

## Covid-19 contact tracing and outbreak management: privacy notice

This notice provides information about how the University will process personal data for:

- Contact tracing, including the NHS Test and Trace scheme;
- Covid-19 outbreak management

It covers the data protection aspects of these processes. For health and safety guidance on both of these areas, see the University's [Covid Safe Planning Guidance](#).

**If you have symptoms of coronavirus, you must have a Covid-19 test and you and all members of your household must self-isolate until you have a negative test result. Please inform the University if you have symptoms or have tested positive using our [Covid-19 reporting forms](#) for staff and students.**

### 1. Contact tracing, including NHS Test and Trace

[NHS Test and Trace](#) is part of the government's national strategy for controlling the Covid-19 pandemic. It enables people who report symptoms of Covid-19 to be tested to determine if they have the virus. NHS Test and Trace will contact the close recent contacts of those who test positive to enable them to self-isolate and to be tested if they develop symptoms.

In accordance with government guidance, the University keeps records for the purposes of NHS Test and Trace for some of our operations (e.g. eat-in cafes/restaurants, bars, libraries and gyms). In addition, we may be contacted by NHS Test and Trace for information where a student, staff member or visitor who has tested positive for Covid-19 has reported having recent contact with someone at the University.

The University of Greenwich will process the following personal data in relation to contact tracing:

- Name and contact details (usually telephone number)
- Time and date of arrival (and sometimes departure)

If you are a student or member of staff at the University of Greenwich, the University is likely to already have this information about you, which will be held on the University's systems. You will have provided the contact details to us, and if you enter a building with digital access this data will also be collected. Information may also be collected in the course of attendance monitoring, through use of the SafeZone personal safety app while on campus, and by you providing your details when we request it for contact tracing. Please refer to the relevant Student or Staff [Privacy Notice](#).

If you are a visitor to the University of Greenwich we may collect your personal data in order to allow you access to buildings, which may include catering facilities or libraries, or halls of residence. If you are using the NHS Test and Trace app (available from 24 September 2020), you can scan an NHS QR code on entering one of our venues and you will not need to provide contact details to us, unless we require the information for other purposes.

We process this personal data about you for the purpose of contact tracing, including providing information to NHS Test and Trace when requested. We may share this data with NHS Test and Trace, if it is requested from us, or other legitimate authorities.

The retention period for this data is 21 days for this purpose. If the data is already held about you for other reasons, it will be retained for the relevant retention period in relation to that reason. These are set out in our [Retention Schedules](#).

## 2. Outbreak management

Students and staff who develop the symptoms of Covid-19 or test positive should inform the University using our [Covid-19 reporting forms](#). The University will use the information which is provided for the purposes of outbreak management, including providing the individual making the report with support, identifying contacts and informing official agencies.

Where an individual informs us that they have developed the symptoms of Covid-19 or has tested positive for Covid-19, we will seek where possible to inform students / staff who we believe may have had close recent contact (in the two days before the onset of symptoms or in the 10 days after the onset of symptoms) with the individual to enable them to take precautions in advance of potentially being contacted by NHS Test and Trace. In line with [government guidance](#), this will be done without disclosing the identity of the individual unless the individual is willing for their identity to be disclosed to fellow students / co-workers.

If we become aware of a positive Covid-19 test, we will notify the local Public Health England Health (PHE) Health Protection Team. We are required to notify PHE if we become aware of more than one positive case in a setting with symptoms dating within 14 days of each other, as it is a potential outbreak. The information that we may be asked to provide as part of [Covid-19 early outbreak management](#) may include details of cases, including:

- Contact details of the people affected and their programmes (if applicable);
- When the individual or individuals became unwell or a test was undertaken;
- When they were last present in the University;
- The nature of the roles/job undertaken by anyone affected;
- Known links between the individuals with Covid-19;
- Number of people that the individual or individuals had close contact with, including details of those they live with if they are in University accommodation.

Notifications to PHE will be made by the Safety Unit ([safetyunit@gre.ac.uk](mailto:safetyunit@gre.ac.uk)).

For the purposes of infection control and outbreak management, and supporting affected individuals, we may also share details of cases and contacts of cases with:

- Our local authority partners (the Royal Borough of Greenwich and Medway Council, as appropriate);
- Our university partners at Medway (the University of Kent and Canterbury Christ Church University) where cases relate to the Medway campus;
- Trinity Laban and Ravensbourne University of the Arts where cases relate to halls that are used by their students and University of Greenwich students or (in the case of Trinity Laban) where the data sharing is necessary for managing any outbreak at the Old Royal Naval College site;
- The management of halls of residence not under our control, where positive, symptomatic or self-isolating students from the University of Greenwich are resident in the halls.

We may use data from University systems (e.g. door access data) to identify and investigate breaches of self-isolation requirements and other breaches of our [Covid Safe Charter](#).

Data which we hold for the purposes of outbreak management (including data provided by staff and students through our reporting forms) will be retained for 6 years.

### **3. Legal basis**

For processing personal data for contact tracing and outbreak control, we rely on the following legal bases:

- 'Public Task' (as the University is a public authority carrying out its functions);
- Where personal data is 'special category' data in the sense of the GDPR (e.g. health information): we rely on 'Employment, Social Security and Social Protection Law' (as the processing relates to the University's obligations under health and safety legislation pertaining to employment) and 'Public Health' (as the processing is in response to a threat to public health during the Coronavirus pandemic).

You can find out more information about this by looking at our [Data Processing Activities Register](#).

### **4. Your rights and further information**

You have rights as a Data Subject. You can see more information about those rights [on our website](#).

To contact Peter Garrod, the University of Greenwich Data Protection Officer and University Secretary, email: [compliance@gre.ac.uk](mailto:compliance@gre.ac.uk).

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