



Privacy Notice

for the University of Cambridge Asymptomatic COVID-19 Screening Programme.

[Version 3. Issued. 25th September 2020. Last revised 19th April 2021]

A general Privacy Notice for students can be found here: [How we use your personal information \(for students\)](#).

This Privacy Notice supplements the general Privacy Notice. It summarises how your personal data will be collected, handled and shared as part of the University of Cambridge Asymptomatic COVID-19 Screening Programme, whether or not you consent to participate in the swabbing process each week. Further information about the University of Cambridge Asymptomatic COVID-19 Screening Programme can be found in the [Student Information Sheet](#).

In this document, GDPR refers to the [European General Data Protection Regulation](#) as it continues to form part of UK law following Brexit. The DPA refers to the UK's [Data Protection Act 2018](#). Cambridge University Hospitals NHS Foundation Trust is also known as Addenbrooke's Hospital.

Part A. Data processing relevant to ALL students

- **Data controllers and data processors:** The principal data controller for this programme is the University of Cambridge. The Colleges associated with the University of Cambridge will also be data controllers in the ways explained below. Data processors operating under the instruction of the data controllers include contracted IT suppliers.
- **Type of personal data:** To administer this programme, the University and Colleges will process basic personal data about all students – particularly those living in College accommodation – including your name, university email address, student identifier, date of birth, course of study, and College residence. You have already given us this information. Using this data for this programme is compatible with the original reasons we asked you for it. As described in the general Privacy Notice, those purposes included to deliver and administer a high-quality education, to deliver services to you, to communicate effectively with you, to conduct research for public interest purposes, and to support student welfare. For this programme, we will also collect and process information about the College 'household' to which you belong. This information is generated by your College to assist with COVID-19 outbreak management. It is possible that we will indirectly come into possession of information about your COVID-19 risk status (i.e. a rough probability) without you undergoing a swab, for example if you have been in close contact with a household or individual who tests positive.
- **Purpose for processing:** The purpose of this programme, and the personal data processing which it entails, is to protect the health of students and their close contacts from COVID-19, for example by reducing the risk of virus transmission, preventing and managing COVID-19 outbreaks in the University and Colleges, generating good evidence for targeted advice to members of the University to self-isolate (i.e. advice that is not too narrow and not too broad), supporting local and national public health authorities, and conducting research to improve public health, infectious disease and COVID-19 science. Positive pooled test results will trigger requests from the University and Colleges that students in the household (including those who did not swab) begin self-isolation. It may also trigger obligations to

follow any binding national, University or College policies on self-isolation that apply in your particular situation (see e.g. [University's advice pages](#)). The purpose of follow-up individual tests is to confirm that one or more people in the household are COVID-19 positive, and to help trace their recent close contacts.

- **Lawful basis for processing:** Under the GDPR, the lawful basis we rely on for processing your personal data in this programme is to perform public tasks, and tasks in the public interest. These include providing higher education safely, supporting public health COVID-19 surveillance and management, and supporting scientific research into COVID-19. We also rely on the lawful basis of meeting the University's, Colleges' and wider community's legitimate interests. These include protecting student welfare and providing a safe environment for services ancillary to higher education (e.g. accommodation), and minimising COVID-19 transmission in the city of Cambridge and other places travelled to by University of Cambridge students. Any health data about you (e.g. COVID-19 test results if you consent to swab (see Part B), or inferences about possible COVID-19 status from belonging to a household with a positive pooled test result) comprise a special category of personal data. The lawful bases for this data processing are to protect the public interest in the area of public health, for preventive medical purposes and for scientific research purposes in the public interest. Although it is not relied upon for compliance with the GDPR, students are given the general choice to opt-in or -out of some aspects of the programme (see Part B).
- **Accountability:** The University and Colleges are responsible under the GDPR to ensure that all personnel and data processors involved in this programme protect your rights and informational privacy, and follow applicable privacy and information security legislation (principally the GDPR, and the DPA).
- **Information security:** Students' personal details will be held securely on systems located either in the UK or in the EEA, which are supplied to the University with GDPR-compliant security levels and contracts. (Test results are stored separately – see Part B). Personal data will be encrypted for storage and transmission, and backed up. Access will be carefully controlled.
- **Communication with you:** While the University and Colleges respond to the current pandemic, you may be contacted by email about this programme for example with updates to the programme, renewed invitations to participate in pooled testing or recommendations that you arrange an individual test. The University and/or your College may also communicate with you when you should self-isolate, for example if your household is linked with a positive pooled test result, or someone in your household (i.e. in close contact with you) receives a positive individual test.
- **Access by others:** Responsible University and College staff, and standard suppliers under contract to provide technological services, will have carefully controlled access to personal data to support the asymptomatic testing programme, but only when necessary.
- **Monitoring, evaluation and scientific research:** Personal data collected about the programme may be processed to support monitoring and evaluation of this programme, and for research in the public interest by the University of Cambridge and other researchers. Wherever possible, this will be done using pseudonymised information (i.e. information with your identifying details removed and not passed on). If any data is presented or published, the data will be fully anonymous, without any means of identifying you. Researchers will abide by codes of ethical conduct.
- **Data storage and retention:** Personal data will be retained for as long as necessary to support the response to the current pandemic, and pseudonymised information (i.e. information with your identifying details removed) will be retained thereafter for as long as necessary for scientific research purposes, which may be up to 20 years.
- **Your rights:** If you need further assistance beyond this Privacy Notice and the Student Information Sheet about how your personal information is being used, please contact the

