Privacy Notice

Name of Process: Processing of criminal convictions data for University accommodation allocations and ongoing management of the contract

Data Controller	Edinburgh Napier University
Purposes for collection/ processing	The protection of members of the University community from harm and abuse is a key priority for Edinburgh Napier University. The University recognises its duty of care and is committed to providing a safe and protected environment for all its students and staff. The University therefore collects and processes relevant criminal convictions data (see S.2 in the Accommodation Criminal Convictions Policy) for the purposes of fulfilling its responsibilities and obligations in this regard, to make any necessary and reasonable adjustments for the individual declaring the relevant criminal conviction/s and for the assurance of the individual and external agencies.

The University will also gather information from external bodies e.g. Police, Prison Service, Social Work departments, etc. for the purposes of conducting a risk assessment for consideration by the University's Student Disclosure Assessment Panel.

Relevant University Policies can be accessed using the following link:
• https://my.napier.ac.uk/Wellbeing-and-Support/Documents/ENU%20Safeguarding%20Policy%20Framework%20v1%20Final.pdf
• https://staff.napier.ac.uk/services/hr/HRDocuments/Documents/Protection%20of%20Vulnerable%20Groups%20Policy%20April%202019.docx
• https://www.napier.ac.uk/study-with-us/accommodation |
Legal basis	Article 6(1)(e) and Article 9(2)(g) processing is necessary for reasons of substantial public interest, and under the Data Protection Act 2018 Schedule 1 Part 2 S.11 processing is necessary for the exercise of a protective function and S.18 safeguarding (as allowed by Schedule 1 Part 3 S.36).
Whose information is being collected	Student applying for student accommodation
What type of information is collected	Personal information; Edinburgh Napier number; nature, date/s, pattern/s of offence/s; sentencing; references; contact details e.g. social work and information obtained in regards to offence/s, convictions etc.
Information source	Initially the Data Subject, but further information may be sought through Disclosure Scotland, Police Scotland, or other relevant agencies.
Method of collection	Telephone, online form, paper application form and/or emailed password protected form.

Who is personal data shared with	Internally - This information will only be accessible to staff within Student Accommodation. An anonymised report will be produced for the Student Disclosure Assessment Panel to consider. Externally – Data may be gathered from/shared with external agencies e.g. Police, Prison Services, Social Workers, etc.
How secure is the information	For services provided locally by Information Services, information is stored on servers located in secure University datacentres. These datacentres are resilient and feature access controls, environmental monitoring, backup power supplies and redundant hardware. Information on these servers is backed up regularly. The University has various data protection and information security policies and procedures to ensure that appropriate organisational and technical measures are in place to protect the privacy or your personal data. The University makes use of a number of third party, including "cloud", services for information storage and processing. Through procurement and contract management procedures the University ensures that these services have appropriate organisational and technical measures to comply with data protection legislation. The University is Cyber Essentials Plus accredited. Specifically, the data is collated on a password protected spreadsheet, restricted to specific staff, in a secure area on the University network. The online form collects data using a system called Kx. This system has been security assessed by the University and complies with the requirements of fata protection legislation.
Who keeps the information updated	Individuals are required to keep the University updated should there be a change to their information. Individuals have access to their own data through eVision, but can otherwise provide updates by contacting the relevant staff, who will then update the records. External agencies may also provide data for updating University records.
How long is the information kept for	The information will be stored for up to 18 months. This timescale allows ENU to gather information from May each year from potential new students starting in September until August the following year when the students tenancy with ENU will end.
Will the data be used for any automated decision making? No	
Is information transferred to a third country? Outside the EEA and not included in the adequate countries list? No	
You can access all the University's privacy notices using the following link: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/statement.aspx You have a number of rights available to you with regards to what personal data of yours is held by the University and how it is processed – to find out more about your rights, how to make a request and who to contact if you have any further queries about Data Protection please see the information online using the following URL: https://staff.napier.ac.uk/services/governance-compliance/governance/DataProtection/Pages/default.aspx	