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). 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 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.
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.

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.

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.

The University carries out checks on its suppliers and puts in place contracts with third parties which process personal data on our behalf. In some cases this involves the transfer of data outside the UK and the European Economic Area (EEA). Where this is necessary, we are required to put in place safeguards to ensure your data protection rights.

If you ask us to use a less secure platform to access student support services remotely, we will explain the risks, help you to minimise these as far as possible, and will use your preferred platform at your request and with your consent.

Further Information

For more information about the University’s response to Covid-19, please see Sheffield Hallam University - Covid-19 information

For more information about how the University processes personal data, including information about your data protection rights and how to contact the Data Protection Officer, please see: Sheffield Hallam University - Privacy and GDPR