NHS TEST and TRACE and GDPR

As part of the Government policy to help minimise the transmission of COVID-19 and support public health and safety, we are being requested to obtain contact information from all visitors to the College and customers in our service outlets.

The data we are being asked to collect is personal data and will be handled in accordance with GDPR to protect the privacy of our staff, students, fellows and other visitors/customers.

It is not necessary to seek consent from each person but we will have information notices displayed in all outlets detailing why this information is being collected and where your visit has been arranged by College personnel, we will bring this to your attention.

We do already collect certain information via our EPOS payment system as part of our ordinary business purposes and this information may now also be shared with NHS Test and Trace.

We may also now require personal data which we would not collect in our usual course of business which we will only share with NHS Test and Trace. It will not be used for any other purposes including marketing, profiling, analysis or other purposes unrelated to contact tracing. The data will not be misused in any way that is misleading or could cause an unjustified negative impact on people e.g. to discriminate against groups of individuals.

Appropriate technical and security measures are in place to protect visitor’s data.

To support NHS Test and Trace, we will hold these records for 21 days. This reflects the incubation period for COVID-19 (which can be up to 14 days) and an additional 7 days to allow time for testing and tracing. After 21 days, this information will be securely disposed of or deleted. When deleting or disposing of data, we will do so in a way that does not risk unintended access (e.g. shredding paper documents and ensuring permanent deletion of electronic files).

Records which are made and kept for other business purposes do not need to be disposed of after 21 days. The requirement to dispose of the data relates to a record that is created solely for the purpose of NHS Test and Trace. All collected data, however, will comply with the General Data Protection Regulation and will not be kept for longer than is necessary.

All individuals are able to exercise their data protection rights such as the right of erasure or the right to rectification (where applicable)

You retain the right at all times to lodge a complaint about our management of your personal information with the Information Commissioner’s Office at https://ico.org.uk/concerns/.

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Nick Milne – Domestic Bursar