

London School of Hygiene & Tropical Medicine Privacy Notice for Students

London School of Hygiene & Tropical Medicine (a higher education institution established by Royal Charter and an exempt charity with registration number RC000330) of Keppel Street, London, WC1E 7HT, is a data controller for the purposes of the Data Protection Act 1998 and the General Data Protection Regulation (GDPR). The School undertakes to treat your personal data in accordance with these data privacy laws.

This privacy notice together with our Data Protection Policy, guidance, and any additional documents referred to within them, explains how we process your personal data. Please read this notice carefully. If you have any questions in relation to the School's processing of your personal data, please contact the Data Protection Officer on dpo@lshtm.ac.uk.

This privacy notice applies to enrolled students throughout a period of study, where it leads to an award or credits from the School.

The School has to process and retain certain personal data relating to you, because of its relationship with you as one of its students.

How we obtain data about you

We receive data relating to you in various ways, including:

- What you tell us when you express an interest in being a student, either directly or at recruitment events;
- What you write in any applications for scholarships or studentships;
- What you tell us in your application;
- What you tell us when you apply for a Certificate of Acceptance for Studies (if you need a visa);
- What your referees tell us;
- What you tell us upon enrolment;
- What you tell us during your time as a student at the School;
- Information created by us that we have to hold about you during your studies, such as grades and disciplinary matters;
- Information we receive from your funding organisation;
- Information we receive from organisations who disclose information to us as part of their public function, such as UK Visa & Immigration Service or the National Health Service;
- Information we receive from partner organisations including other higher education institutions with whom we deliver collaborative educational provision.

What Personal Data we process about you

We may process the following categories of data about you:

- Personal contact details such as name, title, addresses, telephone numbers, and personal email addresses;
- Date of birth;
- Gender;
- Marital status and dependants, if relevant;
- Next of kin and emergency contact information;
- National Insurance number (and/or your home country's national equivalent);

- Bank account details;
- Enrolment date;
- Location of study;
- Application and enrolment information (including copies of right to study documentation, references and other information included as part of the application process);
- Employment records (including working hours);
- Academic engagement and attendance information;
- Disciplinary information;
- Records of any complaints or appeals you may make;
- CCTV footage and other information obtained through electronic means including swipecard records;
- Information about your use of our information and communications systems;
- Photographs of you.

We may also collect, store and use the following “special categories” of more sensitive personal information:

Information about your race or ethnicity, religious beliefs, sexual orientation and gender identity;

- Student union membership;
- Information about your health, including any medical condition, health and sickness records;
- Information disclosed to the Student Advice and Counselling Service;
- Genetic information and biometric data; and/or
- Information about criminal convictions and offences, if required, e.g. for safeguarding purposes.

Purposes of Processing

The School has to process personal data about you so that it can deliver the programme of study to you, as well as the full range of administrative and associated tasks related to that delivery. This includes:

- Delivering your programme of study;
- Monitoring academic engagement and attendance;
- Recording your attainment, such as module and assessment marks, upgrading information, and final awarded grades;
- Managing information about your accommodation (if you have arranged accommodation through the School);
- Timetabling and facilities management;
- Financial administration, e.g. studentships, scholarships and loans;
- Providing the associated services including Registry, Teaching Support Office, Student Advice and Counselling Service, Careers Service and Immigration Compliance;
- Managing disciplinary issues, complaints and appeals; and
- Internal and external communications and marketing.

Legal Basis for Processing Your Personal Data

We will process your personal data under the following legal bases:

To perform the student contract

If you accept an offer to enrol as a student of the School, you must accept our student terms and conditions. Once you have accepted these terms, it creates a contract between you and the School. From that point onward, we process your personal data so that we can meet our contractual obligations to you, and enforce your obligations to the School. Examples of the types of data involved include registration and re-registration information, managing timetables, delivering information to you on the virtual learning environment, managing absence and academic engagement, managing disciplinary issues or complaints, and administration relating to accommodation and financial issue including fees.

We would not be able to deliver your programme of study without this information.

To perform a task carried out in the public interest

The School's Royal Charter empowers it to perform certain functions to operate as a higher education institution. These functions include "promoting ... research... and education in public health and tropical medicine and such other academic subjects as [the School] may consider appropriate". Along with the contract you have with the School, we will rely on this basis for the majority of the processing we do of your personal data.

