

COVID-19 Privacy Notice

About us

This Privacy Notice explains the nature of the personal information that the University of Reading and Henley Business School processes for the purposes of managing our response to COVID-19.

The University of Reading and Henley Business School (**We** or **Us**) are data controller in respect of the information that We process about you. Our contact details are The University of Reading, Information Management and Policy Services, Room 2.22, Whiteknights House, Shinfield Road, Whiteknights, Reading RG6 6DT.

United Kingdom. Tel: +44 (0) 118 378 8981.

Your privacy is important to Us, so if there is anything in this privacy notice that is unclear or you do not understand, please contact Our Data Protection Officer at: imps@reading.ac.uk.

This notice explains what personal information We collect, hold, and share in support the purposes of

- Contact Tracing, and
- University outbreak response and control measures

This notice also informs you of your rights in respect of the data We hold about you and where you can go for more information.

Data We collect about you

To undertake necessary measures to control the spread of COVID-19 We need to collect, record, store, use, share, retain and destroy (this is known as 'processing') the personal data of our staff, students and visitors.

We will process the following personal data, in the interests of the protection of public health and to comply with our legal obligations for the purposes of NHS Test and Trace reporting, for all venues listed within current government guidelines. These can be found [here](#), and as these may be subject to change, Please note this includes our Library spaces.

We would encourage you to visit these pages for the latest information.

For these venues We are required to collect the following personal data:

Staff

- the names of staff who work at the premises
- a contact phone number for each member of staff
- the dates and times that staff are at work

Customers (to include staff and students) and visitors

- the name of the customer or visitor. If there is more than one person, We can record the name of the 'lead member' of the group and the number of people in the group

- a contact phone number for each customer or visitor, or for the lead member of a group of people
- date of visit, arrival time and, where possible, departure time

University Venues that are collecting this information are required to display notices to let you know your data is being collected, or used, for the purposes of Test and Trace. We will collect limited data directly from you, and/or use data We already hold, such as that registered to your Campus Card or taken via bookings, to ensure We have all the information required above, and to minimise inconvenience to you.

The University have a legal obligation to collect this data. We may restrict entry to our venues if you refuse to supply data when requested. If you have any concerns regarding uses of your data for these purposes, you can contact our Data Protection team at imps@reading.ac.uk.

Independent of NHS Test and Trace We additionally collect information, and use information We already hold for other University purposes, including:

- working/study locations
- attendance lists for teaching spaces
- University student accommodation residency details
- details of booked study spaces
- details of any travel connected with University business
- details of any non-compliance with University outbreak control measures, including Government mandated requirements
- details of any placement activity
- details of attendance at societies and events

This data is used for the purposes of:

- identifying those that may be at risk from COVID-19 and to enable Us to take necessary steps to alert those individuals
- Identifying high risk areas and monitoring for clusters, outbreaks or patterns in infection locations, in order that We can take any steps possible to reduce further risk
- ensuring We can meet our obligations in respect of safeguarding the health and safety of those on our campuses
- monitoring compliance with University rules, safety instructions and infection and outbreak control measures, including Government mandated requirements, and administering disciplinary procedures
- Assisting with University outbreak control measures.

We may also receive data, including your name, contact details, ID numbers, visited location details and positive test outcome from DHSC, agencies involved in contact tracing, University accommodation providers, Reading University Students Union and law enforcement agencies to support the above purposes.

Who we share your data with

The Department of Health and Social Care, Public Health England, and Local Authorities

To support NHS Test and Trace in England, where required, We will share this information with the Department of Health and Social Care (DHSC). The purpose of DHSC's processing will be to facilitate NHS Test and Trace contact tracing and to assist Us with outbreak control measures.

NHS Test and Trace is a key part of the country's ongoing COVID-19 response and is run by DHSC. It includes dedicated contact-tracing staff working at national level under the supervision of Public Health England (PHE) and local public health experts who manage more complex cases. Local public health experts include both PHE health protection teams and local authority public health staff.

Sharing of data between Us and the DHSC, and those agencies listed above, may be necessary if an individual tests positive for coronavirus. We will work with these agencies to contact individuals that may be at risk of exposure to the virus and provide advice. This contact may come from NHS Test and Trace or the University.

We will only share data with DHSC if it is deemed necessary, and if We are satisfied that We have a lawful basis for this sharing.

At the point the DHSC receive your personal data from Us, DHSC will become the data controller and responsible for your data. The privacy notice of the DHSC will then apply and this can be found [here](#). The DHSC privacy notice explains how the DHSC will process your personal data including the limited purposes it will be used for.

Please note: Public Health England will be changing to The National Institute for Health Protection (NIHP) from 1st April 2021.

Reading University Students Union (RUSU)

RUSU are independently responsible for the data they process in connection with RUSU activities, venues and societies and you should refer to their own Privacy Notices for more information on how RUSU process your data.

Where it is deemed necessary, for the purposes of contact tracing and University outbreak response and control measures We will share data with RUSU.