University's data protection team (data.protection@admin.cam.ac.uk) or its Data Protection Officer (dpo@admin.cam.ac.uk). You also have rights under the GDPR including: to have access to personal data held about you; to correct your personal data; to object to processing of data, and to ask that data be erased. In accordance with the GDPR, these rights are not absolute in this programme. For example, data processing may continue if necessary in the public interest, but not if it is likely to cause you substantial distress. In accordance with the GDPR, your right to erasure is qualified because the lawful bases for processing are to protect public health, preventive medicine and scientific research. You have the right to erasure if data is no longer going to be used for the purposes of this programme, or the purposes for which it was originally collected. If you make a request, we have one month to respond to you. To make a request, please contact the University's data protection team (data.protection@admin.cam.ac.uk) or its Data Protection Officer (dpo@admin.cam.ac.uk).

- **Complaints:** If you wish to complain about how your personal data is being handled in the course of this programme, please notify a responsible person at the University and/or your College as soon as possible so that it can be addressed swiftly. In the University, you can contact the University's data protection team (data.protection@admin.cam.ac.uk) or its Data Protection Officer (dpo@admin.cam.ac.uk). In your College you can contact your College's Data Protection Lead and thereafter, if you are dissatisfied with that response, the Data Protection Officer for the Colleges (college.dpo@ois.cam.ac.uk). If you are not happy with the way your information is being handled, or with the response received from us, you have the right to lodge a complaint with the Information Commissioner's Office at Wycliffe House, Water Lane, Wilmslow, SK9 5AF (<http://ico.org.uk/>)

Part B. Additional data processing for students who CONSENT to swabbing

In *addition* to the data processing and rights explained above, students who consent to swab in the asymptomatic testing programme should note the following:

- **Additional data controllers and data processors, etc.:** Cambridge University Hospitals NHS Foundation Trust is an additional data controller, which occasionally may provide secure appointment bookings for individual tests following a positive pooled test. External laboratory service providers (e.g. Excalibur Healthcare Services) will be contracted to carry out tests but they will *not* have access to any information that identifies you as an individual; they will handle what is known as pseudonymised data.
- **Additional types of personal data:** In addition to basic personal information described above, if you consent to swab as part of the asymptomatic programme, data processed for this programme will include your pooled testing group, the results of your pooled tests, confirmation of provision of an individual follow-up test, and, where applicable, results of individual tests. It will also include your mobile phone number if you provide a mobile phone number on the consent form.
- **Legal basis for processing additional personal data:** The legal bases under the GDPR for processing your test results and information about your pool are the same as stated above. The lawful basis we rely on is to perform public tasks, and tasks in the public interest. These include providing higher education safely, supporting public health COVID-19 surveillance and management, and supporting scientific research into COVID-19. We also rely on the lawful basis of meeting the University's, Colleges' and wider community's legitimate interests. These include protecting student welfare and providing a safe environment for services ancillary to higher education (e.g. accommodation), and minimising COVID-19 transmission in the city of Cambridge and other places travelled to by University of

Cambridge students. Your test results comprise a special category of personal data, namely personal data concerning health. The lawful bases we rely on for this data processing are to protect the public interest in the area of public health, for preventive medical purposes and for scientific research purposes in the public interest. In order to properly protect public health, consent is not being relied upon as the legal basis for processing your test results but as a general means for you to control the creation of test data and to keep interferences in privacy proportionate to the public interest goals.

