

Privacy Notice - Covid-19 NHS Test and Trace

1. Purpose of this Notice

In accordance with the data protection principle that all personal data shall be processed lawfully, fairly and in a transparent manner, this Privacy Notice tells you how Teesside University as a Data Controller handles your personal data so that you are fully informed about what, how and why your data is being processed.

2. Why your Personal Data is Collected

The University is required to support NHS Test and Trace in England by collecting the details and maintaining records of staff, students, customers and visitors on our premises. NHS Test and Trace is a key part of the country's ongoing COVID-19 response. The purpose of Teesside University's processing in support of NHS Test and Trace will be to facilitate contact tracing by helping to identify people who may have been exposed to the virus.

Personal Data is also collected relating to those either presenting with Covid-19 symptoms or who are diagnosed with Covid-19 so that the University is in a position to act in accordance with its statutory health and safety obligations, taking preventative steps to avoid the spread of the illness where possible e.g. so that others who may have been in contact with you are informed and additional cleaning can be carried out, and for employment related purposes.

3. How Personal Data is Collected

Personal Data is collected from you when you access various buildings throughout the University and when you use University services. We may ask you to fill in a questionnaire based on Test and Trace questions if you report symptoms, complete Test and Trace contact forms, input your personal data onto our systems to record your visit, or we might rely on information that we derive from you directly if you report symptoms or a positive test in accordance with the Campus Community Pledge (for example when you tell us that you have been in a particular office or building) and/or the following sources:

- Symmetry Data on accessing buildings using TUSC
- My print when you print out from a University printer
- Attendance data

- Computer Login data
- Safezone
- Catering and other retail transactions
- Booking facilities e.g. Student Life Building and gym.

Anonymous reporting will give the University an indication of campus occupancy. Personal data will be used specifically for the purposes stated above.

4. **What Personal Data Is Collected**

- 4.1 Name
- 4.2 Contact details such as address or telephone number
- 4.3 Time and date of entry/exit
- 4.4 Time and data of any transaction
- 4.5 Physical location
- 4.6 Number in group

5. **How Your Personal Data is shared with 3rd parties**

We may be required to share details we have collected with NHS Test and Trace in the event that you or an individual who is present in a place at the same time as you, tests positive for Covid-19.

Where you test positive for Covid-19 and you are resident in University owned accommodation we will share that information with others in your household so that they are able to take adequate precautions including self-isolation and/or obtaining a test.

Your personal data may be shared internally where you inform us that you have tested positive for Covid-19 or where you demonstrate symptoms but have not tested positive for Covid-19 for the purposes of absence monitoring, additional cleaning and to enable the University to take preventative measures to protect its staff and students.

6. **Lawful Basis**

There are a number of lawful bases that apply under GDPR Article 6. As the data collation is information related to health we require a lawful basis under Article 9 as well as applicable conditions under the Data Protection Act 2018. These are as follows:

GDPR Article 6

GDPR Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject. As from 18 September it is a legal requirement to collect personal data and share this with NHS Test and Trace where necessary.

GDPR Article 6(1)(e) processing is necessary for the performance of a task carried out in the public interest in response to the global pandemic.

GDPR Article 9

GDPR Article 9(b): processing is necessary for the purposes of carrying out obligations in the field of employment law;

GDPR Article 9(g): processing is necessary for reasons of substantial public interest

Data Protection Act 2018

Schedule 1, Part 1(1) processing is necessary for the purposes of performing obligations in connection with employment

Schedule 1, Part 1(2) processing is necessary for the purposes of health or social care purposes

Schedule 1, Part 2 (6) processing is necessary for the exercise of a function conferred by an enactment

7. Transfers of Personal Data outside of the EEA

International processing is not envisaged within this activity but in the event that it is necessary to transfer data outside the EEA this will be done pursuant to necessary safeguards.

8. Security of Personal Data

We take technical and organisational measures to protect all of the Personal Data we hold. Only authorised employees and contractors have access to your Personal Data. Access to the data will be strictly controlled and limited only to those that need to know so that they are able to take steps to protect the University or broader community.

9. Personal Data Retention Periods

We will only retain Personal Data for NHS Test and Trace purposes for 21 days. We may keep Personal Data for longer than this for other purposes linked to employment. In any event, Personal Data will not be held longer than necessary in accordance with the University's Retention Policy.

10. Your Responsibilities

GDPR requires that Personal Data is accurate. It is essential that you let the University know if any information you have provided changes, particularly your contact details. If you fail to update your details, the University cannot take responsibility if any information you require is sent to the wrong address or shared inaccurately with relevant parties.

11. Your Rights

As a data subject you have certain rights:

Right to complain You have the right to lodge a complaint with the Information Commissioner's Office details are provided below;

Right to access personal data: You can find out what information we hold about you by making a subject access request. The request can be made free of charge, by writing to the Data Protection Officer, details of which are below.

Right to Erasure (Right to be Forgotten) You have the right to have the Personal Data we hold about you erased;

Right to object You have the right to object at any time to the processing of your Personal Data;

Right to withdraw Consent Where consent forms are the basis for processing, you have the right to withdraw your consent to the processing at any time;

Right to Data Portability If you request us to we will transmit your Personal Data directly to another organisation;

Right to Rectification You have the right to ask us to rectify inaccurate information held about you without undue delay.

These are not unqualified rights and the University may not be able to act on your request in certain circumstances.

12. Contact Details of the Data Protection Officer

The Data Protection Officer is contactable at Teesside University, Middlesbrough, Tees Valley, TS13BX, UK. Telephone: +44 (0)1642218121, Email: dpo@tees.ac.uk

You may contact our Data Protection Officer directly with any queries relating to Data Protection.

13. Name and Address of the Lead Supervisory Authority

The Lead Supervisory Authority overseeing the Controller is: The Information Commissioner's Office (the 'ICO'), Wycliffe House, Water Lane, Wilmslow, Cheshire, SK95AF, United Kingdom. Tel: +44 (0)3031231113, Email: casework@ico.org.uk. Website: <https://ico.org.uk>.

A comprehensive list of the purposes for which the University processes Personal Data are notified to the Information Commissioner's Office (ICO) and can be viewed on the office of the information Commissioner's Register. To view the University's registration you can use the search form for the Register and enter the University's registration number Z5567143.

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