

How your personal data is used – symptomatic COVID-19 testing and the COVID-19 Helpdesk

This privacy notice describes how your personal data is used and shared when you have symptoms of COVID-19 and book a test at one of the Cambridge University Hospitals/University 'pods', and how the University cooperates (principally via its COVID-19 Helpdesk) with NHS Test and Trace and local public health teams to track and manage cases and outbreaks of COVID-19 involving University students and staff. It supplements the general privacy notices for University students and staff. It does *not* describe how the personal data of students living in College accommodation is used in relation to the University's weekly asymptomatic COVID-19 screening programme, which is explained in a separate privacy notice.

Data controllers

The data controller processing your personal data when you experience symptoms and book a COVID-19 test at the Cambridge University Hospitals/University 'pods' is Cambridge University Hospitals NHS Foundation Trust (CUH; which includes Addenbrooke's Hospital). CUH has published its own general <u>privacy notice for patients</u>. The University of Cambridge and your College also will be data controllers insofar as they are informed about, collect, use and share your test results (including through the operation of the COVID-19 Helpdesk) as described below.

Types of personal data

In order to book and administer a COVID-19 test for you, CUH will need to collect certain personal data, including your name and contact details, certain demographic information and any health information relevant to your test. When your test result is shared with the University/your College as described below, this information may be combined for COVID-19 outbreak management purposes with other personal data already held about you, for example your student/staff identifier and details of where you work and/or reside in University or College buildings and accommodation. The University also collects and shares similar information about you through your completion of the COVID-19 Helpdesk online form as described below. The Helpdesk may from time-to-time process data collected through surveys, to inform outbreak management planning and co-ordination with the local authorities. It is possible that the University/your College will indirectly come into possession of information about your COVID-19 risk status without you taking a COVID-19 test, for example if you have been in close contact with another person who tests positive for COVID-19.

Purposes for processing, including data sharing

When you have symptoms of COVID-19 and book a test at the CUH/University 'pods', you will normally receive your results via the CUH MyChart patient portal (as described in the practical information about the testing process). Email is an alternative possibility if you are unable to use MyChart, using the details you supplied at the point of booking. As with a standard NHS test for COVID-19, if the result is positive it will be fed into the national NHS Test and Trace system, which means you may be contacted to ask for details of your close contacts or for other information. The NHS Test and Trace system itself works closely with, and shares data with as necessary, Public Health England and local public health teams (such as the East of England Health Protection Team and Cambridgeshire Public Health Teams); please see the NHS Test and Trace privacy notice for further information about this.



These national and local health authorities might contact the University and/or your College to ask for further information about you and/or your contacts, or to verify information they already hold, so as to help identify trends and manage outbreaks of COVID-19 in the local area. These requests for assistance from external health authorities will usually be handled by the University's COVID-19 Helpdesk. The types of information within scope will include your name, date of birth, University department/College/course (as applicable), contact details (including current residence), sex, ethnicity, COVID-19 status and test details, as well as details about your close contacts (if applicable).

When you book a test at one of the CUH/University 'pods', your test results will also be returned directly to the University (and, where applicable, your College) to enable rapid responses to be put in place to limit onward transmission of COVID-19 to other students and staff. A small number of designated personnel in the University and Colleges will be able to access the test results by logging in to the University's secure IT system that stores them.

Alternatively, you may choose to book a test through the standard NHS Test and Trace system; this is not linked with the CUH/University 'pods' nor your University membership. If you book a test via the NHS system, neither the University nor your College will be informed directly of your results.

