

Privacy notice template

Policy, Governance and Information

Version: 1.0

Staff & Student COVID-19 data collection Privacy Notice

Our contact details

Solent University, East Park Terrace, SO14 0YN Southampton

For more information, please contact the Information Rights Team at:
information.rights@solent.ac.uk

What type of information we have

In the current situation of the global COVID-19 pandemic, Solent may need to carry out additional processing of your information for the purposes of public health. Public health means services to help people to stay healthy and avoid getting ill.

This notice relates to processing and sharing of information between Solent University and the local Public Health team at Southampton City Council.

The local Public Health team (Southampton) would benefit from getting an early indication on confirmed COVID cases at Solent University, from staff and students. This will enable the Public Health to detect possible clusters and outbreaks within the local area. The staff and student data to be shared is anonymised statistical information. This data includes;

- Staff/Student
- Age (band)
- Gender
- Postcode
- Ethnicity (BAME)
- Health (confirmed COVID cases only)

How we get the information and why do we have it

Under the General Data Protection Regulation (GDPR), the lawful bases we rely on for processing this information are:

- processing is necessary to comply with the **legal obligation** by ensuring health and safety within the University environment (GDPR Article 6(1)(c)).

- For the performance of a task carried out in the **public interest** which includes the provision of a safe learning and teaching environment (GDPR Article 6(1)(e)).
- For the purposes of the **legitimate interests** pursued by the University (GDPR Article 6(1)(f)). Our legitimate reason for processing your data is to assist the local Public Health team based at Southampton City Council with track and trace in relation to the coronavirus public health epidemic.

In addition to sharing personal data, Solent will also share health and ethnicity information (special category data). The lawful basis we rely on for is that the processing is necessary:

- For the purpose of **substantial public interest** Article 9(2)(g)
“processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the University or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;
- For the purpose of **Health or social care** Article 9(2)(h)
“processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3”
- For the purpose of **public interest** in the area of public health (GDPR Article 9(2)(i)).
“Processing is necessary for the reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medical products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy”.

What we do with the information

The data we provide will be anonymous and only be shared where it is essential. The data shared with public health will be based on the confirmed COVID cases only.

Any information processed will be deleted once it is no longer necessary for the purposes for which it was collected.

Your data protection rights

Under data protection law, you have rights including:

- Your **right of access** - You have the right to ask us for copies of your personal information.
- Your **right to rectification** - You have the right to ask us to rectify information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
- Your **right to erasure** - You have the right to ask us to erase your personal information in certain circumstances.

- Your right to **restriction of processing** - You have the right to ask us to restrict the processing of your information in certain circumstances.
- Your right to **object to processing** - You have the right to object to the processing of your personal data in certain circumstances.
- Your right to **data portability** - You have the right to ask that we transfer the information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at information.rights@solent.ac.uk if you wish to make a request.

How to complain

You can also complain to the ICO if you are unhappy with how we have used your data.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow

Cheshire
SK9 5AF
Helpline number: 0303 123 1113