# **South West College**



# **Privacy Notice – Contact Tracing COVID 19 response measure**

We are currently experiencing a public health emergency as a result of the coronavirus (COVID-19) pandemic. It is therefore critical that South West College takes a range of measures to keep everyone safe. Contact tracing is a key measure in the task of minimising transmission.

SWC (Data Controller) values the relationships with all students, staff 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.

# Why are we collecting your data?

South West College will collect the details, and maintain records, of staff, customers and visitors on their premises to support the Public Health Agency (PHA) Contact Tracing Service in Northern Ireland.

Participation in this scheme is voluntary, although strongly encouraged, and you will be provided with the option not to provide details. Your information will not be used for any other purposes.

### What is the lawful basis for collecting this data?

As a FE College our main lawful basis for processing your personal data for contact tracing 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.

#### What data will we collect?

The College will collect the personal data that is necessary i.e.

- Name
- Contact details

- Date and details of College facility attended
- Time in and, where possible, time out of College facilities

#### How will we collect this data?

The College will collect your data through the use of Track & Trace Cards or signing in sheets at College Receptions.

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

This information will be recorded and stored securely in hard copy format (Track & Trace Cards and sign in sheets) and will only be accessed by the COVID Supervisors 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 using this link, <u>Link to PHA privacy notice</u>

### How long will the College keep my data for?

Information collected for the purpose of Contact Tracing will only be kept for 21 days after which it will be destroyed by shredding or through our confidential waste provider.

### **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**

The Information Commissioner's Office have more information regarding contact tracing on their website at contact tracing.

Link to ICO contact tracing 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