

****

**Privacy Notice**

**Contact Tracing and Lateral Flow Device (LFD) Testing**



**Privacy Notice – Contact Tracing & Lateral Flow Device (LFD) Testing**

**Introduction**

Belfast Met (“the College”) recognises and respects the importance of your privacy and is committed to treating your personal information responsibly and in compliance with all relevant data protection legislation.

We are currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that the College takes a range of measures to protect the health and wellbeing of all students, staff and visitors on campus.

One of the key measures put in place by the College is the collection of information for the purpose of supporting the Public Health Agency (PHA) Contact Tracing Service in Northern Ireland, which notifies individuals that they may have been exposed to the virus.

The College will also be participating in the Workplace Collect Testing programme for individuals willing to take lateral flow device tests.

The purpose of this Privacy Notice is to advise you of the information that the College is required to collect and how it will be used for the purposes of contact tracing and lateral flow device testing. All data processed for the above purposes will be proportionate and necessary, and will be managed in full compliance with the College’s obligations to the UK General Data Protection Regulations (UK GDPR) and the Data Protection Act 2018.

The College’s Data Protection Officer is Gillian Magee. For any questions about this Privacy Notice please contact [dataprotection@belfastmet.ac.uk](mailto:dataprotection@belfastmet.ac.uk)

**Lawful Basis**

The College is permitted to process personal data where there is a lawful basis to do so. The UK GDPR ‘lawful basis’ for our processing will be the following:

* **Article 6.1 (a)** – the data subject has given consent to the processing
* **Article 6.1 (e)** - processing is necessary for the performance of a task carried out in the public interest of in the exercise of official authority vested in the controller

Our lawful basis for processing Special Category information in relation to these requests are:

* **UK GDPR Article 9(2)(b)** – processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.
* **UK GDPR Article 9(2)(g) –** processing is necessary for reasons of substantial public interest.
* **UK GDPR Article 9(2)(i) –** processing is necessary for reasons of public interest in the area of public health.

**Data Protection Act (2018) Schedule** -

* Data Protection Act (2018) Schedule 1 (Part 1 (1)) - Employment, social security and social protection.
* Data Protection Act (2018) Schedule 1 (Part 2 (6)) - Statutory etc and government purposes

**Categories of Personal Data**

The College will only collect the information we need to allow us to fulfil our obligations to risk mitigation.

In the event of a positive case notification the College will collect the following data:

* Student Number (unique identifier under GDPR)
* Name
* Date of Birth
* Address
* Covid Test Data (test date and result)
* Contact Telephone number

In the event of a close contact notification, the College will collect the following data:

* Student Number (unique identifier under GDPR)
* Name
* Date of birth
* Address
* Contact telephone number
* Name of those identified in College as potential close contacts

Personal data captured for the Lateral Flow Device testing:

* Name
* Address

Please note, the above lists are not exhaustive. The College will only collect the information we need to allow us to fulfil our obligations to risk mitigation.

**Who will have access to my information, or who will you share it with?**

This information will be recorded and stored securely and will only be accessed on a needs only basis.

The information you provide us with will be shared with the PHA if a visitor, staff or student has a positive test result. The PHA has a privacy notice to explain how they use your information and can be accessed via <https://www.publichealth.hscni.net/privacy-notice>

The College will share your information with the Department of Health and Social Care (“DHSC”) for the purposes of the Workplace Collect Testing. Privacy Information is available via the below links:

<https://www.gov.uk/government/publications/coronavirus-covid-19-testing-privacy-information/testing-for-coronavirus-privacy-information-quick-read--2>

<https://www.publichealth.hscni.net/covid-19-coronavirus/testing-and-tracing-covid-19/privacy-information>

We may rely on a number of exemptions, which allow us to share information without needing to comply with all the rights and obligations under the Data Protection Act (2018).

**Retention Period**

The COVID-19 global pandemic was an unforeseen event, and so the collection of this personal data is not typical to College business. The information we are required to gather will be retained only for as long as is necessary, and then securely disposed of. The College will be guided by relevant statutory authorities and legislation regarding retention and disposal timeframes.

Personal Data processed under the Lateral Flow Device testing scheme will be retained for a period of 12 months from the date of collection.

**Further Information**

For full details on our Privacy Notice and your Rights, please visit:

[Privacy Policy - About Us - Belfast Met](https://www.belfastmet.ac.uk/about-us/corporate-information/privacy-policy/)

The Information Commissioner’s Office (ICO) have also provided additional information regarding contact tracing on their website - <https://ico.org.uk/global/data-protection-and-coronavirus-information-hub/customer-logs-protecting-customer-and-visitor-details/>

Appendix 1: Test Kit Privacy Notice

Privacy Notice Summary

It is important that you read this document before collecting your test kit

The NHS Test & Trace Programme in England is run by the Department of Health and Social Care. This makes us the Data Controller.

NHS Test & Trace uses your personal data in several ways to help keep the public safe.

This privacy information summary briefly covers how we process personal data and is in support of the NHS Test & Trace Programme privacy notice.

You can access the full privacy notice for more in depth details on how long we store your data by category and who we share your data with on the link below. \*

Why do we collect your data?

Your personal data is helpful in our efforts to defeat the virus.

We ask for your information for three main reasons:

1. ‘TEST’: to identify people with COVID-19 including those who have previously had the virus
2. ‘TRACE’: to identify people who may have been exposed to the virus through close contact with others who have tested positive, and
3. ‘CONTAIN’: to inform where we collect research data to help us stop the spread of COVID-19

What data do we collect?

To meet requirements set out by the Medicines and Healthcare Products Regulatory Agency (MHRA), we will need to collect the following information from you before you can collect a home test kit from this site:

* Your first name and surname
* Your contact telephone number

Who else can access your personal data?

Your personal data is confidential. We take necessary security measures to protect it.

Data protection laws mean we can’t share your data with anyone else unless it is necessary to do so.

We may need to share some of your personal data with partnering organisations, for example those who help us deliver testing kits to home addresses.

We will not share the data you give us today with your GP or contacts.

How long do we keep your personal data?

How long we keep data depends on what it is used for. Typically, we keep data in the programme for up to 8 years. This is reviewed periodically and could change.

What are your rights?

Your personal data is yours.

You have the right to get copies of the information we hold about you, update it if you think it is inaccurate, and limit or object to how we use your data. You also have the right to have personal data removed in certain circumstances.

It is also your right to complain about our use of your data to the Information Commissioners Office who are our regulator but please contact us first to try and resolve any problems.

If you want to make a request about your data email [data\_protection@dhsc.gov.uk](mailto:data_protection@dhsc.gov.uk).

Your personal data helps the NHS Test and Trace programme combat COVID-19.

Access the full privacy notice using the link below:

\* https://www.gov.uk/government/publications/nhs-test-and-trace-privacy-information/test-and-trace-overarching-privacy-notice

Further background on MHRA requirements

To satisfy Medicines and Healthcare products Regulatory Agency (MHRA) requirements we will require the test site to collect your first name, surname and contact telephone number before you collect a self-test kit. This is so we can contact you in order to fulfil our regulatory requirement to MHRA in the event of a batch recall, or adverse incidents investigation, or issuing of a field safety notice. We will only use this data to contact you.