Compliance with a legal obligation

In certain circumstances we need to process your personal data to comply with a legal obligation. Examples include compliance with immigration rules and guidance set out in law and by the Home Office, compliance with equality legislation under the Equality Act 2010, and compliance with rules and guidance set out by the Office for Students.

Legitimate interests

We will occasionally process your personal data for purposes that are not a core part of the School's activities but are nonetheless in the legitimate interests of the School and also in the interests of staff. Examples of this would be the lawful and reasonable use of CCTV and visual monitoring technologies for prevention and detection of criminal activity or behaviour which could lead to disciplinary investigation, internal and external marketing, applications for charter marks and awards (such as Stonewall and Athena Swan charter marks), and staff surveys carried out as part of the School's commitment to improvement.

Those present at graduation ceremonies and certain other key events may have their names recorded in the event programme, and may be recorded in photographs and audiovisual records of the event. In certain limited circumstances you may request to object to such processing of your personal data, in which case please contact the Events team with at least six weeks' prior notice of the event and complete a form requesting to object to the processing, which can be found by following the links at www.lshtm.ac.uk/dpo.

Your consent

Whilst we do not expect it to be the case, we may need to process your data outside the lawful bases set out above. If this happens, we will seek your consent to process your data for that purpose. We will explain to you how you can withdraw your consent at the time of you giving it. If you do withdraw consent, this will not affect the lawfulness of processing based on your consent before your withdrawal.

Emergency use to protect vital interests

In exceptional circumstances, the School may process your personal data to protect your own and/or other people's vital interests. An example of this would be if the School needed to release information about you to an embassy so that you and/or others could receive urgent consular assistance.

Sharing your personal data with other bodies

We may need to share your personal data with other bodies. The main examples of this are as follows:

- University of London – for conferring degrees and administering student accommodation and careers services;
- Local Authorities – we may release your name and UK address to relevant local authorities for Council Tax exemption purposes and other local government functions such as maintenance of the electoral roll;
- Statistical returns – we submit returns to the government and its agencies including the Office for Students, the Higher Education Statistics Agency (HESA). This may include sensitive data for equality monitoring purposes, though usually these will have been aggregated and/or anonymised;
- Home Office – if you are studying on a student visa, and particularly on a Tier 4 visa, both you and the School must comply with Home Office rules, and you must meet the terms of your visa, as well as all School requirements arising from our duties and obligations as a Home Office Tier 4 sponsor licence holder. We must report to UK Visas and Immigration details of Tier 4 students who fail to enrol, who withdraw from their studies, who travel away from their normal UK term time address, who change from full time to part time or vice versa, where students interrupt their studies, where their expected end date changes, or where they fail to maintain suitable attendance and/or academic engagement. The Home Office may also make other lawful requests for information about students.
- Other higher education institutions – if you are registered on a programme which is delivered in collaboration with another higher education institution, we may need to transfer some of your personal data to that party;
- Our suppliers and service providers – we may use service providers to store or in some cases process personal data on our behalf.
- Third parties we must share your personal data with, to comply with a legal or regulatory duty, such as the Students' Representative Council.

We may also disclose your personal data to others where this is strictly necessary to enforce or apply the student contract in place with you or to investigate potential breaches of it or where this is necessary, in our view, to protect the rights, property or safety of others including our staff and students.

Transfers of personal data outside the EEA

When we share your personal data with a third party as set out above, these may involve the use of cloud computing solutions, and/or transferring your personal data to a recipient outside of the European Economic Area. Where we do this, and the recipient is in a country which the European Commission has decided does not have adequate data protection laws, we will make sure that appropriate safeguards are in place to protect your information and your rights under privacy law.

Retention of your personal data

After you have become an enrolled student, the School will hold your personal data for the amounts of time specified in our data retention schedules relating to student data. Within a reasonable time after we no longer need to retain your data, we will take reasonable steps to remove it securely from our systems. Please note some items of your personal data will be retained permanently, so that we can maintain an appropriate permanent archive of awards and provide services to alumni including confirmation of awards and replacement of certificates.

Contact details relating to student data

If you are a student and would like to update your contact details this can be done via the student portal or by contacting Registry.

If you want further information about how your personal information is used or want to correct, restrict or erase personal details, please consult www.lshtm.ac.uk/dpo or dpo@lshtm.ac.uk.