Whichever route you use for symptomatic testing – CUH/University 'pods' or standard NHS Test and Trace - when you receive your test result you should inform your College Porter's Lodge (for students) or your University/College line manager (for staff). You are also expected, especially if your test result is positive, to complete the online University form, which is returned to the COVID-19 Helpdesk. In some instances, you may receive a direct communication asking you to complete this online form at the time you receive your test results or shortly thereafter. Filling in the form helps the University to hold relevant and accurate information and to manage its data sharing with local and national public health authorities in a consistent manner in order to protect and support you and others. The types of information collected through the form broadly mirror those mentioned above but may include some additional information, for example whether you have a relevant underlying health condition, in order to support you most effectively. Some of the questions within the form are optional. A subset of the information from the completed form may be shared by the COVID-19 Helpdesk team with your College as applicable and necessary (to enable them to facilitate any self-isolation requirements for you or others and/or to comply with any regulatory requirements). The COVID-19 Helpdesk team may subsequently contact you to ask for additional information, for example about your close contacts, recent activities or living arrangements. Your close contacts may themselves be asked to complete a form in turn. The University will not pass on your identity, but it is possible your close contacts could infer it (e.g. if you are the only person with whom they have had recent contact). The activities coordinated by the COVID-19 Helpdesk complement the NHS Test and Trace system and efforts led by local public health teams to manage COVID-19 cases and outbreaks as swiftly and effectively as possible.

Personal data collected in the course of CUH/University 'pod' testing and COVID-19 Helpdesk activities may also be processed both to support the monitoring and evaluation of these activities and for scientific research in the public interest by the University of Cambridge and by other



researchers. Any such evaluation and/or research will be carried out using pseudonymised information (i.e. information with your identifying details removed) wherever possible. Note that, if you book a test at the CUH/University 'pods' and receive a positive COVID-19 test result, you may be asked (via the MyChart patient portal or by another means) to participate in further relevant research studies; participation in those studies is optional. If any research data is presented or published, it will be fully anonymous, without any means of identifying you. Researchers will abide by codes of ethical conduct.

Lawful bases for processing

The lawful bases under data protection legislation for the University's and Colleges' personal data processing described above are to meet any applicable legal obligations, to perform public tasks and tasks in the public interest (including in accordance with Government directions and guidelines), and to meet the University's, Colleges' and the wider community's legitimate interests (namely, their individual and shared interests in protecting the health of staff, students and members of the public from the risks of COVID-19). Where the personal data consists of sensitive (special category) information, such as medical information (e.g. your test result itself), the additional lawful bases for this data processing are to protect the public interest in the area of public health, for preventive and occupational medical purposes, to meet employers' duties of care, and for research purposes in the public interest (e.g. to analyse the effects of Colleges' household isolation policies, or to analyse the benefits of the COVID-19 Helpdesk model).

Data storage and retention

At all times we strive to keep the personal data collected to a minimum and we will handle it confidentially and carefully. We will retain and use it only for as long as necessary, but at least for as long as the COVID-19 pandemic is ongoing; in this regard, we will be guided by Government guidance, the standard retention periods adopted by the NHS Test and Trace system and the requirements of ongoing and future research into the pandemic. We do not take any wholly automated decisions about you based on this personal data. Data will be held securely on systems located either in the UK or in the European Economic Area. Where this involves health data, the systems used will meet the relevant data security and protection standards set by the NHS. We use a carefully selected third party IT supplier to provide the COVID-19 Helpdesk database and online form; there are appropriate contractual controls to ensure that your data is properly managed as part of this data processing arrangement.

Your data protection rights

Under data protection legislation you have the right to access the personal information that is held about you. You also have the right to ask us to correct any inaccurate personal information we hold about you, to delete personal information, or otherwise restrict our processing, or to object to processing or to receive an electronic copy of the personal information you provided to us. Please note that all of these rights are qualified in various ways. More information about exercising these rights is included in the general privacy notices for students and staff referred to above and below.

Questions and complaints

If you have any questions about the information in this notice, please contact the COVID-19 Helpdesk at Covid-helpdesk@admin.cam.ac.uk in the first instance. More information about how the University handles your personal data as a student or a member of staff is published



elsewhere; these general privacy notices contain further details about your various rights under data protection legislation and your formal routes of internal and external complaint on data protection matters.

Changes to this notice

This notice was last updated on 18 August 2021. We keep it under regular review to make sure it remains up-to-date and accurate. We are reacting quickly to unprecedented circumstances in a fast-changing public health and regulatory environment. We will notify all staff and students of material changes to this notice, but please also check this webpage regularly for updates.

