

## **COVID-19 –PRIVACY NOTICE ADDENDUM**

This notice supplements the University's Privacy Notices and explains what additional personal data the University will 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.

### **Temperature Checks**

As part of a package of health and safety measures digital temperature checks will be carried out in the entrance to buildings and at various locations across the University on all staff, students and visitors who wish to enter the campus.

The processing of personal data has been minimised as far as possible. Personal data will not be recorded on any of the devices used to check temperatures, the scanners are low resolution to ensure that only minimal data is processed. Images/data recorded by the temperature scanners are not retained by the University. Such images/data are not collected, recorded, stored, used or disclosed for any purpose aside from determining whether an individual should be permitted to enter University premises.

Any information after temperature checks 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.

### **NHS Test and Trace**

The University will be collecting information about the times and dates of your attendance on campus to support the NHS Test and Trace programme. This will include attendance of teaching sessions, access to buildings, and the use of other campus facilities. This data will be retained for **21 days** in line with NHS requirements. Data normally collected for other purposes may be re-used for contact tracing purposes. Where possible you will be advised in advance when this is the case. This data will be retained in accordance with standard University data processes.

Where we are directed by the NHS to trace those that have been in contact with someone who has COVID-19, we are able to process data concerning health as this is in the substantial public interest for public health purposes.

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

Your information will be used to support NHS Test and Trace purposes, as follows:

- 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.

The University strongly encourages that you to cooperate with NHS Test and Trace for the purposes defined in this notice. Cooperation means better detection of people who have recently come into close contact with a new COVID-19 case and that swift action to minimise

transmission of the virus is taken. The Health Secretary has described cooperation with Test and Trace as a 'civic duty'. However, the scheme is voluntary and you are under no obligation to provide your information. You can contact us to ask that your information is not disclosed to NHS Test and Trace.

If you do not want us to collect your data where Test and Trace is in operation via entry recording systems, please make yourself known to a member of staff prior to your entry. Our staff will assist to facilitate your entry without your information being recorded. To request that your information is not disclosed to NHS Test and Trace please contact [dpo@bolton.ac.uk](mailto:dpo@bolton.ac.uk) or if you are a student [studentadvisors@bolton.ac.uk](mailto:studentadvisors@bolton.ac.uk).

### **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.

### **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)

Further advice and guidance from the Information Commissioner's Office on contact tracing can be found on their website at:

<https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/contact-tracing-protecting-customer-and-visitor-details/>

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	<p>1. <b>Public Task:</b> Article 6(1)(e), performance of a task in the public interest/exercise of official duty vested in the University.</p> <p>When we collect data about your health, we also rely on the following legal basis:</p> <p>2. 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</p> <p>3. GDPR Article 9(2)(i) public health</p> <p>4. Data Protection Act 2018 – Schedule 1, Part 1, (2)(2)(f) – health and social care purposes</p> <p>5. Data Protection Act 2018 – Schedule 1, Part 1, (3)(a) – necessary for reasons of public interest in public health</p>
Whose information is being collected	students, employees, customers and visitors.
What information is collected	<p>If you are a <b>staff member</b>:</p> <ul style="list-style-type: none"> <li>names of staff who work at the premises.</li> <li>contact phone number for each member of staff.</li> <li>dates and times that staff are at work.</li> </ul> <p>If you are a <b>student, customer or visitor</b>:</p> <ul style="list-style-type: none"> <li>the name of the student, customer or visitor. If there is more than one person we will try to record everyone's details, but we may only record the name of the 'lead member' of the group and the number of people in the group if this is not possible.</li> <li>contact phone number for each customer or visitor, or for the lead member of a group of people.</li> <li>date of visit, arrival time and, where possible, departure time.</li> <li>if a customer or visitor will interact with only one member of staff (e.g. if they have a scheduled appointment with an advisor), the name of the assigned staff member will be recorded alongside the name of the customer or visitor.</li> </ul>
How is the information being collected	<p>For students - the University will maintain a record of who you have been in contact with as part of a study group based on information in our timetabling and attendance systems.</p> <p>For students residing in houses of multiple occupancy or externally provided halls of residence, where possible, we will determine your living group based on address information in our student records.</p> <p>There will be posters and other notifications displayed in each venue to inform you that Test and Trace is in place.</p>
Who we share personal data with	NHS Test and Trace Programme
How secure is the information	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>

How long is the information kept for

Government advice is clear that temporary records collected for test and trace purposes should be held for **21 days**. 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. After 21 days, information held for Test and Trace purposes will be securely disposed of or deleted.

Records which are made and kept for other business purposes will not be disposed of after 21 days and will be retained in line with the University Records Retention Schedule. The requirement to dispose of the data relates to a record that is created solely for the purpose of NHS Test and Trace.

Please see the University Records Retention Schedule available at: <https://www.bolton.ac.uk/about/governance/documents/#dataprotection>

For more information on data protection:

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