

Privacy Notice – Health Declarations COVID 19 response measure (Staff, students and Campus Visitors)

We are currently experiencing a public health emergency because of the coronavirus (COVID-19) pandemic. It is therefore critical that South West College takes a range of measures to keep the College community safe. The completion of health declarations by staff, students and visitors to campus is one of the measures that the College is taking in the task of minimising transmission and providing a level of assurance to the College community.

SWC (Data Controller) values the relationships with all staff, students, visitors and stakeholders and this notice explains how the College collects, processes and manages your personal data. The College will process all personal data in compliance with the Data Protection Act 2018 for the purpose of providing you with a service you have requested and to meet our statutory obligations. We will never ask for information that is unnecessary to deliver this service. SWC is the Data Controller registered with the Information Commissioner Office (ICO) and is responsible under the Data Protection Act 2018 for the personal data that you submit to us.

The Data Protection Officer for the College is Joanne Lucas.

The College's registration reference number with ICO is Z1124639.

What data will we collect?

In compliance with the 'data limitation' Principle of GDPR, the College will only collect data which is necessary to fulfil the purpose of protecting everyone from exposure to illness/infection and take action where appropriate. You may be asked to supply all, or some of the following depending on whether you are a member of staff, student, or visitor.

- Name
- Student ID
- Date of birth
- Contact details
- Course details
- Purpose of visit
- Health information relating to COVID symptoms
- Contact with others who have tested positive.
- Information relating to travel outside of Northern Ireland in the previous 10 days.

What is the lawful basis for collecting this data?

As an FE College our main lawful basis for requesting the completion of health declarations is:

Article 6.1(e) • processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller.

Health data is classed as “special category data” under UK GDPR. Therefore, it is also necessary that we satisfy one condition under Article 9. The condition that we are relying on for the processing of sensitive data collected through health declarations is:

Article 9.2 (i) : “processing is necessary for **reasons of public interest in the area of public health**, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy”.

How will we collect this data?

The College will collect your data through the use of an online health declaration.

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

This information will be stored securely and will only be accessed by:

- Staff Declarations: The Lead COVID Supervisor and one member of HR staff.
- Student and Visitor Declarations: Covid Supervisors

All information will be treated as confidential and processed in accordance with GDPR.

How long will the College keep my data for?

Information collected will be retained for no longer than 1 month although staff and students may be required to submit more than one health declaration depending on their circumstances and if the College has to go into extended periods of lockdown.

Data Subjects Rights

You have the right to:

- To be informed about what we do with your information at point of data collection
- Access your personal data that we process;
- To rectify inaccuracies in personal data that we hold about you;
- To be forgotten, that is your details to be removed from systems that we use to process your personal data
- To restrict the processing of your personal data
- To obtain a copy of your personal data in a commonly used electronic form
- To object to certain processing of your personal data by us
- To request that we stop sending you direct marketing communications

- To withdraw consent – only where processing is based on consent
- To not give consent to the recording of your contribution to class discussion when sessions are being recorded unless your contribution is essential for assessment purposes.

For additional information on exercising your rights, please contact our Data Protection Officer (details below) or see our [Data Protection Policy](#).

The Right to Lodge a Complaint

If you are not happy with how your information is being processed by the College, contact the DPO:

*Data Protection Officer
South West College
Burn Road
Cookstown
Co Tyrone
BT80 8DN*

Email: gdpr@swc.ac.uk

If you are dissatisfied with the College response, you have a right to complain to the Information Commissioners Office (ICO).

The ICO contact details are:

*Information Commissioner's Office
Wycliffe House
Water Lane
Cheshire
SK9 5AF*

Tel: 0303 123 1113 or 01625 545 745

Further Information

More information on how the College manages your personal data can be found on the College website

[Link to South West College Privacy Notice](#)