Covid Reporting Application and data protection guidance

1. Overview

1.1 In managing the return of staff and students to campus, the University will ensure that it continues to provide a safe environment for people to work and study and that appropriate measures are in place to support compliance with Government guidance.

1.2 As part of that, the University will need to collect and process personal data about staff, students and third parties, including health data. This includes the data we collect in our Covid Reporting Application, for example, relating to individuals who are self-isolating as a result of a positive test, Covid-19 related symptoms, or contact with an individual with Covid-19.

2. Data Protection principles

2.1 The Information Commissioner has published ‘Six data protection principles for organisations’\(^1\) which set out the key steps that organisations need to consider about the use of personal data in relation to Covid-19, lockdown and other restrictions, and Government guidance.

2.2 In collecting and processing your personal data, the University will:

   2.2.1 Only collect and use what’s necessary
   2.2.2 Keep data to a minimum
   2.2.3 Be clear, open and honest about the use of your data
   2.2.4 Treat you fairly
   2.2.5 Keep your information secure
   2.2.6 Ensure that you can exercise your information rights.

3. How will your data be used

3.1 The information that we collect will be used for the following purposes:

   3.1.1 To protect the health of staff, students and other members of the University community and to inform decisions about the steps to take in meeting our health and safety obligations;
   3.1.2 To assess and manage any risks relating to individuals working, studying or living on campus, including both the return to and departure from campus, for example, at the start and end of term; and
   3.1.3 To record and monitor the self-isolation and quarantine of individuals, for example where necessary to protect the health of staff, students or others (such as our campus partners), to provide necessary support to individuals, and to meet other public health obligations in response to Government guidance.

4. Who will your data be shared with

4.1 Details collected through the Covid Reporting Application will be accessible to relevant staff in the Health & Safety and the Residential Life teams.

4.2 Information will only be shared with other University staff – including those within your School or Division – where it is necessary for the purposes of protecting the health of members of the University community or to provide appropriate support. Where possible, we will not disclose any personal data but, where that is required, it will be limited to what is needed.

4.3 Information will only be shared with parties outside of the University, such as our campus partners, where it is necessary. We will not disclose any personal data where it is not required, for example, to arrange for a general area on campus to be cleaned. In some cases, though, we will need to disclose your personal data, for example to the Building Managers or Security team in Sussex Estates & Facilities, but we will only share what personal data is necessary.

5. Retention and deletion of data

5.1 All personal data will be held in line with the University’s Data Protection Policy and appropriate measures are in place to keep your data secure.

5.2 Personal data will only be held for as long as is necessary for the purposes in 3.1 and will be deleted once it is no longer needed for those purposes.

6 Further information

6.1 If you require further information about the Covid Reporting Application or how the Health & Safety team will use the information, please contact them at healthsafety@sussex.ac.uk

6.2 If you require further information about how your personal data will be used, or if you wish to exercise your information rights please contact the Data Protection Officer at dpo@sussex.ac.uk

6.3 Further detail about the University’s general processing of personal data related to Covid-19 can be found here.