

# COVID-19 Test and Trace Privacy Notice

The UK is currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that organisations take a range of measures to keep everyone safe. In order to assist in the containment of the COVID-19 virus, Public Health England (PHE) requires the University to pass the contact details of any individual who may have encountered cases of Coronavirus (or a suspected case) within any of our facilities to the NHS, for use in the Test and trace scheme: <https://www.gov.uk/guidance/nhs-test-and-trace-how-it-works>

This privacy notice describes how and why we collect and process your personal data to response to the Covid-19 Test and Trace incidents. It also explains your rights under the GDPR.

## 1. Data Controller

The University of Northumbria at Newcastle (“we”, “our”, “us”) is a registered Data Controller (Registration Number: Z7674926) with the Information Commissioners Office. We are committed to processing personal data in accordance with our obligations under the General Data Protection Regulation (GDPR) and the UK Data Protection Act 2018 (DPA2018).

## 2. What personal data will we process?

Contacting people who might have been exposed to the Coronavirus is part of the Governments strategy for containing the spread of the virus. To help achieve this, we may be required to pass your details to PHE/NHS to enable them to contact you should you have used our facilities at the same time as someone who has tested positive for coronavirus. To do this we may pass on the following personal information:

- Your name
- A contact telephone number or email address
- A postal Address
- The date, time and location of your entry into the affected facility

## 3. Where do we get your personal data from?

You will be notified when you are entering a facility on our campus that is subject to Test and Trace conditions.

### *Staff Student and Members of the University Community*

Your contact details are already held in our systems as part of your relationship with us. The date, time and location of your use of a facility is already collected from the swipe card door entry pads located around the campus. If required to do so, we will identify the users of the facility and provide the contact details held by us.

### *Members of the Public and Visitors to the campus*

You will be asked to provide your information upon entry to the any facility subject to Test and Trace conditions.

## 4. The lawful basis for Processing

Public Health England has special permission from the Secretary of State for Health and Social Care to use personally identifiable information without people's consent where this is in the public interest. This includes the use of the information collected by NHS Test and Trace to help protect the public from Coronavirus. We are therefore processing personal information under Article 6 1(e) of the General Data Protection Regulation:

*(e) Public task: the processing is necessary for you to perform a task in the public interest or for your official functions, and the task or function has a clear basis in law.*

We will not process any special category data for this purpose.

## 5. Sharing your Personal Data with the NHS

In the event of a local outbreak of the corona virus, your name and contact details may be provided to the NHS to support Test and Trace work.

NHS Test and Trace will ask for these records only where it is necessary, either because someone who has tested positive for COVID-19 has listed University as a place they visited recently, or because our campus have been identified as the location of a potential local outbreak of COVID-19.

NHS Test and Trace will handle your data according to the highest ethical and security standards and ensure it is used only for the purposes of protecting public health, including minimising the transmission of COVID-19.

## 6. How long do we hold personal data?

Personal data collected solely for the purpose of Test and Trace will be retained for no more than 21 days after which it will be destroyed. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing.

Personal data collected already processed for existing purposes, such as monitoring student attendance will be retained for the standard University retention period as advised to you in the appropriate Privacy Notice.

## 7. Your Rights under GDPR

Under the GDPR, you have [a number of rights](#) in relation to the processing of your personal information, each of which may apply to differing degrees' dependent upon the nature of the processing and the legal basis for it. You have the right to:

- [Be informed as to how we use your data \(via this privacy notice\)](#)
- [Request access \(a copy\) of the personal information that we hold about you.](#)
- [Correct inaccurate or incomplete data](#)
- [Request that we stop sending you direct marketing communications.](#)

In certain circumstances, you may also have the right to:

- [Ask to have certain data 'erased by us.](#)

## COVID-19 Test and Trace Privacy Notice

- [Request that we restrict certain processing of your personal data.](#)
- [Request that we provide any data you submitted to us electronically be returned to you or passed to a third party as a data file.](#)
- [Object to certain processing of your personal data by us](#)

In order to exercise any of the above rights, please contact the Data Protection Officer. For more information about any of the above please see the [GDPR pages of our website.](#)

### **8. Data Protection Officer**

The Data Protection Officer (DPO) for Northumbria University can be contacted via email at [dp.officer@northumbria.ac.uk](mailto:dp.officer@northumbria.ac.uk) or you can call +44 (0)191 243 7357

### **9. Lodging a Complaint with the Information Commissioners Office (ICO)**

If you are dissatisfied with our processing of your data, or a response to a complaint you have made to us about it, you have the right to complain to the ICO.

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, and Telephone: 0303 123 1113 (local rate) or 01625 545 745 Email: [casework@ico.org.uk](mailto:casework@ico.org.uk)

For more information see [Information Commissioner's web site](#)