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-protectionpolicy.pdf](https://www.lsbu.ac.uk/data/assets/pdf_file/0004/11686/university-data-protectionpolicy.pdf).

**"Personal data"** refers to information relating to you, for example your name, date of birth or email address. It can also include "special category" data, which includes 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.

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

## **2. Your personal data**

We hold a range of personal data about you, some of which you provide to us directly and some of which we receive from third parties, such as 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.**

Categories of personal data we may hold for you include:

- Personal and contact details and preferences such as name, date of birth, email.
- Financial information (including student funding, debts to LSBU, bank and payment details, DSS information)
- Proof of identity and Immigration information (e.g., passport details, Visa information, place of residence, nationality, identity photographs).
- Care leaver status.
- Health information (including any disabilities) and other equality-monitoring data you provide to us.
- Religion and ethnicity where relevant for allocation purposes.
- Actual or suspected criminal offence and/or conviction data. Police investigations data.
- Feedback and survey responses, including your interests and preferences
- Details of any engagement with the Student Disciplinary Procedure, Halls Disciplinary Procedure or Mental Health and Wellbeing services at LSBU
- Any other personal data voluntarily provided by you, or provided on your behalf
- Name and contact information for your parents, guardian and emergency contact.

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.

## **3. Purpose and legal basis for processing your data**

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.

Data Protection Law requires us to have a justification to support each instance in which we process your personal data, which is called our Legal basis for processing. The table below details the main purposes for processing personal data undertaken by LSBU and the supporting Legal Bases.

Data will be retained for up to seven years after you leave in line with legal record keeping obligations and then destroyed securely.

No.	Purpose	Legal basis
1.	Assessing your application and suitability for residing in a Halls of Residence.	Performance of a contract
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).	Performance of a contract  Explicit Consent for the special category data
3.	Assess any safeguarding risks posed by residents to other residents and staff.	Public interest - 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.	Performance of a contract

No.	Purpose	Legal basis
5.	Making reasonable adjustments for disabilities and providing relevant support to students with ill health and providing wellbeing support. This includes processing special category information.	Performance of a contract  Explicit Consent.
6.	Process payments of fees for your accommodation and any other related costs (e.g., damages), and debt recovery.	Performance of a contract
7.	Respond to and deal with additional accommodation-related queries or needs, and in order for the University to carry out its duties and rights.	Performance of a contract
8.	Provide student welfare or pastoral services, reasonable adjustments and assessment needs.	Explicit Consent.
9.	Monitoring the effectiveness of LSBU's equality and diversity policy.	Public interest.  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).

10.	Contacting emergency services and/or emergency contact in case of an incident	Consent or Vital Interests for emergency services. Vital Interests and applicable conditions within Schedule 1 of the Data Protection Act 2018, including Paragraph 2 and Paragraph 18.
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No.	Purpose	Legal basis
		(Prior) Consent for emergency and trusted contacts
11.	Complying with mandatory requirements. For example, tax reporting (HMRC) or Electoral register requirements	Legal Obligation
12.	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.
13.	Manage and respond to health and safety incidents.	Performance of a contract  Legal obligations under health and safety legislation.

14.	Protecting our staff, residents, property and assets (including dealing with misconduct through the Halls Disciplinary Procedure, and the prevention and detection of crime). This includes use of CCTV footage and access control data.	Performance of a contract  Legitimate interest in safeguarding our property and assets, and applicable exemptions within Schedule 2 of the Data Protection Act 2018.
15.	Administering complaints	Performance of a contract  Explicit consent where sensitive/special category data is processed
16.	Providing reporting data to regulators, funding bodies and government agencies.	Legal obligation.  Public task.
<b>No.</b>	<b>Purpose</b>	<b>Legal basis</b>
17.	Analysis of statistics, including measuring satisfaction. Legitimate interests	Analysis of statistics, including measuring satisfaction. Legitimate interests
18.	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.

#### 4. Personal data received from third parties

No.	Data	Possible Source
1.	Name, proof of funding.	Sponsors/Guarantors
2.	Your immigration status.	Home Office (UKVI).
3.	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 (vital interests)	Another institution, medical practitioners and/or family members.
4.	Your financial status, proof of student loan or evidence of sponsorship.	Student Loans Company
5.	Details of any Halls of Residence-associated complaint.	Office of the independent Adjudicator (OIA), and/or Competition and Markets Authority

#### 5. Recipients of personal data

Your personal data may be disclosed to other organisations as required by law, for crime prevention, investigation, or detection purposes or in order to protect your vital interests. In addition, LSBU may disclose your personal data LSBU may share your data with third parties as detailed below.



