

Privacy Notice – Covid-19 Reporting Form

Your privacy is important to us. This privacy notice explains what personal data DN Colleges Group collects from you, through our interactions with you and through our products, and how we use that data. DN Colleges Group is committed to protecting the privacy and security of your personal information. As a "data controller" we are responsible for deciding how we hold and use personal information about you. We are required under data protection legislation to notify you of the information contained in this privacy notice.

This privacy notice describes how we collect and use personal information about you regarding Covid-19 reporting, in accordance with the General Data Protection Regulation (GDPR).

In managing the return of staff and students to college, DNCG 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.

As part of that, we will need to collect and process personal data about staff, students and third parties, including health data. This includes the data we will collect in our COVID-19 Reporting Form ('Reporting Form').

It is important that you read this notice, together with any other privacy notice we may provide on specific occasions when we are collecting or processing personal information about you, so that you are aware of how and why we are using such information.

DN Colleges Group is registered under the Data Protection Act 2018. This means that the purposes for which the College collects, and processes personal data is notified to and registered with the Information Commissioner's Office (ICO), under the Registration Number **ZA341759**.

DN Colleges Group (also referred to below as 'we') will collect the following information from you, which we need in order to carry out our functions. The legal grounds for processing the information are outlined under each section and where your consent is required, we give you the opportunity to opt in.

Data protection principles

We will comply with GDPR. This says that the personal information we hold about you must be:

1. Used lawfully, fairly and in a transparent way.
2. Collected only for valid purposes that we have clearly explained to you and not used in any way that is incompatible with those purposes.
3. Relevant to the purposes we have told you about and limited only to those purposes.
4. Accurate and kept up to date.
5. Kept only as long as necessary for the purposes we have told you about.
6. Kept securely.

How will your data be used

The information that we collect in the Reporting Form will be used for the following purposes:

- To inform decisions that DNCG and partners take to protect the health of members of the staff, students and site visitors.
- To ensure and record that relevant members of DNCG are positive for Covid-19 and that this is recorded in order protect the health of staff of the College and our partners.

- So that DNCG can follow up on queries asked by individuals completing the Reporting Form or where follow up is required to ensure that reasonable steps have been taken to protect the health of other members of staff, students and site visitors.

Who will your data be shared with

- Details provided in the Reporting Form will be held centrally and used by the Health and Safety Team and HR and will only be accessible by relevant individuals within those teams.
- Information will only be shared with other College Managers where it is necessary for the purposes of protecting the health of the staff, students and site visitors.
- Where possible, we will not disclose any personal data but, where that is required, it will be limited to what is needed.
- Information will only be shared with parties outside of DNCG, such as our 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.

Our lawful basis for using this data

We only collect and use personal information about you when the law allows us to. Most commonly, we use it where we need to:

- Meet government requirements with regards to Covid-19 outbreak management

Data security

We have put in place appropriate security measures to prevent your personal information from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to your personal information to those employees, agents, contractors and other third parties who have a business need to know. They will only process your personal information on our instructions, and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data security breach and will notify you and any applicable regulator of a suspected breach where we are legally required to do so.

Data retention

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

Personal data will only be held for as long as is necessary for the purposes outlined in “**Our lawful basis for using this data**” and will be deleted once it is no longer needed for those purposes, for example, when the risk of further Covid-19 infections has reduced to appropriate levels.

Your rights

Under the General Data Protection Regulation, you have various rights in relation to your personal information:

- The right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

Please note, exemptions may apply when making a request to exercise your rights, for example where we have to retain or process information for legal purposes. For more information on your personal data rights visit www.ico.org.uk/your-data-matters

How to access the personal information we hold about you

Individuals have a right to make a 'Data Subject Access Request' to gain access to personal information that we hold about them. Please refer to our **Data Protection (GDPR) Policy** for more information on how to make a request or contact our **Data Protection Officer** (details can be found below).

Your other rights regarding your data

Under data protection law, individuals have certain rights regarding how their personal data is used and kept safe. You have the right to:

- Object to the use of your personal data if it would cause, or is causing, damage or distress
- Prevent your data being used to send direct marketing
- Object to the use of your personal data for decisions being taken by automated means (by a computer or machine, rather than a person)
- Claim compensation for damages caused by a breach of the data protection regulations
- To exercise any of these rights, please contact the Data Protection Officer.

Data protection officer

We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have any questions about this privacy notice or how we handle your personal information, please contact the DPO. You have the right to make a complaint at any time to the Information Commissioner's Office (ICO), the UK supervisory authority for data protection issues.]

Our Data Protection Officer is:

Terry Hutchinson – Director of Curriculum Support & Governance
dpa@dncolleges.ac.uk

Changes to this privacy notice

We reserve the right to update this privacy notice at any time, and we will provide you with a new privacy notice when we make any substantial updates. We may also notify you in other ways from time to time about the processing of your personal information.