

## COVID-19 Pandemic – Data Processing

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.

We may need to update this notice as circumstances change and will advise students and staff of any changes via our standard communications channels.

### Temperature Checks

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 as part of a package of health and safety measures.

The data protection lawful bases for processing this personal data are to meet legal obligations to those on campus and to meet contractual obligations to staff. This processing is considered necessary to enable compliance with legal obligations set out in statutory health and safety law and common law.

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; no other records will be made at the temperature check.

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 processes.

### Contact Tracing/Test and Trace

The University will be collecting information about the times and dates of your attendance on campus to support the National Institute for Health Protection's contact tracing programme (NHS Test and Trace) using the QR code app and other methods. This will include attendance of teaching sessions, access to buildings, and the use of other campus facilities.

We will only look at the personal data if there has been a report of a positive case of coronavirus in a location on campus. We will only use your personal data to contact you in case you have been in proximity with some-one who has tested positive for coronavirus. We will not share this personal data with third parties.

This data will be retained for 21 days in line with National Institute for Health Protection requirements.

Data normally collected for other purposes (e.g. library and gym turnstiles, nursery attendance registers) 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 retention policies.

The data protection lawful basis for collecting this data is that this is a legal requirement. Where we are directed by the National Institute for Health Protection to trace those that have been in contact with someone who has coronavirus, we are able to process data concerning health as this is in the substantial public interest for public health purposes.

Data may be shared with the Students' Union for contact tracing with respect to student societies.

Where visitors to the University use the QR codes and app, we will only store your information for 21 days and will disable any cookies at this point. If you return to campus after this time you will need to re-register when you use the QR app

### **Asymptomatic Testing**

As part of Department of Health and Social Care's wider efforts to combat the SARS-CoV2-19 pandemic, the DHSC has asked universities to set up an Asymptomatic Testing Site (ATS) for the mass testing of students for COVID-19 using lateral flow technology. The University has entered into an agreement with the DHSC, which will support the University's running of a Covid-19 testing facility at the University.

Initially, COVID-19 tests are available for students intending to travel home during Student Travel Window (3 – 9 December 2020).

By booking an appointment you are consenting to the University collecting data in relation to your test. The University will process this data to manage test appointments and will retain as evidence of your consent. The University will not be able to link test results to individuals and the DHSC and NHS will not share test registration data and results with the University.

Appointments data will be held on the University's CRM system where data is retained for 7 years.

For more information about how your personal data will be processed by the DHSC and the NHS please see their [privacy notices](#).

### **Reporting Positive COVID-19 Tests**

Where a student self-reports a positive COVID-19 test or a report is made on behalf of a student, the data will be used to record absence and provide appropriate student support where this is possible. The lawful basis for this is that this is necessary for our contract with you. The data will also be used to initiate contact tracing (see further information above). This data will be treated as confidential and only shared with staff on a need to know basis.

It is envisaged that this data will be retained for the duration of your course, but the University will keep under review national guidelines for the retention of this data and changing circumstances and will update this privacy notice and information about related processes accordingly.

Post codes of students resident in Sheffield who test positive for coronavirus are reported to Sheffield City Council which has a public health function for the local area. Data may be shared with Public Health England where required by law for public health purposes.

### **Wellbeing Information**

We will be asking students if they fall into the UK definition of a clinically vulnerable person as we would like to provide advice and may be able to make reasonable adjustments if this is necessary. The data protection lawful basis for this processing is consent. You have the option not to share this information with us, but if you choose not to share this information this may limit the support that we can provide. Only a very limited group of staff will have access to the detail that you provide, but we may provide lists of students requiring additional support to staff responsible for providing student services.

We may also ask staff to provide this information as we return to working on campus. This will be to fulfil our contractual obligations to staff and to plan and provide our services. If this information is requested, the data protection lawful basis for this processing will be that it is necessary to fulfil our contracts with staff. The condition of processing for any special category personal data is to fulfil our employment law obligations. This information will be retained in accordance with standard University retention policies.

In an emergency we may need to share limited personal data, including information about your wellbeing and health to ensure your safety and wellbeing. The data protection lawful basis for this processing is that it is in your vital interests or the vital interests of another individual.

### **Emergency Supplies/Food Deliveries**

A small amount of personal data (name, delivery address, contact details, supplies required) will be shared with our suppliers to enable the delivery of emergency supplies to students. These deliveries are made at your request and with your consent. The University conducts checks on suppliers and enters into legal agreements with suppliers to ensure that personal data is processed lawfully.

### **Student Enrolment - Identification Documents**

We are required to check the identification of all students for immigration purposes and to support the administration of student loan payments from Student Finance England. This year students are required to upload copies of ID to our student system as we are unable to check hard copy documents in person.

Copies of ID documents will be stored on the University's student record system to ensure that we are able to deal with all required checks and respond to any queries from Student Finance England and immigration authorities.

The data protection basis for processing this data to support the administration of student loan payments is to fulfil our contract with you. For these purposes copies of documents will be stored for a maximum of 6 months to ensure that all checks and any queries from Student Finance England have been dealt with. The copies of ID documents will then be deleted.

The data protection lawful basis for processing this data for immigration procedures is that this is a legal requirement. For these purposes copies of your ID documents will be retained in accordance with standard University retention policies.

### **Webinars/Videoconferencing/Recorded Meetings and Teaching**

In order to provide teaching, assessment, administrative and student support services off-campus/remotely we will be using videoconferencing/webinar platforms, lecture recording, and other virtual teaching methods.

Where these activities support our teaching and assessment our data protection lawful basis is that this is part of our public task as a university. For student support and wellbeing processing the lawful basis is that this is necessary to fulfil our contract with students. For staff, this processing is generally necessary for the performance of your employment contract. Recordings of staff events to

be shared on the staff intranet are made in the legitimate interests of the University with the option not to attend. For other non-essential recordings staff consent will be required.

Where teaching and learning activities are recorded, you will be informed of this and recordings will only be accessible to members of your cohort. Invigilated assessments will be shared with academic

and administrative staff for assessment purposes. This data will generally be retained for the current academic year or assessment cycle.

Recordings of staff meetings and training sessions may be shared with team members and other colleagues. Recordings of some staff events may be shared via the staff intranet. Participants will be advised if recordings will be shared more widely or will be publicly accessible.

[More information about your data protection rights and how to contact the University's Data Protection Officer](#)