University Accommodation providers

Where it is deemed necessary, for the purposes of contact tracing and University outbreak response and control measures We will share data with the University Partnerships Programme (UPP) and Unite.

Placement Providers

Where it is deemed necessary, for the purposes of contact tracing and University outbreak response and control measures We will share data with placement providers, for example, if you are undertaking teaching placements within a school.

Law enforcement agencies

Where it is deemed necessary, for the purposes of reporting non-compliance with Government mandated legal requirements We will share data with the Police and law enforcement agencies.

Providers of our services working on behalf of the University

We also use third party providers to deliver our services, such as externally hosted software providers that We use to manage bookings. These providers act only on the instructions of the University and are not permitted to make any further uses of your data and must keep your data secure.

Our lawful basis for uses of your data

Under data protection laws We must have a legitimate and lawful basis for processing your personal data. There are several lawful grounds within data protection law, here the General Data Protection Regulation (GDPR) and Data Protection Act 2018 (DPA), that apply to the different data that We are processing for identifying contacts and University outbreak response and control purposes. These are explained below:

GDPR Article 6(1)(e): processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

GDPR Article 6(1)(c): processing is necessary for compliance with a legal obligation to which the controller is subject

GDPR Article 9(2)(i): the processing is necessary for reasons of public interest in the area of public health

DPA 2018 - Schedule 1, Part 1, s.3: the processing is necessary for the protection of public health

DPA 2018 - Schedule 1, Part 1, (2)(2)(f): the processing is necessary for health or social care purposes

DPA 2018 - Schedule 1, Part 2 (6): the processing is necessary for statutory or government purposes

DPA 2018 - Schedule 1, Part 2 (7): the processing is necessary for the administration of justice

How We protect your data

Your personal information will be stored securely within the University and our staff are trained in the secure handling of personal information. All those involved in collecting and using data for purposes connected to COVID-19 will be responsible for ensuring the security and retention of your data. Limited designated University staff will be responsible for the secure transfer of your information between internal teams and departments and to any parties that We share data with, where required.

Wherever the purposes can be met without the use of personally identifying data, anonymised data will be used. Where the processing of personal data is strictly necessary, that data will be limited to the minimum required to meet those purposes.

Processing of personal data for the purposes will be undertaken under the supervision and on advice of the University Data Protection Officer.

Retention of your data

Information collected *solely* for the purposes of NHS Test and Trace is kept for a minimum of 21 days and not retained for longer than government guidelines specify. Where We use any data held for other University purposes (for example, for Campus Card administration, library access, attendance monitoring, disciplinary procedures, estates management, or event bookings) this will continue to be held in line with existing retention periods and in accordance with data protection laws.

If your data is requested by DHSC agencies and passed to them, it will then be subject to retention periods as stated with the DHSC privacy notice. Any enquiries regarding data held by the DHSC should be routed to DHSC's data protection officer who can be contacted at data_protection@dhsc.gov.uk.

Your rights

Under data protection law you have the right to:

- Withdraw your consent where that is the legal basis of our processing
- Access your personal data that We process
- Rectify inaccuracies in personal data that We hold about you
- Be erased, that is your details to be removed from systems that We use to process your personal data
- Restrict the processing in certain ways
- Obtain a copy of your data in a commonly used electronic form; and
- Object to certain processing of your personal data by Us

Please see the ICO website for further information on the above rights:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/individual-rights/>

If you would like to exercise your rights, or have any concerns regarding how We have handled your personal information please contact our Data Protection Office at imps@reading.ac.uk

Some rights are dependent on the lawful basis for processing your information. If We have legitimate grounds to not carry out your wishes, these will be explained to you in response to your request.

You also have the right to complain to the Information Commissioner's Office.

Questions about this notice

If there is anything in this notice that you are unclear about, please contact our Data Protection Officer, on the contact details below, who shall be happy to answer any queries you may have concerning this privacy notice or the way in which We process your personal data.

By mail: The University of Reading, Information Management and Policy Services, Room 2.22, Whiteknights House, Shinfield Road, Whiteknights, Reading RG6 6DT

By email: imps@reading.ac.uk

By phone: United Kingdom. Tel: +44 (0) 118 378 8981.

Complaints can be referred to the Information Commissioner's Office, the independent body who oversee Data Protection compliance in the UK.

Web: <https://ico.org.uk/make-a-complaint/>

More information on Contact and Trace and Data Protection can also be found here:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/>

Changes to this notice

We keep our privacy notice under regular review to ensure best practice and compliance with the law. This privacy notice was last updated on 16/10/20.

We may change this privacy notice from time to time. If We make significant changes in the way We treat your personal information We will make this clear on our website and may seek to notify you directly.

How to contact us

If you have any questions about this notice, our University Data Protection Officer can be contacted at:

IMPS

Telephone: United Kingdom. Tel: +44 (0) 118 378 8981.

Email: imps@reading.ac.uk