

## **COVID-19 – ASYMPTOMATIC TESTING PRIVACY NOTICE**

This notice supplements the University's Privacy Notices and explains what additional personal data the University may collect during the COVID-19 pandemic and how this personal data will be processed.

### **Changes to this privacy notice**

It is important that you check this privacy notice for updates as we may need to update it as circumstances change. If we make changes that we consider to be important, we will let you know by contacting you using the contact details you have provided to us.

### **ASYMPTOMATIC TESTING**

This notice applies to all students who volunteer to have a COVID-19 test conducted at the University as part of the NHS Asymptomatic Testing Programme. The University is committed to protecting the privacy and security of your personal information. The processing of personal data has been minimised as far as possible and will only be kept for as long as is necessary.

The University will be using an online booking tool so you can book your test appointments. You will need to provide some personal information to book your appointment. The information you give in the form will be used to schedule your test appointment and to manage arrangements at the testing site.

### **What we may need from you**

We may need to request specific information from you to help us confirm your identity at the test centre. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.

### **If you fail to provide personal information**

If you fail to provide certain information when requested, we will not be able to conduct the test and associated actions.

### **Test Registration**

The University won't see any personal information relating to your test registration or results. Further information can be found in the Government's Coronavirus (COVID-19) testing privacy information [here](#).

On arrival at your test appointment, you will be provided with a test kit and card and asked to register. The University will not have access to any of your registration data. You will be notified of your test result via SMS or to the email you provide when you register. The University will not see your test results/notification. Your personal information relating to test registration and results is processed by NHS Test and Trace. Information about how they will use your data can be found [here](#).

Any information after the COVID-19 test that students share with academic, administrative and student support staff and that staff share with line managers will be processed and retained in accordance with the University's standard data processes.

- If you need University advice on COVID-19 please see:  
<https://www.bolton.ac.uk/coronavirus/>
- If you need Government advice on COVID-19 please see:  
<https://www.gov.uk/coronavirus>
- If you need medical advice on COVID-19 please see:  
<https://www.nhs.uk/conditions/coronavirus-covid-19/>

### **How information will be used**

- To reduce the spread of COVID-19 and infection control.
- Contain outbreaks early.
- Help identify and contact individuals who may have been exposed to the virus.
- To provide support / assistance to you as appropriate.

The University strongly encourages that you cooperate with the coronavirus (COVID-19) asymptomatic testing process for the purposes defined in this notice. Cooperation means better detection of people that are asymptomatic and that swift action to minimise transmission of the virus is taken. However, the scheme is voluntary and you are under no obligation to participate and provide your information.

### **How information will be used by the University**

The information you provide will be used to support the testing process, as follows:

- Booking an appointment
- Confirming the appointment to the test site
- Performing security and ID verification at the test site
- Administering the test
- Undertaking quality assurance of the testing process
- Analysis to support University decisions to improve and assist with how the University will respond to the pandemic:
  - Day-to-day use (eg. whether someone attended their appointment)
  - To inform improvements to the testing process (eg. manage capacity)

### **How information will be used by NHS Test and Trace**

When you register for a coronavirus test the data will be collected and processed by NHS Test and Trace. A copy of your result will be sent to your GP. If you have tested positive, a notification will be sent to Public Health England (in England), Public Health Wales (in Wales), Health Protection Scotland (in Scotland), or the Public Health Agency (in Northern Ireland).

The NHS Test and Trace takes the protection of your privacy very seriously. To find out how your personal data will be used when you register for a coronavirus test read the Government's coronavirus [privacy notices](https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information) available at: <https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information> and <https://www.gov.uk/help/privacy-notice>

### **Your right to access and correct your personal information**

The University respects your right to access and control your information, we will respond to requests for information and, where applicable, will correct, amend or delete your personal information.

Under data protection laws you have the following rights:

- request access to your personal information;
- rectify inaccuracies in your personal data;

- be forgotten - that is your details to be removed from the systems that we use to process your personal data in certain situations;
- restrict the processing of personal data in certain situations;
- object to the processing of personal data in certain situations;
- object to automated decision making and profiling.

