

COVID 19 PRIVACY NOTICE

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Background

The University College of Osteopathy (UCO) is committed to protecting the privacy and security of your personal information. Our privacy notices for staff and students cover how we apply data protection principles to processing information. They are accessible [here](#).

This additional notice relates to specific information we are collecting and processing to help us in our response to the COVID-19 pandemic. It aims to help you understand what personal data we collect about people who report that they have COVID-19 symptoms, asymptomatic lateral flow test results and current vaccination status. This Privacy Notice explains also why we collect the personal data, what we do with it, how we keep it safe, and your individual rights over it.

UCO, located at 275 Borough High Street, London SE1 1JE, is registered as a data controller with the Information Commissioner and you are welcome to contact our Data Protection and Freedom of Information Officer, by emailing dpfio@uco.ac.uk or by post.

What type of personal data is being collected?

Symptoms and concerns about possible contacts

When informing UCO that you have symptoms of Covid-19, are having to self-isolate or have concerns about being a potential contact with someone with Covid-19 you may provide us with your name, relationship to UCO (year group if a student, broad role if a member of staff), phone number, situation, date of symptoms onset, start and end of isolation period, test dates and results, most recent attendance date at UCO, context of UCO attendance and environment at UCO, control measures that were in place at your last attendance, contact with other agencies and use of the COVID-19 App.

Asymptomatic test results

When informing UCO about having a COVID-19 test as part of the asymptomatic testing programme for those working and studying at universities, you may provide us with your name, UCO email address, relationship to UCO (whether you are a student or staff member), year group if you are a student, test date, test result, an image or file showing your test result (which may contain additional information about you). This is so that UCO can monitor the engagement of students and staff and is part of our controls and adherence to government guidance to manage the risk of COVID-19 transmission.

Vaccination status

When informing UCO about your vaccination status, you may provide UCO with your email address, relationship with UCO (whether you are a student or staff member), year group if a student, date of vaccination, place of vaccination and an image or file showing evidence of vaccination (which may contain additional information about you).

How will UCO use this information and for what purpose?

UCO will use this information in order to help us plan and organise our response to COVID-19 as part of protecting people from infection and as part of national and regional monitoring and associated actions. In this context, the information is also being used to support UCO's planning of safe delivery of its teaching and clinical services.

Who can access my personal data and who might they share it with?

The Deputy Vice Chancellor (Research) and the Head of Clinical Practice have access to this information and may share it anonymously with colleagues to inform risk management, planning and policy development. On a need-to-know basis identifiable selected information may be shared with others at UCO including Registry, Student Support and Human Resources. Examples of why we might share selected information include: supporting test and trace activity, promoting adherence to asymptomatic testing and vaccination uptake.

We may also share selected information anonymously with Public Health England, Southwark Public Health, The Department for Education, and The Office for Students. In some instances, for example to support outbreak management and test and trace activity, we may share identifiable information with Public Health England and Southwark Public Health if required to do so.

You might also wish to read the [NHS Test and Trace's Privacy Notice for LFD Collect](#) and the [NHS COVID-19 app privacy notice](#).

If you attend an event at UCO and do not use the NHS Covid app to scan the Test and Trace QR barcode, we may use data from your ID card to support Test and Trace activity.

How will we store your personal data?

UCO will store your personal data electronically and securely using its Microsoft 365 facilities on secure cloud servers.

On what legal basis are you processing these data?

The legal basis for using the personal information as described above (with the exception of health information such as symptoms or a positive test result) is 'public interest'; UCO is processing this personal information because it is necessary for the performance of a task carried out in the public interest in accordance with Article 6 1 (e) of the UK General Data Protection Regulation (UK GDPR). Where the personal data consists of special category information, such as medical / health information (e.g. your test result itself or symptoms), the additional lawful bases for this data processing are to protect the public interest in the area of public health, for preventive and occupational medical purposes and to meet employers' duties of care.

How long will we keep the data?

The length of time that we store personal data (called a retention period) is directly linked to its purpose and how long it is needed. This retention period is under constant review as the national and regional reporting requirements are continually evolving and it is not yet fully known how long the personal data will be needed for. Unless otherwise specified in this privacy notice, the retention period is currently set at a maximum of 12 months from the end of the pandemic. If this retention period needs to be changed it will be updated in this privacy notice. After that time, we will destroy or fully anonymise the data. If the data is fully anonymised it no longer counts as personal data and it may be used for statistical purposes, for example, to monitor the number of people using the online form, or to estimate the number of people using the listed venues on campus.

What rights do I have regarding my personal data?

You have the right to [correct your personal data](#). You may have [the right to have your personal information deleted](#), the [right to restrict processing](#), the [right to object](#) and / or the right to [data portability](#). Follow the links to find out whether those rights apply in these circumstances. To do any of those things or if you have followed the links but would like clarification, please email dpfio@uco.ac.uk

You also have the right to [get copies of your personal data](#) which you may do by [making a Subject Access Request to UCO](#). Alternatively, you can request a copy of your personal data by contacting our Data Protection and Freedom of Information Officer, by emailing dpfio@uco.ac.uk or by post to Data Protection and Freedom of Information Officer Data, UCO, 275 Borough High Street London SE1 1JE.

You have the right to lodge a complaint with the Information Commissioners Office about UCO's handling of your personal data and can find out more about this on their [website](#).

Where can I get more information?

For more information regarding this privacy notice, you can contact the UCO's Data Protection and Freedom of Information Officer, by emailing dpfio@uco.ac.uk

You can find the UCO's institutional privacy policies and related policies [here](#).