

Covid-19 Student Reporting Privacy Notice

Purpose of this notice

This notice explains how we will collect and use your personal data in response to the recent outbreak of Coronavirus (Covid-19), which is above and beyond what would ordinarily be collected from you in the interests of public health.

We are the data controller for the personal information that we process about you. Throughout this Notice, "University" "we", "our" and "us" refers to the University of Northampton. "You" and "your" refers to Students who believe they have symptoms or have had a positive test for Covid-19 via the online forms or making a formal report of to the university of their health status in relation to Covid-19.

Personal Information provided to us by you will be used to provide to you;

- a. Information on self-isolation (including links to relevant government information).
- b. Information on the requirement for others to self-isolate if in the same household (including links to relevant government information).
- c. Information on how to ensure food and medicines can continue to be sourced during self-isolation (a buddy system).
- d. Information on applying for mitigating circumstances where relevant.
- e. Information on testing options, including what to do if the test is negative or positive.
- f. Information on any national test and trace programmes.
- g. For a student on a placement/WBL programme – details for ensuring all forms related to Covid-19 in the context of that programme are supplied to and completed by the student
- h. Anonymised information to other students/academics that maybe be required to self-isolate as a direct result of you reporting symptoms or a positive test result to the university.

Who will have access to the data provided?

Such information will be limited to what is proportionate and necessary, considering the latest guidance issued by the Government and health professionals, in order to manage and contain the virus.

Anonymised information may be provided to the Student Information Desk/Student Services, Facilities and Estates and Residential Life for the purposes of notifying other students to self-isolate, no personally identifying information will be shared.

In the event you become seriously ill, we may request your explicit consent to share personal data with medical professionals, the student information desk, residential life, placements/WBL programme providers or academics. To ensure others you may have come in contact with are notified to self-isolate.

In the event of a health emergency which poses a potential risk to life, where your explicit consent cannot be obtained, the university will provide appropriate personal data to the emergency services to prevent serious harm to you.

See “What is our lawful basis for processing your personal data?” below for full details of the basis the information described in this section is lawfully processed.

What personal data is being collected?

- a. Student Name
- b. Student ID
- c. Date of positive test
- d. Date of first symptoms
- e. Address (this to assist with any public health requirements we might have in the event of an outbreak)
- f. Whether they are currently on a placement/WBL opportunity

What is our lawful basis for processing your personal data?

The Data Protection Act 2018 and the General Data Protection Regulation (GDPR) EU 2016/679 requires specific conditions to be met to ensure that the processing of personal data is lawful. These relevant conditions are below:

- Article 6(1)(d) – is necessary in order to protect the vital interests of the data subject or another natural person.

Recital 46 adds that “some processing may serve both important grounds of public interest and the vital interests of the data subject as for instance when processing is necessary for humanitarian purposes, including for monitoring epidemics and their spread”.

- Article 6(1)(e) – 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.

The processing of special categories of personal data, which includes data concerning a person’s health, are prohibited unless specific further conditions can be met. These further relevant conditions are below:

- Article 9(2)(i) – is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health.
- Article 9(2)(g)- processing is necessary for reasons of substantial public interest, Schedule 1, Part 2(6) – is necessary for reasons of substantial public interest and for the purpose of a function conferred on a person by an enactment or rule of law; eg [Health Protection \(Coronavirus\) Regulations 2020](#) and [Coronavirus Act 2020](#)
- Sharing of personal data will rely on Article 9(2)(a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes
- In the event of a health emergency which poses a potential risk to life, where your explicit consent cannot be obtained, the university will provide appropriate personal data to the emergency services to prevent serious harm to you. Article 9(2)(c) “processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent” will be relied on.

Am I required to provide my personal data?

Whilst the provision of data cannot be mandated, you are strongly advised that it is in the best interests of all to provide this information to the University so we are able to take relevant steps to keep you and others safe.

You are only being asked to provide data if you are displaying symptoms, or if you have tested positive for Covid-19. If you are self-isolating or have been asked to self-isolate but do not have symptoms, you are not required to provide this data.

How long will my personal data be retained?

We will only keep your information for as long as it is necessary, considering Government advice and the on-going risk presented by Coronavirus. The university will continue to review government guidance, it is reasonable to expect data to be retained until such time as the infection rate falls to zero. Should the government prescribe a fixed retention period in the future, this will be documented here. When the information is no longer needed for this purpose, it will be securely deleted.

Health information provided by you in relation to this outbreak of Coronavirus will not be used for any other purpose. Where Covid-19 related information is to be used for general reporting or statistics, steps will be taken to anonymise the data and generalise numbers used.

Your Data Rights

Under GDPR you have the right to:

- Be informed – right to know that we are processing your personal data and what we are doing with it (e.g. detailed in privacy notices);
- Access – right to see personal information which we hold about you;
- Rectification – right to ask that we rectify inaccuracies in the personal data which we hold about you;
- Erasure – right to request the deletion of your personal data;
- Restrict – right to restrict the processing of your personal data;
- Portability – right to request a copy of your data in machine readable format;
- Object – right to object to the processing of your personal data at any time;
- Challenge – right to challenge automated decisions.

Please note that the above rights are not absolute, and we may be entitled to refuse requests where exceptions apply. Further Information If you have any concerns with the way in which we process your personal data or have a query with regards to this Privacy Notice, please contact our Data Protection Officer (Phil Oakman) at Recordsmanager@northampton.ac.uk.