No.	Recipients	Data which we may share with them
1.	Electoral Registration Office and Southwark Council.	Name, address, contact details, domicile, nationality.
2.	Relevant government departments and law enforcement agencies (e.g., Home Office, Department of Education, Department of Health, The Metropolitan Police).	Contact details, nationality, visa status, accommodation details, details of any incidents.
3.	Our sector regulators/quasi-regulators (The Office for Students (OFS), the Office of the Independent Adjudicator (OIA), and the Competition and Markets Authority).	Contact information, information relating to any complaints under our Halls of Residence complaints procedure.
4.	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.

No.	Recipients	Data which we may share with them
5.	<p>LSBU's Data processors e.g., Salesforce, QSES</p> <p>We use the services of third-party service providers to help us run LSBU, particularly in relation to our IT systems. Some of these services involve the service provider holding and using your personal data. When we share your information in this way, the service provider is required to keep it secure.</p>	Information held in our IT systems.
6.	Professional Statutory and Regulatory Bodies, when you are on a professional programme	Contact details, disciplinary matters which may affect fitness to study or fitness to practice.
7.	Sponsors/Guarantors.	Information relating to your financial status.
8.	<p>University's insurers and internal and external auditors, Health and Safety</p> <p>Executive in respect of accidents or incidents connected with Halls of Residence.</p>	Resident details and details in relation to any incident.
9.	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.
10.	References to prospective landlords (by consent only).	Name, reference information.

11.	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.
12.	Emergency services and professional Support Services	Personal data including potentially special category data if necessary.
13.	Debt collection agencies, in relation to debts where the University's own recovery attempts have proven unsuccessful.	Name, contact details, enrolment information, financial details.
14.	The Courts.	Name, contact details, financial information.
15.	Local Authorities.	Name, contact details, information relating to council tax and social housing, information relating to care leavers/vulnerable adults.
16.	Education providers.	Contact information, financial information.
17.	Trusted Contact, if you have nominated one.	Any information relevant to our concerns. Please see the <a href="#">Trusted Contact Guidance</a> for further details.
18.	Social media providers (e.g WhatsApp)	We may use social media to contact you about any issues in the Halls or if you raise an issue via a social media channel. Please be aware that all devices are shared between staff and we recommend that you do not share personal data with us via WhatsApp

## **6. Overseas transfers of personal data (i.e., outside the UK or European Economic Area (EEA))**

Where possible, we aim to hold personal data relating to students within the UK and 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 we will ensure appropriate safeguards are in place. **If you are an international student we may share data with third parties in your home country.**

## **7. 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/studentrecords-retention-schedule.pdf](https://www.lsbu.ac.uk/_data/assets/pdf_file/0003/11928/studentrecords-retention-schedule.pdf).

## **8. Your rights as a data subject**

The UK GDPR gives you certain rights:

- A) The right to be informed – we will inform you if we are using or storing your personal information.
- B) The right of access – you can ask us for a copy of your personal information by making a subject access request.
- C) The right to rectification – if you think the personal information, we hold about you is not right you can ask us to correct it.
- D) The right to erasure – you can ask us to delete your information and, if we are able to, we will do so.
- E) The right to restrict processing – you may want to stop us from using your information for some purposes.
- F) The right to information portability – as well as being able to ask for a copy of your information you can ask for it to be in a format that makes it accessible if you wish to share it with others.

G) The right to object – If you are concerned about how we are using your information tell us.

H) Rights in relation to automated decision making and profiling – if you think that we have made a decision about you automatically (by, for example a machine or computer) you can ask for the decision to be reviewed by a living person.

These rights are not absolute. Whilst you can ask for certain things to happen, there may be reasons why we cannot comply. For example, we may have to keep information that you would like deleted for legal purposes. Your rights are also included in our privacy notices but for more detailed information please refer to the Information Commissioners Office

### **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:

Alice

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

Email address: [dpa@lsbu.ac.uk](mailto: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/>.