



Nottingham Trent
University

COVID-19 Privacy Notice

Date: 27 August 2021

The global pandemic has meant that NTU may need to carry out additional processing of information about you for the purposes of public health and to safeguard the NTU community. This Privacy Notice describes how your personal data will be used as part of the University's COVID-19 Response Programme to help prevent the spread of COVID-19. It should be read in addition to other relevant [Privacy Notices](#).

The safety of our students, staff and community is paramount to NTU – please see our [website](#) for further information. In addition, NTU expects its students and employees to comply with their individual responsibilities under the NHS Test and Trace process – further information is available on the [GOV.UK](#) website.

1. Introduction

Nottingham Trent University (NTU) is the Data Controller for personal data in accordance with the General Data Protection Regulation 2016/679 (GDPR) and the Data Protection Act 2018. NTU is registered with the Information Commissioner's Office under registration number Z7109967. The Data Protection Officer can be contacted through DPO@ntu.ac.uk.

2. Why we collect your data

We have a duty of care to our staff, student and visitors. In addition we are required to assist the Local Authority, NHS Test and Trace Service and/or public health authorities where necessary to help minimise and manage the transmission of COVID-19.

3. What data is collected

NTU already collects data about you for a number of purposes which are detailed in other privacy notices (students/employee privacy notice).

When you book a COVID-19 Lateral Flow Test at NTU, you will be asked to provide certain personal data about you: your name, email address, ID number. Please see NTU's [COVID-19 Booking Form Privacy Notice](#). You will receive your test result from the NHS Test and Trace service via SMS or email – please read the [NHS Privacy Notice](#).

If you collect or are provided with a Home Testing Kit from NTU, to enable you to take your test at home, you will be asked to provide certain personal data about you: your name and a contact telephone number which will be logged against the date you collected/were provided with the Home Test Kit and the Home Test Kit lot number. For Home Testing Kit collection, NTU acts as a Data Processor on behalf of the NHS – please read the [NHS Home Test Kit Privacy Notice](#).

When you complete the relevant NTU Coronavirus Form (staff or students) you will be asked to provide certain personal data about you which will include: name, email address, student ID number, the reason for you completing the form (i.e. self-isolation, symptoms, positive COVID-19 test (and type of test)), the start date of self-isolation and/or test date, and for students whether you are resident in halls of residence as well as the requirement for support and assistance during self-isolation. This data may also be linked to information already held by NTU such as: contact details (address, postcode and telephone number), or

attendance records (with regard to students, where necessary) as part of the COVID-19 Response Programme and NTU's Local Outbreak Response Plan.

Additional data may be collected, such as contact details when you use certain facilities such as campus cafés in accordance with specific government guidance will also be recorded.

4. When and how do we collect your data

The data will be collected through completion of the relevant NTU Coronavirus Form (staff or students) where you report COVID-19 symptoms, a positive COVID-19 test, through booking a test or collection of Home Test Kits, when you are provided with a Home Test Kit by NTU or by your Accommodation Provider on behalf of NTU, through your activities and engagement with us (as detailed in the existing privacy notices) or where you visit an NTU café (where this is required). It may also be provided to us by external public health agencies.

5. How do we use your personal data

We strongly encourage students and staff to engage with NHS Test and Trace and also report to us where they have symptoms or a positive test via the relevant NTU Coronavirus Form.

Where you disclose to us that you have received a positive NHS COVID-19 test (or are self-isolating because you have symptoms) we will use the information to provide support and advice where required in relation to your studies or employment. We may need to share information with different areas within NTU in order to provide such support but this will be done only where necessary to support you or to manage health and safety risks to staff, students and visitors.

We may also provide information to Local Authority Public Health Team and/or Public Health England to inform and support their local response to the COVID-19 global pandemic.

We may also need to use data provided by you or data we routinely collect about dates and times when you were on NTU premises to decide whether we need to provide your details to NHS Test and Trace, Local Authority Public Health Team and/or Public Health England.