- **Additional accountability:** in addition to GDPR protections, all persons handling health data about you will be subject to a legal duty of confidentiality. This protects health information about you from misuse.
- **Additional information security:** The University will store test results on systems which meet the Data Security and Protection standards set by NHS Digital (<https://www.dsptoolkit.nhs.uk/OrganisationSearch/8F331>), provided by GDPR-compliant contractors. The systems are externally audited and meet ISO27001:2013 standards. Designated personnel in the University and Colleges will be able to access the results of tests (pooled and individual) in the asymptomatic testing programme by logging into the University's secure IT system that stores test results.
- **Additional communication with you:**
 - **About pooled test results:** The way that you will receive results after a pooled test depends on whether you supply a mobile number on the consent form. If supplied, you will receive a text message swiftly from the University (usually within one day). Otherwise, you will be contacted by your College as soon as possible.
 - **About individual test results:** The way that you will receive individual test results is similar. If you supply a mobile number, individual test results will be sent to you by text message. Designated personnel at your College will be able to view and inform you of your results via the University's dedicated storage system for tests results. Your College will also have responsibility for providing individual test kits in the event of a positive pooled test result. If you organise an individual test through the [University's symptomatic testing programme](#) or the NHS' test-and-trace programme, you will receive your results in accordance with their protocols.
 - **About close contacts:** In the event of a positive individual test result, you may be contacted by local and national public health authorities, the University or your College and asked for additional information to help track-and-trace recent close contacts and for outbreak management purposes.
- **Additional data sharing with others:**
 - **External laboratory services:** After your household submits a pooled test, your pool leader should dispose of the envelope that has identifying details and it will be sent with a barcode to the Excalibur Healthcare Services testing facility at the Cambridge Science Park. In the event of a positive pooled test, the majority of confirmatory individual testing will be arranged by your College, as described above. Bar-coded individual swabs similarly are sent to external laboratory services such as Excalibur Healthcare Services. External laboratory service providers will *not* have access to any information that identifies you as an individual; they will handle what is known as pseudonymised data. This public/private partnership is not unusual; the NHS/government also has partnerships with commercial laboratory service providers for symptomatic COVID-19 tests. For both pooled and individual test results, the testing laboratory will send coded results to the University's highly secure test results database.
 - **Cambridge University Hospitals NHS Foundation Trust:** Students living in College accommodation and registering to participate in the programme in Michaelmas Term 2020 were registered on Epic, the secure electronic medical record system

used by Cambridge University Hospitals NHS Foundation Trust. This is because, at that stage of the programme, this was the route by which all confirmatory individual tests were arranged, carried out and results received. Now, this route is used only in exceptional circumstances, whereby confirmatory testing may be performed at the University testing pod with samples being sent to the Clinical Microbiology and Public Health Laboratory, run by Public Health England in conjunction with Cambridge University Hospitals NHS Foundation Trust. After these individual tests, results will be entered in individual CUH patient health records (Epic) where the patient can view them (via MyChart). Results of these individual tests are also reported to the University's highly secure test results database. A Privacy Notice for Cambridge University Hospitals NHS Foundation Trust is available [here](#).

- **Public health authorities:** In the event of a positive individual test result, data about you will be reported to public health authorities by the University of Cambridge in accordance with public health legislation, and will be processed to support their standard COVID-19 management procedures. The University and Colleges may also have legal duties to report confirmed COVID-19 infections to public health authorities, and will cooperate with public health authorities' efforts to track-and-trace close contacts, and if necessary will supplement this with their own efforts to track-and-trace close contacts who are members of the University as part of its outbreak management plans.
- **Other students:** All swabbing students in your asymptomatic testing *pool* will receive positive and negative pooled test results. All students in your *household* will be informed if there is a *positive* pooled test result (including students who do not swab), so that all members of the household can commence self-isolation. Other students will *not* receive your individual test results. Students will not be told who has consented to participate in the asymptomatic testing programme, but this could be inferred from emails sent to participating students and attendance at the time designated for pooled sample collection.
- **Additional information about scientific research:** If you explicitly consent, you may be contacted by researchers from the University of Cambridge and other institutions about other studies related to this programme (e.g. studies about COVID-19, screening programs, infectious disease, public health surveillance). If you decline, this will not affect ongoing research, nor preclude lawful enquiries from researchers who rely on grounds other than consent as the lawful basis for contacting you. You have no obligation to participate.
- **Withdrawing consent to participate in the programme:** You may withdraw your consent for optional parts of the programme at any point without affecting your legal rights (see Part A). To withdraw, you should submit a new consent form with your new preferences. You may withdraw your phone number. You may withdraw consent to be re-contacted by researchers. You may also withdraw general consent which withdraws you from the list of students requesting swab kits. After withdrawal of general consent, relevant data about you (including data collected up to the point of withdrawal including under this Part B) will be retained and processed in accordance with the information above (see Part A) which applies to all students.

Changes to this Privacy Notice

We keep this Privacy Notice under regular review to make sure it is up-to-date and accurate. We are having to react quickly to unprecedented circumstances, which require significant organisation, in a

fast-changing public health and regulatory environment. We will notify all students of material changes to this Privacy Notice, but please check back regularly to this section for updates.