### Right to withdraw consent

In the limited circumstances where you may have provided your consent to the collection, processing and transfer of your personal information for a specific purpose, you have the right to withdraw your consent for that specific processing at any time. To withdraw your consent, please contact the University Data Protection Officer. Once we have received notification that you have withdrawn your consent, we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legal basis for doing so.

### Questions and complaints about how your data is used

If you have any queries or concerns about the use of your personal data, please email the University Data Protection Officer at [dpo@bolton.ac.uk](mailto:dpo@bolton.ac.uk)

Or in writing: Data Protection Officer  
The University of Bolton  
Deane Road  
Bolton  
BL3 5AB

You also have a right to complain to the Information Commissioner's Office about the way in which we process your personal data at:

Information Commissioner's Office  
Wycliffe House Water Lane  
Wilmslow  
Cheshire  
SK9 5AF  
[www.ico.org.uk](http://www.ico.org.uk)

Purpose for processing	This processing is considered necessary to enable compliance with legal obligations set out in statutory health and safety law, common law, the Public Health (Control of Disease Act) 1984, and the Coronavirus Act 2020, and is required to protect the welfare and wellbeing of individuals.
Legal basis for processing	<ol style="list-style-type: none"> <li>1. <b>Consent:</b> Article 6(1)(a), e.g. on registration you only need to provide certain data if you agree to that.</li> <li>2. <b>Public Task:</b> Article 6(1)(e), performance of a task in the public interest/exercise of official duty vested in the University.</li> </ol> <p>When we collect data about your health, we also rely on the following legal basis:</p> <ol style="list-style-type: none"> <li>3. GDPR Article 9(2)(h) provision of preventative or occupational medicine, health or social care or treatment, or the management of health or social care systems</li> <li>4. GDPR Article 9(2)(i) public health</li> <li>5. Data Protection Act 2018 – Schedule 1, Part 1, (2)(2)(f) – health and social care purposes</li> <li>6. Data Protection Act 2018 – Schedule 1, Part 1, (3)(a) – necessary for reasons of public interest in public health</li> </ol>

Whose information is being collected	students
What information is collected by the University	<p>If you are a <b>student</b>:</p> <ul style="list-style-type: none"> <li>• Name.</li> <li>• Student ID number.</li> <li>• Postal and email address.</li> <li>• Contact phone number.</li> <li>• Date of birth.</li> <li>• date of visit, arrival time and, where possible, departure time.</li> <li>• Information to confirm identity.</li> </ul> <p>If you have provided consent, we may also collect 'special category' information:</p> <ul style="list-style-type: none"> <li>• information about your health</li> </ul>
How is the information being collected by the University	We collect the personal information about you via the coronavirus test appointment booking system and/or at the coronavirus test centre
How secure is the information collected by the University	<p>We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees who have a business need to know. They will only process your personal information on our instructions and they are subject to a duty of confidentiality.</p> <p>We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.</p> <p>All personal data is kept securely on University server in line with the University Information Security Policies available at: <a href="https://www.bolton.ac.uk/about/governance/documents/#dataprotection">https://www.bolton.ac.uk/about/governance/documents/#dataprotection</a></p>
How long is the booking information kept for by the University	<p>We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements.. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements. In this case, we expect to retain your personal information for 21 days.</p> <p>Please see the University Records Retention Schedule available at: <a href="https://www.bolton.ac.uk/about/governance/documents/#dataprotection">https://www.bolton.ac.uk/about/governance/documents/#dataprotection</a></p>
Which third parties will process my information	Local and National Government Test and Trace Services
How secure is the information collected by the Government Test and Trace Services	<p>Please see the Government's coronavirus privacy notices available at: <a href="https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information">https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information</a></p> <p><a href="https://www.gov.uk/help/privacy-notice">https://www.gov.uk/help/privacy-notice</a></p>

How long is the information kept for by the Government Test and Trace Services

For English residents, their data will be stored in line with the [Records Management Code of Practice for Health & Social Care 2016](#). This means that they will keep your information for up to 8 years before they dispose of it.

Please see the Government's coronavirus privacy notices available at:

<https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information>

<https://www.gov.uk/help/privacy-notice>

For more information on data protection:

<https://www.bolton.ac.uk/about/governance/documents/#dataprotection>

Updated: 23 November 2020 (version 1)