6. What is the legal basis for processing the data

NTU must have a legal (lawful) basis in order to process personal data. For the purposes described these have been identified as follows:

- **Legal obligation:** the processing is necessary to comply with the law (not including contractual obligations) by ensuring health and safety within the NTU community and environment.
- **Public task:** the processing is necessary for us to perform a task in the public interest which includes the provision of a safe learning and teaching environment and, for the Local Authorities in terms of controlling the spread of COVID-19.
- **Legitimate interests:** in ensuring the health and safety of our NTU community environment.

6.1 Special Category Personal Data

In addition to the legal basis for processing your personal data detailed above, NTU must meet a further basis when processing what is known as Special Category Data, in this case it is data concerning your health. These have been identified as follows:

- for the purpose of carrying out obligations and exercising specific rights of NTU or individual data subjects in the field of employment and social security and social protection law.
- for reasons of substantial public interest.
- for reasons of public interest in the area of public health.

7. How long do we keep your personal data

Where data is already collected for other purposes in accordance with existing privacy notices that data will be retained in accordance with those notices.

Where contact data is given specifically for contact tracing purposes (where NTU are required to do so) as a result of a visit to a campus café or other facilities (such as sports facilities) that data will be retained for a period of 21 days.

Where students have told us that they are self-isolating (with or without symptoms) and/or have received a positive COVID-19 test, that data will be retained for 12 months unless required for other academic or support purposes such as to support extenuating circumstances claims.

Where contact data is collected through the booking form when you book a COVID-19 test, this is retained for a period of 28 days. Data collected when you pick up or are provided with a Home Testing Kit is retained for a period of 12 months.

Where an employee has told us that they are self-isolating (with or without symptoms) and/or have received a positive COVID-19 test, the data will be retained in accordance with the existing employee privacy notice in relation to sickness and absence management.

8. Who we share your data with

We will only share your information in identifiable form where this is necessary for the purposes outlined in this notice. Any other University reporting requirements, for example, to the Office for Students, will be fulfilled by anonymised data and you will not be identified from this.

In order to help reduce the spread of COVID-19, we may share information about you outside NTU with government bodies, including (but not limited to) Local Authority Public Health Team (Nottingham City Council/Nottinghamshire County Council) and/or Public Health England - for example (but not limited to) supporting Government and local response to the COVID-19 global pandemic, or following a request from NHS Test and Trace, or the Local Authority (Nottingham City Council/Nottinghamshire County Council)/Public Health England. This information will be limited to name, contact details (address/telephone

number); or if you have tested positive after taking an NHS COVID-19 test and when that test was taken.

Information obtained when you collect or are provided with a Home Testing Kit will be shared with the NHS, PHE and DHSC (Department of Health and Social Care).

With regard to students, we share information with our partner accommodation providers in order for them to take appropriate steps to provide support you and to take any action required to safeguard you and others.

Where it is necessary as part of your course requirements to undertake a professional work placement in a care or educational setting, we will also share your personal data with the relevant NHS organisations and schools, to ensure lawful compliance within that workplace.

9. How do we keep your data secure

NTU takes information security extremely seriously and has implemented appropriate technical and organisational measures to protect personal data. Access to information is restricted on a need-to-know basis and security arrangements are regularly reviewed to ensure their continued suitability.

10. Your rights

Under Article 15 of the GDPR individuals have a right of access to data about them which is held by NTU; these rights include:

- to access and obtain a copy of your personal data;
- to request that we rectify inaccuracies, and where appropriate, the right to have incomplete data completed;
- to request to have your personal data erased in limited circumstances (it will not apply where the personal data is needed for the purposes of an overriding public interest);
- to request that we restrict the use of your personal data. This is a limited right which will apply in specific circumstances and for a limited period (e.g. where a complaint has been received, until that complaint has been resolved);
- to object to use of your data by us for any direct marketing, and to require us to stop such marketing.

The above rights are not absolute, and NTU may be entitled to refuse requests where exceptions apply.

If you wish to exercise any of these rights or if you have a complaint about the way you believe your data is being processed, in the first instance, please contact us at DPO@ntu.ac.uk.

11. This privacy notice

From time to time we may make changes to this Privacy Notice because we may need to reflect changes in the processing of personal data in accordance with any COVID-19 requirements. All alterations will be posted on this page and will apply from the time we post them. Where we have a valid email address for you we will periodically email you to inform you of any substantial changes and/or to send you a link to our current privacy statement.